

CONSOLIDATED
FINANCIAL
STATEMENTS
2024

GRUPPO CASSA DI
RISPARMIO DI ASTI

www.bancadiasti.it





GRUPPO CASSA DI
RISPARMIO DI ASTI

Registered Office and General Management:
14100 Asti – Piazza Libertà 23

www.bancadiasti.it

info@bancadiasti.it





CONTENTS

REPORT ON OPERATIONS	Page	5
Key operating data	“	7
Global economic trends	“	10
Company operations	“	24
Mission and strategic design	“	24
Disclosures required by ESMA	“	24
Commercial policy	“	27
Human resource management	“	52
The environment and ESG issues	“	57
Development strategy and projects	“	58
The internal control system	“	64
Main risk factors relating to the Group and the sector it operates in	“	68
Economic performance	“	74
Income trends	“	74
Operating interest margin	“	75
Gross banking income	“	75
Net banking income	“	77
Profit before tax from continuing operations	“	78
Taxes and net profit	“	80
Funding and credit management	“	82
Assets managed on behalf of customers	“	82
Direct funding	”	83
Assets under management and under custody	“	83
Loans and advances to customers	”	84
Credit quality	“	85
Operations on the financial markets and the composition of the Group	“	89
Company liquidity and the securities portfolio	“	89
Composition of the Group	”	90
Performance of the main Group companies	“	91
Share capital accounts	“	92
Shareholders' equity	”	92
Share capital of the Parent Company	“	93
Treasury shares	“	93
Corporate Governance Report pursuant to Article 123-bis“	“	93
Total Bank Own Funds and capital ratios	“	94
Sustainability Statement	“	97
Significant events after the end of the year	“	333
Evolution of the operating context	“	333
Outlook on operations	“	334
Significant events after the end of the year	“	336



CONTENTS

Other information	“	336
CONSOLIDATED FINANCIAL STATEMENTS		
Consolidated Balance Sheet	“	339
Consolidated Income Statement	“	343
Statement of consolidated comprehensive income	“	347
Statement of changes in consolidated shareholders' equity	“	349
Consolidated statement of cash flows	“	353
NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS		
Part A		
Accounting Policies	“	358
Part B		
Information on the Consolidated Balance Sheet	“	410
Part C		
Information on the Consolidated Income Statement	“	460
Part D		
Consolidated comprehensive income	“	473
Part E		
Information on risks and relative hedging policies	“	475
Part F		
Information on shareholders' equity	“	579
Part G		
Business combinations concerning companies or business branches	“	583
Part H		
Related party transactions	“	584
Part I		
Share-based payment arrangements	“	588
Part L		
Segment reporting	“	590
Part M		
Disclosure on leases	“	593
Publication of fees for auditing and for services other than auditing	“	595
Other information	“	596
INDEPENDENT AUDITORS' REPORT	“	597
Annexes:		
Reconciliation of the reclassified Balance Sheet and Income Statement	“	614
Country-by-Country Reporting pursuant to Bank of Italy Circular 285/2013	“	618



GRUPPO CASSA DI
RISPARMIO DI ASTI

REPORT ON OPERATIONS





KEY CONSOLIDATED
OPERATING
DATA

KEY CONSOLIDATED OPERATING DATA

Amounts are shown in € thousand

MAIN BALANCE SHEET DATA	31/12/2024	31/12/2023	CHANGES	
			Absolute	%
NET LOANS AND ADVANCES TO CUSTOMERS	7,354,878	7,423,974	-69,096	-0,93%
DIRECT FUNDING	10,674,211	10,398,412	275,799	2,65%
INDIRECT FUNDING ⁽¹⁾	8,328,259	7,608,663	719,596	9,46%
TOTAL BALANCE SHEET ASSETS	13,012,224	12,714,075	298,149	2,35%
TOTAL OWN FUNDS ⁽²⁾	999,062	1,028,144	-29,082	-2,83%

MAIN INCOME STATEMENT DATA	31/12/2024	31/12/2023	CHANGES	
			Absolute	%
NET BANKING INCOME	371,177	376,862	-5,685	-1,51%
OPERATING COSTS	-277,248	-273,483	-3,765	1,38%
GROSS OPERATING PROFIT (LOSS)	93,929	103,379	-9,450	-9,14%
GROSS PROFIT FROM CONTINUING OPERATIONS	78,045	99,880	-21,835	-21,86%
NET PROFIT	51,229	79,039	-27,810	-35,19%
PROFIT NET OF EXTRAORDINARY ITEMS ⁽³⁾	51,145	44,158	6,987	15,82%

OTHER DATA AND INFORMATION	31/12/2024	31/12/2023	CHANGES	
			Absolute	%
EMPLOYEES	1,888	1,827	61	3,34%
BANK BRANCHES	209	209	0	0,00%
NON-BANKING BRANCHES	84	86	-2	-2,33%
NUMBER OF CUSTOMERS	535,968	526,818	9,150	1,74%

INDICATORS

PROFITABILITY INDICATORS	31/12/2024	31/12/2023
OPERATING COST INCOME ⁽⁴⁾	57,15%	60,63%
OPERATING ROE ⁽³⁾	4,68%	4,32%

RISK INDICATORS	31/12/2024	31/12/2023
GROSS NPL RATIO ⁽⁵⁾	5,22%	4,36%
NET NPL RATIO	2,92%	2,36%
NET BAD LOANS/NET LOANS AND ADVANCES TO CUSTOMERS	0,45%	0,56%
COVERAGE RATIO FOR BAD LOANS ⁽⁵⁾	66,32%	65,30%
COVERAGE RATIO FOR TOTAL NON-PERFORMING LOANS	45,63%	47,47%
TEXAS RATIO ⁽⁵⁾	31,65%	27,93%
FINANCIAL LEVERAGE ⁽⁶⁾	12,11	12,23

CAPITAL RATIOS	31/12/2024	31/12/2023
CET 1 RATIO (CET1/RWA)	15,34%	14,88%
TIER 1 RATIO (TIER1/RWA)	17,02%	16,53%
TOTAL CAPITAL RATIO (TOTAL OWN FUNDS/RWA)	17,25%	17,39%

LIQUIDITY	31/12/2024	31/12/2023
LCR	274,07%	240,36%
NSFR	175,39%	169,20%

The schedules have been prepared using the figures of the reclassified balance sheet and reclassified income statement for operating purposes.

For the reconciliation between the reclassified financial statements and the statutory accounts, refer to the schedules shown in the "Annexes".

(1) Adjusted the valuation criteria applied in 2023 for consistency with financial year 2024

(2) Own funds calculated for 2024 without including profit for the period.

(3) Calculated net of the earn-out from the contribution transaction of the acquiring business unit and extraordinary provisions for commission reimbursements. For the year 2023, the index is calculated net of the transfer transaction by contribution of the merchant acquiring.

(4) The index was calculated net of the earn-out of the contribution of the acquiring business unit; for the year 2023, the index is calculated net of the transfer transaction for the contribution of the merchant acquiring.

(5) Bad loans are stated net of default interest deemed to be entirely irrecoverable.

(6) Calculated as the ratio of total assets net of intangible assets (numerator) and shareholders' equity net of intangible assets (denominator).



KEY CONSOLIDATED
OPERATING
DATA

RECLASSIFIED CONSOLIDATED BALANCE SHEET

(Amounts are shown in €/thousand)	31/12/2024	31/12/2023	CHANGES	
			Absolute	%
ASSETS				
Cash and cash equivalents	896,745	646,993	249,752	38,60
Financial assets other than loans (FVPL and FVOCI)	1,197,742	1,095,462	102,280	9,34
Financial assets:	9,654,470	9,656,832	-2,36	-0,02
- of which: loans and advances to banks	148,876	192,294	-43,418	-22,58
- of which: loans and advances to customers	7,354,878	7,423,974	-69,096	-0,93
- of which: other financial assets measured at amortised cost	2,150,716	2,040,564	110,152	5,40
Hedging derivatives	2	18,312	-18,310	-99,99
Equity investments	234	195	39	20,00
Property, plant and equipment and intangible assets	286,279	292,292	-6,013	-2,06
Tax assets	180,553	219,833	-39,280	-17,87
Non-current assets held for sale and discontinued operations	2,375	2,375	0	0,00
Other assets	793,824	781,781	12,043	1,54
TOTAL ASSETS	13,012,224	12,714,075	298,149	2,35
LIABILITIES AND SHAREHOLDERS' EQUITY				
Deposits from banks	710,930	765,196	-54,266	-7,09
Financial liabilities held for trading	1,936	1,974	-38	-1,93
Direct funding	10,674,211	10,398,412	275,799	2,65
- of which: deposits from customers	9,643,820	9,209,382	434,438	4,72
- of which: debt securities in issue	1,017,895	1,176,262	-158,367	-13,46
- of which: financial liabilities designated at fair value	12,496	12,768	-272	-2,13
Hedging derivatives	79,531	112,954	-33,423	-29,59
Tax liabilities	261	121	140	n.s.
Other liabilities	342,990	273,117	69,873	25,58
Provisions for risks and charges	52,774	46,094	6,680	14,49
Shareholders' equity	1,119,104	1,091,667	27,437	2,51
Minority shareholders' equity	30,487	24,540	5,947	24,23
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	13,012,224	12,714,075	298,149	2,35

For the reconciliation between the reclassified financial statements and the statutory accounts, refer to the schedules shown in the "Annexes".



KEY CONSOLIDATED OPERATING DATA

RECLASSIFIED CONSOLIDATED INCOME STATEMENT

(Amounts are shown in €/thousand)	31/12/2024	31/12/2023	CHANGES	
			Absolute	%
NET INTEREST MARGIN	297,000	271,412	25,588	9,43
Net fees and commissions	70,785	96,102	-25,317	-26,34
of which: Commercial banking	131,078	133,964	-2,886	-2,15
of which: Pitagora	-60,293	-37,862	-22,431	59,24
Net profit (loss) from trading, hedging, assets/liabilities measured at fair value through profit or loss and at fair value through other comprehensive income, gains/losses on disposal of loans (Pitagora)	103,894	65,671	38,223	58,20
of which: Commercial banking	10,364	3,722	6,642	178,45
of which: Pitagora (net of provisions for prepayment) ⁽¹⁾	93,530	61,949	31,581	50,98
Dividends and similar income	10,387	10,335	52	0,50
Other operating expenses/income	8,028	41,825	-33,797	-80,81
GROSS BANKING INCOME	490,094	485,345	4,749	0,98
Gains/Losses on disposal of financial assets measured at amortised cost	-22,194	-41,896	19,702	-47,03
Net adjustments for credit risk to financial assets measured at amortised cost	-96,938	-66,278	-30,660	46,26
Profits/losses from contractual changes without derecognition	215	-309	524	n.s.
NET BANKING INCOME	371,177	376,862	-5,685	-1,51
Operating Costs:	-277,248	-273,483	-3,765	1,38
Personnel expenses	-147,117	-140,468	-6,649	4,73
Other administrative expenses	-104,674	-108,685	4,011	-3,69
of which: other administrative expenses	-96,212	-94,290	-1,922	2,04
of which: contributions to the National Resolution Fund, SRF and DGS	-8,462	-14,395	5,933	-41,22
Net adjustments to property, plant and equipment/intangible assets	-25,457	-24,330	-1,127	4,63
GROSS OPERATING PROFIT (LOSS)	93,929	103,379	-9,450	-9,14
Net allocations to provisions for risks and charges	-15,614	-3,556	-12,058	n.s.
Other non-recurring income/charges	-270	57	-327	n.s.
PROFIT BEFORE TAX FROM CONTINUING OPERATIONS	78,045	99,880	-21,835	-21,86
Taxes	-26,816	-20,841	-5,975	28,67
PROFIT FROM CONTINUING OPERATIONS	51,229	79,039	-27,810	-35,19
PROFIT FOR THE YEAR	51,229	79,039	-27,810	-35,19

The schedules have been prepared using the figures of the reclassified income statement for operating purposes by referring to the methods illustrated in "Economic performance".

For the reconciliation between the reclassified financial statements and the statutory accounts, refer to the schedules shown in the "Annexes".



GLOBAL ECONOMIC TRENDS

The macroeconomic scenario During 2024, the expansion of economic activity at global level continued, albeit at a different pace between the various geographical areas. Consumption continued to support growth in the United States. In China, domestic demand is still affected by the consequences of the real estate market crisis. The outlook for the global economy is affected by international tensions and uncertainty regarding the economic policies that will be adopted by the new US management. Since last autumn, oil prices have risen slightly, as have those of natural gas, after strong fluctuations.

In the third quarter of 2024¹, economic activity in the United States, although showing a slight slowdown, continued to expand, driven mainly by household consumption. After the decrease in October, attributable to temporary factors, employment increased both in November and, to an even greater extent than expected, in December. According to the OECD, in 2024 as a whole, US GDP grew by 2.8%, the highest figure among the advanced economies. Gross domestic product slowed down in the United Kingdom and Japan, affected respectively by the weakening of domestic and foreign demand. In China, economic activity, although accelerating in the fourth quarter, continues to reflect the weakness of consumption and the persistent crisis in the real estate sector.

In the fourth quarter, the SME indices of manufacturing purchasing managers continued to show signs of weakness, especially in the Eurozone, while they showed a slight recovery in China, where retail sales and exports grew more than expected. Service indicators improved in the United States, where they were also affected by the resolution of political uncertainty after the election outcome, as well as in China; they deteriorated in the other major advanced economies, while remaining above the expansion threshold. According to projections published in December by the OECD, global GDP would grow by 3.3% in 2025, in line with 2024. However, these forecasts are burdened by the risks deriving from the escalation of international tensions.

In the summer, international trade slowed down, albeit lower than expected, thanks to the sustained expansion of US imports. The intention of introducing custom duties by the US management will negatively affect the performance of world trade, however, in the short term, the latter could accelerate if the importers decide to anticipate their orders in view of the enforcement of the announced measures. However, the evolution of international trade will be strongly affected by the trade policies of the United States and the possible reactions of other countries.

Since the beginning of October, the price of Brent has slightly increased, by around 3%, to around USD 80 per barrel. After the fall in the autumn months, prices started to rise again in the first half of January, following robust US macroeconomic data and the introduction of new US sanctions against the Russian oil industry. The outcome of the US elections has fuelled expectations of an expansion in oil production, mitigating the impact on prices of the decision of OPEC + member countries to extend supply cuts and postpone subsequent increase.

¹ Source: European Central Bank - ECB Economic Bulletin, no. 8 – 2024
Bank of Italy - Economic Bulletin, no. 1 - 2025 - January 2025



Since October, after a period of high volatility, the reference price of natural gas for the European markets (Title Transfer Facility, TTF) has risen to € 47 per megawatt-hour. In addition to various demand-related factors, such as the start of the cold season and the reduced production of electricity generated by wind farms, from the end of December the increase mainly reflects the interruption of Russian gas flows to Eastern Europe via Ukraine, which were meeting about 5% of annual European gas demand. The interruption was determined by the non-renewal of the transit agreement between the two countries. The moderate increase in supply risks was reflected in the prices of one-year futures contracts, which rose to € 43 per megawatt-hour. In addition, European storage in the first half of January fell to 66% of total capacity, about 15 percentage points below the levels observed in the same period of last year.

In December, twelve-month consumer inflation rallied slightly in the United States, in line with analysts' expectations, reaching 2.9% (from 2.7% in November); the core component fell to 3.2%. In the United Kingdom, inflation fell to 2.5%, a value slightly below expectations; in Japan, on the other hand, it increased more than expected, to 2.9%. At the December meeting, the Federal Reserve decided to cut the benchmark rates again by 25 basis points, bringing them to 4.25-4.5%. The members of the Federal Open Market Committee expect further cuts of 50 basis points by December 2025. In December, the Bank of England, after the 25 basis point cut decided at the previous meeting, kept rates unchanged at 4.75%, confirming a cautious and gradual approach to easing. In the same month, the Bank of Japan, despite widespread expectations of an increase, left rates unchanged at 0.25%. The Chinese Central Bank confirmed an expansive monetary stance, aimed at supporting economic growth in a context of still weak domestic demand. On the tax front, after the package of measures announced in November to manage the financial risks of local governments, the Chinese authorities announced in mid-December a new action plan for 2025, focused on supporting domestic consumption, the details of which, however, do not have still been disclosed.

The Gross Domestic Product (GDP) of the Eurozone slowed down in the autumn months. Economic activity, still sluggish in the industrial sector, also contracted in the services sector. Aggregate demand saw a decline in consumption and investments. Inflation remained at around 2%, despite the persistently growth of the services component, driven by items whose prices adjust more slowly. In December, the Governing Council of the ECB further reduced the interest rate on deposits at the Central Bank by 25 basis points, bringing it to 3%. The previous contractions are being reflected in the cost of credit.

In the third quarter of 2024, the Eurozone GDP recorded an acceleration by 0.4% from 0.2% in the previous period. The higher growth is partly attributable to the strong expansion in Ireland, due to a marked, albeit temporary, increase in investments in intellectual property. Among the main countries, GDP substantially stagnated in Germany and Italy, while it increased at a rapid pace in Spain; in France, economic activity benefited from the increased demand related to the Olympic Games. Within this scope, the negative contribution of net foreign demand was more than offset by

The scenario in Europe



GLOBAL ECONOMIC TRENDS

that of consumption and investments. The latter, net of the Irish contribution, however, decreased. On the supply side, added value rose in services and construction, but fell in manufacturing (excluding the exceptional Irish figure).

The available indicators suggest only a modest increase in Eurozone GDP in the fourth quarter, consistent with the elimination of the temporary factors that had supported activities in the summer months.

On the demand side, available information indicates a weakening of consumption. Household confidence fell and was held back particularly by pessimism about the general economic situation and expectations of a deteriorating labour market. Investments would also have continued to be affected by still restrictive loan conditions. The contribution of net foreign demand is positive, but only thanks to a more marked decline in imports than exports, as suggested by the drop in qualitative indicators relating to foreign orders. The €-coin indicator compiled by the Bank of Italy also continues to foreshadow a modest expansion of activity for the autumn months.

According to the projections of Eurosystem experts published in December, after a growth of 0.7% in 2024, the Eurozone GDP will expand by 1.1% in 2025, by 1.4% in 2026 and by 1.3% in 2027. Compared to last September, the forecasts have been revised downwards, overall by about half a percentage point in the 2024-26 three-year period. The revision mainly reflects expectations of a more contained recovery in household spending and exports.

In December, according to preliminary estimates, consumer inflation rose to 2.4% over the twelve months due to the trend in the energy component, which turned slightly positive. Core inflation, measured net of food and energy, has remained stable at 2.7%; services inflation remains high at 4.0% since the end of 2023, supported by items whose prices adjust later than the overall index (e.g., housing rents, health services and insurance activities).

In the third quarter of 2024, wage increase in the Eurozone remained high, at 4.8%. According to the latest available data, however, wage pressures will ease over the course of 2025. Contractual wages (net of one-off payments) continued to accelerate in Germany (to 5.7% in December), although the recent agreement in the mechanical engineering and power sector, affecting some 4 million workers, provides indications of moderation for the next two years. On the other hand, the trend confirms to be stable and more contained in Spain (at 3.1% in November) and in France (at 2.7% in the third quarter). Average contractual increases remain particularly high in the Netherlands (at 6.6% in December).

After the rate cut in October, at the December meeting, the Governing Council of the ECB further lowered the interest rate on deposits by 25 basis points, bringing it to 3%. The decision is motivated by the updated assessment of the inflation outlook, the trend of core inflation and monetary policy transmission.



Since the beginning of October, expectations for a decline in benchmark rates implied in the €STR swap contracts have softened: markets expect an overall reduction of about 75 basis points in 2025.

In the autumn months, the interest rate on new loans to non-financial companies and that on new mortgages to households for home purchases decreased (to 4.5% and 3.5%, respectively, compared to 5.0% and 3.7%). The decrease is in line with that of the reference risk-free rates and with the reduction in the cost of bank funding. The trend in lending to non-financial companies in the Eurozone remains weak overall; in November, it strengthened only slightly, standing at 1.8% over three months and 1.0% over the year. Among the main countries, growth in loans to businesses is confirmed as more sustained in France, remaining negative or in any case contained in Germany, Spain and Italy. These trends continue to reflect modest credit demand, albeit slightly recovering, and supply criteria that remain at restrictive levels. Loans to households in the area accelerated, over three months and on an annual basis (to 1.7% and 0.9%, respectively), reflecting a sharp increase in demand for credit for home purchases, favoured by the decrease in the cost of credit.

In Italy, the gross domestic product (GDP) showed a phase of stagnation in the third quarter of 2024², still affected by the weakness of the manufacturing sector, against a slight expansion in services and construction. Household consumption recorded a marked increase, while investments fell considerably with a negative contribution of net export. The most recent projections indicate an acceleration of GDP in the 2025-27 three-year period, with growth rates of around 1% per year on average for the period. During the third quarter, economic activity remained unchanged compared to the previous three months. Domestic demand supported the GDP performance thanks to the growth in household consumption and the contribution of the changes in stocks, which more than offset the decline in investments. The decline in capital accumulation concerned almost all the main components; in particular, that of capital goods decreased on a trend basis for the fourth consecutive quarter. Investments in non-residential buildings are increasing, benefiting from the construction of works related to the National Recovery and Resilience Plan (NRRP).

The scenario in Italy

GDP growth remained weak also in the fourth quarter. The weakness in manufacturing continued, albeit diminishing, while the added value was again slightly increasing in construction and services. On the demand side, the recovery of net exports, due to a decrease in imports, is accompanied by a still tenuous investment dynamic and a softening in the contribution of consumption after the previous quarter's jump. The Ita-coin indicator, which measures the dynamics of the product without cyclical volatility, remained at values close to zero in the autumn months, confirming the continuation of the weakness of economic activity. Based on the most recent macroeconomic projections, GDP, which grew by 0.5% in 2024 (by 0.7% excluding the correction for working days), would expand on average by 1.0% in the 2025-27 three-year period.

²Source: Bank of Italy - Economic Bulletin, no. 1 - 2025 - January 2025



GLOBAL ECONOMIC TRENDS

On 13 December, the macroeconomic projections for the Italian economy for the 2024-27 period, prepared as part of the coordinated Eurosystem exercise, were published. Although in an environment of high uncertainty, the forecast scenario assumes a gradual strengthening of foreign demand growth, albeit at lower values than the average values of the pre-pandemic decade; consistent with the expectations embedded in futures contracts, a slight decline in energy commodity prices is also assumed. Interest rates, taken from market prices, would fall over the three-year period in the short-term segment and rise slightly in the long-term segment.

GDP is projected to increase by 0.5% in 2024 (by 0.7% unadjusted for working days) and accelerate in the 2025-27 three-year period, with an expansion of GDP of around 1% per year on average for the period. Growth is estimated to remain moderate in the first part of 2025, regaining momentum, thereafter, supported by consumption and exports, which benefit from the recovery in disposable income and international trade. On the other hand, it is estimated that investments will slow down, mainly due to the effects of the downsizing of residential construction incentives, only partially offset by the NRRP measures. Compared to the projections published in October, GDP growth is revised downwards over the 2024-26 time frame due to the data, less favourable than expected, published at the end of the year just ended, of a more contained performance in foreign demand and of slightly higher interest rates.

In December, harmonised consumer inflation fell slightly, standing at 1.4% on an annual basis (from 1.5% in November). There was a minor decline in energy prices, while food inflation fell. The core component (net of energy and food) also declined (1.8% compared to 2.0%), reflecting the slowdown in the prices of both non-energy industrial goods, which remained substantially stable, and services, whose growth remains relatively robust (2.9%).

For the first quarter of the new year, the Regulatory Authority for Energy, Networks and the Environment (ARERA) announced an increase in electricity tariffs on the regulated market for vulnerable users of approximately 20% compared to the previous period. This increase is attributable to the persistence of geopolitical tensions and the seasonal rally in wholesale energy prices.

The increase in employment continues, despite some signs of weakening of the labour market: the number of hours worked per employee has reduced and the use of the Redundancy Fund (CIG - Cassa Integrazione Guadagni) has remained high. The decline in the participation rate, which continued also in the summer months, contributed to the drop in the unemployment rate. The cost of hourly labour accelerated in the private sector, driven by the positive dynamics of contractual wages. Wage growth remained strong in the autumn months.

The banking market The reduction in official rates is being reflected in the cost of bank funding and credit, in line with historical trends. Lending to non-financial companies contracted further amid persistently weak credit demand and still restrictive supply criteria. The companies also made net redemptions of bonds. Lending to households remains



modest, although mortgages for home purchases showed a slight acceleration, reflecting the moderate expansion in demand.

Between August and November, the marginal cost of bank funding decreased by 26 basis points (to 1.7%). This was due to lower rates on the interbank market, lower cost of bond funding and a decline in the yield on new deposits with a fixed term; the rate on current account deposits, on which the monetary tightening of 2022-23 had been reflected to a small extent, remained unchanged (0.5%). Bank funding continued to decline (-2.2% on an annual basis): the repayment of TLTRO3 funds and the decline in liabilities held by non-residents were only partially offset by the growth in other sources of funding. The transmission of the decline in official rates to the cost of credit to non-financial companies is in line with historical trends: interest rates fell between August and November on both new bank loans (4.5% from 5.1%), reflecting the decline in the reference risk-free rate, and on existing loans, due to the large share of variable-rate transactions. The average cost of new mortgages to households for home purchases also fell (3.2% compared to 3.6%), as did that of consumer credit (8.5% compared to 8.8%). In November, loans to businesses continued to decline, albeit to a lesser extent than in August (-1.5% compared to -5.3% on a quarterly basis). The decline is more pronounced for companies with fewer than 20 employees and for the manufacturing segment. Conditions for access to credit would also remain restrictive according to the Bank of Italy's Survey of Inflation and Growth Expectations conducted among businesses between late November and mid-December, particularly for small- and medium-sized companies, and - according to Istat data - for those in manufacturing and construction segment.

In the third quarter of 2024, the persistent weakness in business credit demand was associated, for the first time in the last twelve months, with net redemptions of bonds (for € 1.8 billion): the decline in gross issues was only partially offset by the reduction in redemptions. Since the beginning of October, the yields of bonds of Italian non-financial companies have increased by around 6 basis points (to 3.7%). Since the beginning of October, 10-year yields on Italian government issues have risen; however, the spread against corresponding German bonds has narrowed. Italian share prices recorded an increase, in contrast to the Eurozone, mainly due to the good performance of the financial sector.



GLOBAL ECONOMIC TRENDS

Italian macroeconomic scenario - GDP and components					
% Changes	2023	2024	2025 ⁽¹⁾	2026 ⁽¹⁾	2027 ⁽¹⁾
Gross domestic product	0.8	0.5	0.5	0.8	0.5
Imports of goods and services	0.0	-2.4	1.5	1.9	1.6
Households and Social private institutions for households spending	1.0	0.6	0.8	1.0	0.9
Public Administration spending	1.9	0.5	0.3	0.2	-0.1
Gross fixed investments	8.7	0.1	-0.7	-1.1	-1.9
of which: inv. in mach., equipment, means of transport, and various products	2.3	-2.6	1.9	4.0	2.5
of which: inv. in construction	15.0	2.6	-3.0	-5.9	-6.5
Exports of goods and services	1.1	-0.2	1.6	1.8	1.8
Total domestic demand	0.4	-0.2	0.5	0.7	0.4
Domestic demand net of inventory changes	2.9	0.4	0.4	0.3	0.1
Current account and capital account balance as a % of GDP	0.7	1.0	1.4	1.6	1.6
Terms of trade	11.0	2.0	-1.6	0.3	0.2
General consumer price index	5.7	1.1	1.9	2.1	2.0
Per capita industry wages in the strictest sense	3.6	4.3	3.3	2.7	2.6
General producer price index ⁽²⁾	-8.3	-6.1	3.4	1.5	1.5
Producer price index for non-food products	2.0	-1.1	2.2	2.1	1.8
Disposable income at constant prices	-0.2	3.0	1.2	0.7	0.4
Propensity to consume (% level)	92.8	90.6	90.2	90.5	91.0
Total employment	2.3	1.5	0.3	0.5	0.4
General industrial production index	-2.1	-3.2	0.3	1.6	1.2
Degree of utilisation of production capacity in industry (% level)	76.9	75.6	76.1	76.2	75.9
Public Administration indebtedness (millions of current euros)	152,735	85,610	83,765	69,355	66,701
as % of GDP	7.2	3.9	3.7	3.0	2.8
Public Administration interest expense as % of GDP	3.7	3.9	4.0	4.1	4.2
Public Administration debt as % of GDP	134.8	136.6	138.8	139.9	139.6
Average rate on BOTs ⁽³⁾	3.5	3.3	2.0	1.9	2.2
Rate on loans to businesses ⁽³⁾	4.6	5.2	4.3	3.9	3.9
Average rate on medium/long-term government bonds ⁽³⁾	3.9	3.5	3.1	3.3	3.8
Gross domestic product per capita at constant prices	1.0	0.3	0.7	1.0	0.7
Gross domestic product at current prices (millions of euro) ⁽⁴⁾	2,128,002	2,183,119	2,237,574	2,303,708	2,365,321

⁽¹⁾ Prospective data

⁽²⁾ Domestic producer prices

⁽³⁾ Average annual rate

⁽⁴⁾ Unadjusted data for the different number of working days

Source: Prometeia forecasts based on Istat and Bank of Italy data

The local economy In the first half of 2024, growth in the Piedmont economy was modest, mainly affected by the negative performance of manufacturing. According to the quarterly Indicator of the Regional Economy (ITER - Indicatore Trimestrale dell'Economia Regionale) compiled by the Bank of Italy, gross domestic product in Piedmont increased by 0.4% compared to the same period last year, in line with the national and Northern Italy average. In the third quarter, the Bank of Italy's Regiocoin indicator³, which provides an estimate of the evolution of the underlying components of the regional economy, worsened, reflecting the weak economic scenario. In the first six months of the year, industrial production contracted significantly and more sharply than the national

³ Source: Bank of Italy - Regional economies - The Piedmont economy - Economic update, no. 23 - November 2024



average. The dynamics are mainly attributable to the automotive sector, which was also affected by the sharp decline in foreign demand, particularly German demand. The manufacturing cycle remained weak also in the third quarter. The deterioration of the economic situation, combined with significant geopolitical uncertainty and high interest rates, has held back investments; the incentives for energy efficiency and digital transformation, provided for by the National Recovery and Resilience Plan (NRRP), however, still provided support for capital goods spending. In the services sector, activity continued to grow, most strongly in higher-tech services and tourism; however, signs of a slight slowdown have emerged since the summer, most markedly in trade. In the construction sector, the reduction in upgrading works related to the Superbonus was countered by increased activity at the construction sites of works financed by the NRRP, whose progress is above the country average.

The economic and financial situation of companies remained solid. Liquidity has increased and companies' assessments of their ability to generate profits have only marginally deteriorated. Lending to the production system continued to decline, albeit with varying intensity across sectors and size classes. The trend mainly reflected the continued weakness in demand, amidst still high credit costs and intermediaries' supply criteria that remain cautious. However, the capacity to repay loans remained high.

The number of employees grew in the first half year and the creation of new jobs continued, albeit less intensely than in 2023. Signs of weakening emerge, however, from companies' qualitative indications of hours worked in manufacturing and especially from the sharp increase in the use of wage subsidy instruments in some manufacturing sectors. The disposable income of households began to rise again in real terms, after the slight decline last year, also thanks to the return of inflation to more contained levels. Consumption, on the other hand, stagnated, also affected by the sharp deceleration in car purchases. The trend in new mortgages to households was still negative on average for the half year, but since spring has shown slight signs of recovery, in connection with the gradual decline in interest rates and the recovery in home purchases and sales. Consumer credit has only slightly slowed down and rates charged have remained essentially stable. Against the backdrop of prudent supply criteria, no tensions have emerged on the quality of loans disbursed to households.

In industry, expectations for the coming months remain pessimistic, mainly due to the lack of dynamism in foreign demand and, in automotive, difficulties related to the energy transition. On the other hand, the climate of confidence remains mildly positive in services, albeit with considerable dissimilarities among the various segments. In the construction sector, operators' forecasts do not expect significant changes in levels of activity. Data from Confindustria Piemonte report further deterioration in production and order forecasts for the fourth quarter of 2024, affecting both large and small firms. These indications are confirmed by the sample of companies interviewed by the Association of Small and Medium Enterprises (API, Associazione Piccole e Medie Imprese) of Turin. Expectations for 2025 do not foreshadow a significant recovery in capital accumulation, although conditions for investing could benefit from the



GLOBAL ECONOMIC TRENDS

monetary easing initiated last June and the implementation in full of the Transition 5.0 Plan.

In the first six months of 2024, the growth of activity in the construction industry came to a halt, settling at the highest level in the past decade. The hours worked by employees enrolled in the regional building industry relief funds fell slightly compared to the previous half year. As in the rest of the country, the boost of the Superbonus for the energy recovery of buildings substantially subsided during the year, while companies continued to benefit from the high public demand. The expenditure for gross fixed investments by local authorities, already at high levels in historical comparison, in fact increased further in the first six months of 2024 compared to the same period of 2023. Mainly contributing to this dynamic, which continued in the third quarter, is the gradual implementation of projects under the NRRP, which is at a more advanced stage than the national average. In the real estate market, the decline in home purchases and sales eased (-3.8% in the first six months on a year-on-year basis; -8.9% in 2023 as a whole): the recovery in the second quarter, also connected with the gradual reduction in mortgage interest rates, contributed to it.

In the first half year of 2024, the performance of the services sector was still moderately favourable. Confindustria Piemonte's qualitative indicators of business activity remained positive, especially in the higher-tech services (ICT) sector. Starting from the summer, the cyclical scenario has undergone a slight deterioration most markedly in trade. In the first nine months as a whole, the balance between indications of increase and decrease in turnover compared to the same period of 2023 of companies with at least 20 employees in the Bank of Italy's sample was still positive, but lower than that recorded the year before. For the latter part of 2024 and the beginning of 2025, forecasts do not anticipate significant changes in revenue dynamics. The good performance of tourism continued. Overnight stays, which had reached historically high levels in 2023, rose further in the first six months of 2024 (4.2% year-on-year, according to provisional information provided by the Piedmont Region Tourism Observatory); the increase involved both Italian tourists and, to a greater extent, foreigners.

After the peak reached in mid-2023, the downsizing of foreign demand continued in the first part of 2024. Between January and June, regional exports at current values fell by 0.3% on the previous half year.

According to the Istat Labour Force Recognition (RFL - Rilevazione sulle Forze di Lavoro), on average in the first half year of 2024, the number of employees continued to increase (3.2% compared to the same period of the previous year); based on seasonally-adjusted data, the increase in the first quarter was followed by a slight decline. In the first six months as a whole, the further growth in employment was associated with the recovery of self-employment. The employment rate of the population between the ages of 15 and 64 was 69.4%, 2.2 percentage points higher on an annual basis; the positive trend affected both men and, to a greater extent, women. Participation in the labour market also increased and the activity rate reached 73.6%.



The number of job seekers continued to decline, reflecting the unemployment rate which, on average in the first half of the year, fell slightly (to 5.8%).

In the first half year of 2024, household disposable income began to increase again in real terms, after the slight decrease in the previous year. According to the ITER-red indicator prepared by the Bank of Italy, the increase was 2.2% (2.3% in the country average and in the North). The recovery of purchasing power benefited from further growth in nominal income (3.5%), albeit more contained than in 2023, and above all from the net slowdown in inflation trend.

After the marked decline recorded in the second half of 2023, inflation remained at low values: in September, the change in prices over the twelve months, measured by the consumer price index for the entire community (NIC), was 0.4% (0.7% in Italy). Overall, in the first nine months of 2024, it was 0.7%, up from 6.1% of the average in 2023. Disinflation is largely attributable to the reduction in domestic utilities prices, which already began in the last part of 2023, and the gradual stabilisation of those of food products. The decline in inflation was less pronounced for services, including hospitality and catering.

In the first six months of 2024, cash and cash equivalents increased further compared to December 2023, reaching particularly high levels in historical comparison. The dynamic was spread to all technical forms. The increase in liquidity concerned about a quarter of the companies in the Bank of Italy's sample interviewed between September and October, while there were no substantial changes for more than half. As in the previous year's survey, about three quarters of companies assess their cash and cash equivalents as more than sufficient or abundant for the operating needs of the last part of 2024. Confindustria Piemonte's qualitative indicators on payment delays and payment times in the first nine months report no significant changes compared to the same period of 2023 in both industry and services.

In the first half year of 2024, lending to the production system continued to decline (-3.3% on an annual basis), but to a lesser extent than at the end of 2023. The latter performance was affected by loans to medium-large companies, whose contraction was significantly eased, and those to the services sector, which returned to grow for the first time since the end of 2022. Lending trends reflected a demand that has stopped declining, but was still weak, and credit disbursement criteria marked by prudence on the part of intermediaries. Expectations of a monetary easing, which then began in June, favoured a modest drop in the cost of credit, which however still remained high in historical comparison. The annual percentage rate of charge (EAPR) on new bank loans to businesses and for investment purposes fell from 6.4% in the last three months of 2023 to 5.7% in the second quarter of 2024, while the average interest rate charged on the stock of loans related to liquidity needs (APR) remained close to 6.7%.

In the first half of 2024, the contraction of loans from banks and financial companies to Piedmont households continued, but at a more moderate pace than at the end of last year. In June, the annual rate of change was -0.7% (-1.0% in December): the easing



GLOBAL ECONOMIC TRENDS

of the decline in loans for home purchases was accompanied by a slight slowdown in consumer credit.

Consumer credit continued to expand, slightly less than at the end of 2023 (4.5% in June on an annual basis, from 5.0% in previous December): the slight slowdown is due to the weakening of growth in loans for the purchase of motor vehicles, while personal loans accelerated. The dynamics of bank mortgages and consumer credit reflected an improvement in demand, in the presence of still prudent supply criteria. According to data that are still provisional, the contraction in banks' lending to households would have eased further in August.

At the end of June 2024, bank loans to the non-financial private sector in the region continued to decline (-2.4% over twelve months), albeit to a lesser extent than in December 2023 (-3.8%). The decline eased further in the summer months (-2.0% in August, based on provisional data) for both businesses and households.

The capacity to repay loans remained high. In the average of the four quarters ending June 2024, the flow of new non-performing loans of banks and financial companies as a ratio of performing loans at the beginning of the period (deterioration rate) declined marginally to 1.1%, from 1.2% in December 2023. For the manufacturing sector, the indicator fell from 1.8% to 1.6%: mainly service companies contributed to the improvement, while there was a slight deterioration in manufacturing. However, credit quality has declined for small businesses. For households, the index remained stable at 0.8%.

The share of non-performing bank loans (measured gross of value adjustments already accounted for by banks) on total loans increased slightly. The indicator continues to be higher for businesses than for households.

During the first half year of 2024, there were weak signs of a deterioration in the timeliness of payments by companies: the rate of entry into arrears (defined as the proportion of new loans with late payments to performing loans, at the beginning of the period) rose to 1.2% in June (from 0.9% in December); the increase affected only floating-rate loans.

In June 2024, bank deposits of Piedmont households and businesses began to grow again (0.9% in June over twelve months, from -3.7% in December 2023). The still sustained increase in savings deposits and the easing of the decline in current account balances contributed to it.

The reorganisation of Piedmont households' portfolios toward more remunerative financial assets continued. Current account deposits fell again, while savings deposits rose further (-6.0% and +7.3%, respectively, in June over twelve months); overall, deposits decreased by 2.0%. The market value of securities held in custody at banks continued to grow: shares in UCITS, which account for about 50%, accelerated, but the positive trend involved all the various types of instruments.

Corporate deposits, usually characterised by greater volatility, grew by 9.1%; the value of securities under custody also rose sharply (17.8%).



The first half of 2024 saw a gradual increase in flows financed by European intermediaries equal to a value of € 235 billion, recording a modest growth of 0.40% compared to the same period of the previous year and a decline in the number of transactions by 1.9%.⁴

The consumer credit market in Europe

After the prolonged period of stagnation, the economy began its recovery with falling inflation. However, the increase in real household income did not translate into an increase in spending by individuals; on the contrary, it has led to an increase in savings rates due to continuing uncertainty.

According to the Eurofinas half-yearly survey, the sector was driven by the growth in consumer credit (+1.6%), which accounts for 73% of new disbursements, while other types of loans show a decrease of 2.7%, which was affected by the negative result of industrial loans (-13.3%). Marking a positive performance were loans for commercial vehicles, with a growth rate of 9.2%.

In the first half year, the personal loans sector grew by 7%. On the other hand, the performance in new loans for the purchase of vehicles worsened (-1.5%), where the data recorded show 0.3% for new cars, -3.1% for used cars and 4.6% for other vehicles (including campers and motorcycles).

In the third quarter, new disbursements continued their growth trend, recording +4.5%, mainly driven by personal loans (+4.8%) and loans in the automotive sector (+3.4%).

The aggregate figures show a growth in most national consumer credit markets of Eurofinas members. Italy is in line with the market average (+7.2).

Real disposable income is expected to strengthen and falling interest rates may reduce the incentive to save, likely supporting stronger consumption growth of 1.7% across the European Union.

During 2024, the growth in consumer credit activity strengthened, both in terms of loans disbursed (+7.5%) and in terms of the number of transactions financed (+8%). The recovery of the sector reflects the gradual decline in inflation and the return to more accommodating monetary policies, with the first reductions in interest rates starting from last June.⁵

The consumer credit market in Italy

Total disbursements of consumer credit recorded an increase of 5.8%, reaching volumes equal to a value of approximately € 90.3 billion and a number of 700 million financed transactions (+8.7%). Net of credit cards, the market recorded € 50.3 billion, an increase of 8.1% compared with the previous year, in line with the growth in the number of financed transactions (+8.2%).

⁴ Source: Eurofinas, Biannual & Q3, Statistical Report 2024.

⁵ Source: Retail Credit Observatory. Fiftieth and Fifty-first edition by Assofin, Crif and Prometeia; Assofin Observatory on Consumer Credit - Annual Survey 2023.



GLOBAL ECONOMIC TRENDS

The analyses of the Assofin Observatory show a recovery in financed flows in the first quarter of the year (+3.3%) compared to the same period of 2023, which continued and gained momentum in the following quarter (+6.5%), with a gradual increase in growth in the third quarter (+9.9%) and in the last part of the year (+10.6%).

As in the European market, personal loans led the way (+12.2%), consolidating the recovery path that began at the end of 2023. A significant contribution also comes from loans aimed at the purchase of cars and motorcycles disbursed to individuals at dealerships by captive and multi-product operators (+4.7%), in line with the evolution of the used car market and car and motorcycle registrations.

Loans for the purchase of other goods/services (belonging to sectors such as furniture, electronics and household appliances, goods for the energy efficiency of the home, mopeds and other goods and services that can be financed) recorded a slight increase of 0.1%, also thanks to the contribution of “small ticket” loans to support eCommerce.

Finally, the positive development in the last quarter of 2024 of loans to pensioners and private employees supported disbursements of salary/pension-backed loans, which wiped out the negative result recorded in the first months of the year.

According to forecasts, the consumer credit sector will continue to grow, albeit at a slower pace than in 2024, still supported by personal loans, which represent about 40% of total flows. The further recovery in purchasing power, eroded in the last two years by the strong inflationary wave, and the expected gradual reduction in interest rates by the ECB, will favour the use of credit by households in the future.

However, supply policies will remain vigilant on credit quality, affected both by the uncertainty of the macroeconomic scenario and by the transposition of the new Consumer Credit Directive, which will require industry operators to meet greater obligations on the assessment of consumers' creditworthiness as well as strengthened disclosure requirements.

The salary/ pension-backed loan segment in Italy

Salary/pension-backed loans recorded a modest recovery (+1.8%), reducing the decline recorded at the end of 2023 (-4.5%).⁶

New disbursements reached volumes of approximately € 6.1 billion, while the financed transactions showed a growth of 4% and an average ticket of € 16,900, down compared to the previous year, confirming a trend toward loans of smaller average amounts with a view to establishing sustainable repayment plans.

In detail, after the contraction in the first quarter (-6.3%), disbursements recorded a significant recovery in the second quarter, returning to positive territory (+0.7%) and an improvement in the second part of the year (+5.7% and 8.6% in the third and fourth quarter, respectively).

⁶ Source: Retail Credit Observatory. Fiftieth and Fifty-first edition by Assofin, Crif and Prometeia; Assofin Observatory on Consumer Credit - Annual Survey 2023.

**GLOBAL
ECONOMIC
TRENDS**

In support of the segment, we find loans granted to pensioners and private employees, which accounted for 50% and 20.4% of total flows with an increase of +6.9% and +4.6%, respectively.

Loans disbursed to public employees (29.6%) were instead down compared to the previous year (-7.4%), reflecting the negative figures of the entire period.



COMPANY
OPERATIONS

Mission and strategic design During 2024, the companies of the Cassa di Risparmio di Asti Group operated in an economic scenario characterised by strong volatility and uncertainty fuelled by the persistence of the Russian-Ukrainian conflict and the tensions on the Middle East front.

Nevertheless, they have confirmed their earnings capacity, operational efficiency and an improvement in structural strength, demonstrated by the capitalisation, liquidity, efficiency and quality indicators, continuing to pursue their mission with determination and realism during the year.

The results of the 2024 financial year testify to the Group's ability to identify and concretely implement effective strategic lines, confirmed by the fact that the results achieved are in line with the structural strengthening objectives set out in the 2022-2024 Strategic Plan, balancing the following constraints:

- to maintain the structural foundations which, thanks to the strategic decisions and the operating results of the last years, are solid and at high levels; in particular as regards liquidity, capitalisation, provisioning rates, the breakdown of NPLs into UTP/Past Due bad loans, financial leverage, efficiency and productivity ratios (net of charges and contributions to support the system) and the diversification of sources of income;
- to look towards the future, while achieving a good level of profitability, continuing to pursue development projects and the related investments (including the relative costs in the income statement) to further improve the service model, with a view to making its competitiveness more effective from a sales perspective and its organisation and work processes more efficient;
- to improve overall profitability (short and medium term) and the related cost/income ratio, to increase the size of indirect funding, especially in the asset management area, to reduce the percentage represented by gross and net non-performing loans on total loans.

The companies of the Cassa di Risparmio di Asti Group are confirmed as modern, fast and flexible commercial companies, able to compete with excellence in their local markets, seeking to build lasting relationships with Customers to achieve reciprocal economic advantages.

Disclosures required by ESMA ESMA has published its annual *Public Statement European Common Enforcement Priorities (ECEP) for 2024 annual financial reports* on 24 October 2024, in which it requires issuers to adequately consider impacts attributable to current events and issues when preparing IAS/IFRS annual financial reports for 2024, including related disclosures in the notes to the financial statements.

The document highlights the need for issuers to ensure, within the Annual Financial Report, an overall consistent report, to implement and monitor adequate internal control systems and to contribute to a high quality of annual financial statements. The disclosure that issuers must provide must be relevant, complete and adapted to the specific circumstances that characterise the institution and its activities.

In essence, the ESMA document aims to encourage the consistency and reliability of the financial and non-financial information produced by the issuers and,



consequently, to contribute to the proper functioning of the European capital market. Similar information requests were made by ESMA both in relation to the exogenous shocks that had affected the macroeconomic scenario of the 2020-2021 period, and that had mainly concerned Covid-19 disclosure, both with reference to the 2022-2023 period characterised by critical scenarios due to the war in Ukraine and the serious global macroeconomic consequences.

In addition to the general priorities that have characterised the documents issued by ESMA for some years now, the more specific priorities identified for the 2024 financial reports, to be adequately and concretely considered by the directors and management of the entities, can be traced back to the following points:

- liquidity risk management;
- accounting standards, judgements and significant estimates.

In the banking context, ESMA's considerations in terms of liquidity risk management must be focused on the *Liquidity Coverage Ratio* (LCR), the *Net Stable Funding Ratio* (NSFR) and the metrics required when submitting Pillar III.

With regard to considerations on the subject of significant judgements and estimates, in the banking area, entities must focus on determining the *expected credit losses* (ECL) and the management of so-called *Management overlays*.

The other appropriate analyses that must be specified in the financial reporting are those relating, for example, to impairment tests; for these, it is necessary to indicate the methodology used to calculate the recoverable value, the valuation assumptions and all the parameters used in the calculation.

The analyses of climate-related issues and the effects that these issues may have caused to varying degrees on financial data continue to be relevant for the 2024 financial statements.

As also resumed by Consob in its Warning Notice no. 2 of 20 December 2024, information on climate-related aspects must be structured in such a way as to cover, if deemed relevant, the risks, uncertainties and impacts on the financial statement items or the reasons for which no impacts were identified.

The priorities identified by ESMA with regard to 2024 sustainability reporting require entities to focus their attention on:

- materiality considerations in reporting according to ESRS. This involves providing information in relation to the double materiality assessment process, including considerations on activities, commercial areas, geographical areas and the types of stakeholders considered;
- considerations on the scope and structure of sustainability reporting, with specific reference to the information on the reporting scope and the extension of the information to the upstream and downstream value chain;
- considerations on the report required in relation to Article 8 of the Taxonomy Regulation, the use of standard reporting models and the consistency between the reporting of the Taxonomy and that of the transition plans where applicable.

For information related to ESMA's sustainability priorities, please refer to the document contained in this Report called "Sustainability Reporting".



COMPANY OPERATIONS

Climate change

ESMA stressed the importance for issuers to consider climate-related issues when preparing and reviewing the financial statements of financial intermediaries that apply international accounting standards to the extent that the effects of these issues are material.

The document published by ESMA also stresses that climate risk is becoming a significant factor that may affect the banks' expected credit losses (ECL) and that should be adequately incorporated into their provisioning framework. In this sense, ESMA therefore encourages a greater commitment to include climate risk in the valuation of adjustments for losses on loans and that this is adequately and transparently reflected in the financial statements.

Climate Change risks are divided into 'physical risks', linked to the physical impact of climate events, and 'transition risks', deriving from the adjustment process towards a low-carbon economy, related to changes in public policies, in terms of technology and consumer choices.

In line with the provisions of the “Supervisory Expectations” and the reference regulations, already starting from the data referring to the end of the 2022 financial year, the Bank conducted the materiality analyses on climate risk factors.

In addition, since the 2023 ICAAP exercise, climate and environmental factors have been identified as significant risk factors, in terms of potential impacts on “traditional” prudential risks. Consequently, the climatic-environmental risk in its two main forms (physical and transitional risk) indirectly became one of the potentially capital-absorbing risks (due to credit risk).

The component related to climate risk factors contributes to the determination of the stressed internal capital for the purposes of the assessment of the ICAAP prospective capital adequacy.

Also considering the negligible significance of the impacts (also in light of the materiality analyses carried out), to date climate risk has not been a factor considered in the determination of expected credit losses.

However, also in line with the provisions of the recent EBA Guidelines and in the wake of the desired greater effort indicated by ESMA, the Bank has planned an intervention in this direction as part of the ESG Plan.

For detailed information on the activities carried out by the Bank in the ESG area, please refer to the document contained in this Report called “Sustainability Reporting”.

The macroeconomic scenario – effects on company operations

The macroeconomic scenario in which the Group operated saw a slowdown in the Gross Domestic Product (GDP) of the Eurozone in the last few months of 2024. Economic activity, still sluggish in the industrial sector, also contracted in the services sector. Aggregate demand saw a decline in consumption and investments. Inflation remained at around 2%, despite the persistently growth of the services component, driven by items whose prices adjust more slowly.



In December, the Governing Council of the ECB further reduced the interest rate on deposits at the Central Bank by 25 basis points, bringing it to 3%. From a geopolitical point of view, the continuation of conflicts is characterised by potential openings towards diplomatic resolutions and therefore generates new balances. The effect of the US presidential elections on geopolitical relations and global economic policy has yet to be defined.

The previous decreases are being reflected in the cost of credit. In response to market developments and in light of the financial turbulence caused by the failures of some US regional banks and Credit Suisse in Switzerland, the Group implemented funding transactions that have allowed the partial early repayment of the TLTRO tranches.

The reduction in official rates is being reflected in the cost of bank funding and credit, in line with historical trends. Lending to non-financial companies contracted further amid persistently weak credit demand and still restrictive supply criteria.

The challenging climate in which businesses are operating, characterised by restrictive monetary policy and a slowing economic situation, can also be seen in the analysis of impairment rates of non-financial companies, which are increasing compared to the previous year. During 2024, loans in default increased in almost all economic sectors, although this increase is believed to remain stable in the following 2025-2026 two-year period. This eventuality has been duly taken into account in the planning activities.

During the second half of 2024, the Group commenced activities for the new 2025-2027 Strategic Plan, focusing on the planning of activities and assessment of the sustainability of the business model in light of changed reference macroeconomic and financial scenarios, which was approved by the Board of Directors on 6 February 2025.

As at 31 December 2024, the Commercial Network of the Parent Company was divided into 209 branches, a Private Network consisting of 20 Private Bankers, 113 Investment Advisors, a Business Network consisting of 41 Business Managers and 45 Business Advisors.

The commercial policy

The branches were broken down as follows: 60 in the province of Asti, 30 in the province of Vercelli, 30 in the province of Biella, 29 in the province of Turin, 12 in the province of Cuneo, 12 in the province of Milan, 10 in the province of Alessandria, 4 in the province of Novara, 4 in the province of Monza-Brianza, 3 in the province of Aosta, 2 in the province of Pavia, 2 in the province of Brescia, 2 in the province of Varese and 1 each in the provinces of Verbano-Cusio-Ossola, Genoa, Bergamo, Padua, Verona, Treviso, Venice, Imperia and Vicenza.

REGION	PROVINCE	NUMBER OF BRANCHES
PIEDMONT	ASTI	60
	VERCELLI	30
	BIELLA	30
	TURIN	29
	CUNEO	12
	ALESSANDRIA	10
	NOVARA	4



COMPANY OPERATIONS

	VERBANO-CUSIO-OSSOLA	1
LOMBARDY	MILAN	12
	MONZA-BRIANZA	4
	BRESCIA	2
	PAVIA	2
	VARESE	2
	BERGAMO	1
VALLE D'AOSTA	AOSTA	3
LIGURIA	GENOA	1
	IMPERIA	1
VENETO	PADUA	1
	VERONA	1
	TREVISO	1
	VENICE	1
	VICENZA	1
TOTAL BRANCHES		209

The sales network of Pitagora is mostly characterised by a direct and exclusive arrangement between the Company and the Financial agents, who work in sales outlets located throughout the country, of which there were a total of 84 as at 31 December 2024.

In the field of commercial policy, also during 2024, attention was focused on the needs of households, for businesses, especially small and medium-sized companies.

The Group gives priority consideration to the requests of the local communities it operates in: to this end, it has put in place policies to strengthen the synergies created over the years with local institutions and associations to support economic and social development. In addition, distinctive and qualifying elements for the Group have always been the degree of satisfaction, trust and loyalty of its customers: the Bank has invested heavily in these values, including the acquisition and customisation of a CRM tool, which allows it to optimise communication with customers, improve the level of service and, consequently, increase the attention paid to customers.

Among other things, the CRM tool is used by the Bank to define the “Happiness Index”, aimed at monitoring the emotional perception of the Customer during their *Customer Life Cycle*. The method adopted involves sending surveys via email to define the emotions and/or the role between the customer and Banca di Asti. Surveys are sent when specific events occur (currently following an appointment at the Branch or in the event of a current account being opened).

In the year 2024 (January – December), 31,266 questionnaires were sent to customers, with a completion rate of 62.19% and a response rate of 8.57%. The responses provided excellent feedback and the roles with which Customers most identify Banca di Asti are those of “Advisor” (in first position) and “Friend” (in second position).



2023-2024 Business Survey

In order to investigate the level of businesses customer satisfaction, to identify the Bank's strengths and potential areas for improvement, a survey aimed at businesses was created at the end of 2023 in collaboration with AstraRicerche. The main objectives of this survey were: to communicate to customers the focus on ESG issues related to sustainability, to raise awareness of subsidised finance and insurance coverage products and services and to highlight needs and requirements in the foreign sector.

The survey was administered to business customers, by sending a questionnaire via email and found a Redemption of more than 1,700 customers, who expressed a medium-high level of satisfaction also confirmed by the positive result of the Net Promoter Score. The latter figure shows that 75.1% of our business customers would recommend Banca di Asti to their families, acquaintances and friends. Among the competitive advantages with which the Bank differentiates itself most from its competitors, the focus on customer relations, staff competence, honesty and friendliness of the branches, confirming the strong territorial nature that characterises the Company, stand out.

The main ideas that emerged from the analysis (carried out in 2024) of the results of the Business Survey are as follows:

- the feedback gathered from business customers through the Survey confirmed customers' interest in investments related to sustainability and in particular the Transition Plan 5.0. These results strengthened the Bank's decision to create the *Sustainability Linked Loan*, a mortgage issued in October 2024. The mortgage is aimed at supporting businesses in the investments related to the Transition Plan 5.0 and at the same time has made it possible to expand the range of loans offered;
- the possibility of enhancing external communication on issues relating to subsidised finance also emerged. For this reason, events, conferences and meetings in the various areas of the territory in which the Bank operates and dedicated workshops (see the section dedicated to Conferences and events) were organised;
- other needs that emerged from the Survey concern:
 - o the optimisation of the Internet Corporate Banking platform, in order to offer greater ease of use. The Bank has already undertaken the process of renewing the platform, which is currently underway;
 - o the activation of the Instant Bank Wire Transfer product/service, on which the Bank is currently engaged in issuing activities.

From the analysis of the results of the satisfaction questionnaire addressed to business customers, the Business Marketing Office has also developed a commercial initiative called "Contattiamoli" [Let's contact them]. This initiative was designed starting from the 347 companies that responded in full to the Business Survey,



COMPANY OPERATIONS

providing their consent to the processing of personal data and privacy consent to be contacted.

On the basis of these names, the initiative was launched with the aim of:

- initiating contact with business customers in order to cultivate the relationship and possibly improve it or recover it in cases where the customer has shown a drop in the level of satisfaction with our Institute;
- taking a follow-up action aimed at providing the business customer with insights on topics of interest that were highlighted in the questionnaire.

The campaign was structured with a duration of five months and took place between August and December 2024.

The initiative was implemented via the Salesforce (CRM) platform. Specifically, the Business Marketing office has prepared and provided the relationship managers with a document containing a summary of the responses from the business customers who participated in the Survey.

Business product range

As regards the disbursement of loans to businesses, the consolidated presence in the relevant areas requires particular attention to be paid to customers' needs. This focus is mainly on micro, small and medium-sized enterprises, which, together with households, play a fundamental role in the social and economic context in which the Bank operates.

Also in 2024, Banca di Asti continued to provide support to businesses. Among the dedicated initiatives, the main ones are:

- loans of up to € 62,000 with a 100% ISMEA guarantee, targeted at SMEs active in agriculture and fisheries;
- loans backed by a guarantee up to 80% from the Central Guarantee Fund, targeting SMEs.

With regard to subsidised loans, our Bank continues to propose the main measures promoted by Finpiemonte, as part of the 2021/2027 PRP-FESR:

- “Energy efficiency and renewable energies in businesses”;
- “Digitalisation and production efficiency of businesses”, aimed at promoting the digital transition of the entrepreneurial system and supporting the competitiveness and sustainable transition of the regional production system;
- “Attracting and supporting the propensity to invest in the territory”.

Financial support takes the form of a loan granted and disbursed partly with Finpiemonte funds at zero interest and partly with bank funds at floating or fixed rates and of a non-repayable grant to cover eligible expenses.

In addition, the “Innovando Agricoltura” [Agriculture Innovation] and “Innovando Imprese” [Business Innovation] loan lines and the “Nuova Sabatini” [New Sabatini] subsidised loans were confirmed, mainly intended for Small and Medium



Enterprises (SME) and aimed at financing investment programs at particularly advantageous conditions.

In the agricultural segment, subsidised agricultural loans continued to be disbursed pursuant to "Italian Regional Law 63/78, Article 50", aimed at individual and associated farmers. To encourage the acquisition of new customers operating in the agricultural and agri-food sector in the Provinces of Brescia, Bergamo, Padua, Verona, Treviso and Venice, Banca di Asti has allocated a ceiling credit of € 30 million dedicated to grant loans on particularly favourable terms, secured up to 80% by the Central Guarantee Fund.

In 2023, the European Investment Bank had resolved a credit line in favour of Banca di Asti for a total of € 100 million that can be used for granting medium/long-term loans, mainly to support investment programs and working capital requirements of SMEs in the agricultural and agri-food segment. To this end, on 14 December 2023, the first tranche of € 50 million, used in 2024, was made available by the EIB. In order to further promote the initiative, the Bank created a ceiling credit line aimed at companies belonging to the agricultural and agri-food sector and another aimed at companies in the same sector run by young people under the age of 41. On 16 December 2024, the EIB made the second tranche available for an additional € 50 million. In addition, in November 2024, Banca di Asti had the opportunity to disclose the results achieved so far thanks to the collaboration with the EIB during the tenth annual EAFRD Conference in front of an international audience.

The partnership with Illimity Bank continues, for the referral of business customers, incorporated as limited companies, potentially involved in interest rate hedging services through OTC (Over The Counter) derivative financial instruments.

In 2024, the Bank continued its collaboration with Aosta Factor, a company active in the factoring sector since 1991 and part of the Finaosta Group, in order to further consolidate and diversify the set of credit services offered to business customer.

The offer to companies continued with short- and medium-term Minibonds, a bond instrument that represents a financial source complementary to bank lending and which makes it possible to reduce dependence on traditional forms of loan.

In addition, the synergistic collaboration with the company Credit Data Research Italia S.r.l. (CDR) continued to provide consulting services mainly for the access to subsidised finance contributions and incentive. The CDR's offer aims to encourage and incentivise investment opportunities for companies through a range of different instruments, in support of obtaining subsidised loans, tax credits, vouchers, non-repayable grants or at subsidised interest rates. In addition, further services are available to customers, including the creation of a transparent and comprehensive credit profile for commercial and financial counterparties, as well as support for the issue of environmental certifications, for safety at work or for regulatory compliance (e.g. GDPR) and for gender equality.



COMPANY OPERATIONS

The partnership with CDR generated positive impacts not only with reference to customers consulting services, but also with regard to internal training of the Sales Network; with this in mind, in September 2024, in collaboration with CDR experts, training sessions were organised for Business Managers and Business Advisors regarding the new Transition Plan 5.0, which provides for incentives in the form of tax credit in favour of companies that make investments in new technologies linked to environmental sustainability objectives.

During the year, Banca di Asti has consolidated its relationship with the company L'Imprenditore S.r.l., owner of the Leanus platform. This platform aims to implement pre-analysis tools to research and acquire new business customers, aiming at an informed and constructive dialogue with the entrepreneur. The initial assessment of potential new customers takes place through the access and analysis of financial statement data, the formulation of ratios, the calculation of the risk profile and the comparison with sector benchmarks.

New Sustainability-Linked loan and “Nuove Energie” [New Energies], “Risparmio Idrico” [Water Savings] and “Eventi Calamitosi” [Disaster Events] credit ceilings

In October 2024, the new *Sustainability Linked* loan product was released, aimed at supporting companies that:

- make new investments in production facilities, as part of innovation projects that lead to a reduction in energy consumption;
- apply for a subsidy to obtain a tax credit (up to 45% of the expenditure incurred) pursuant to Article 38 - Transition 5.0, of Italian Law Decree 19 of 2 March 2024 (converted into Italian Law 56 of 29 April 2024) and the Transition 5.0 Implementing Decree of the Italian Minister of Enterprises and Made in Italy in agreement with the Italian Minister of Economy and Finance, published in Official Journal 183 of 6 August 2024.

This new product is divided into 3 loan lines called:

- “Agricoltura Sostenibilità 5.0” [Sustainability Agriculture 5.0];
- “Innovando Sostenibilità 5.0” [Sustainability Innovation 5.0];
- “Nuova Sabatini – Linea Sostenibilità 5.0” [New Sabatini -Sustainability line 5.0]

These credit lines have zero application fees when the loan is granted, unless charging it if the company fails to produce specific documentation proving that the financed investments have been made.

In addition, Banca di Asti continued with the provision to business customers of the “Nuove Energie” [New Energies] and “Risparmio Idrico” [Water Savings] credit ceilings, equal to € 100 million and € 50 million, respectively, for the disbursement of medium-long term residential, real estate and unsecured mortgage loans. These loans include a 60% reduction in application fees and are aimed at the construction



of plants dedicated to the generation of electricity from renewable sources and precision irrigation systems, rainwater collection tanks, etc.

In view of the current climate changes and the increasingly frequent natural disasters occurring in Italy, the "*Plafond Imprese Eventi Calamitosi*" [Disaster Event Company Credit Ceiling] has been maintained to support companies that have suffered damage in the 2023/2024 two-year period due to natural disasters, with a ceiling of € 30 million at particularly advantageous interest rates. The credit ceiling provides for zero application fees.

Events and Conferences

In order to offer further opportunities for meetings and discussions between the Bank and Businesses, the following events were organised in 2024:

- conference "Sostenibilità: Rapporto Banca-Impresa" [Sustainability: Bank-Business Relationship], at the Mille Miglia museum in Brescia, where the topic of sustainability was examined in depth, with particular reference to regulatory developments in this area;
- conference "Imprese e sostenibilità: quando una necessità si trasforma in opportunità" [Businesses and sustainability: when a need becomes an opportunity]: held at the auditorium of the New Training Centre of Banca di Asti, it was attended by the Italian Minister of the Environment and Energy Safety, Gilberto Pichetto Fratin. During the event, the role of companies and institutions in the transition towards a sustainable model was explored in depth, focusing on key issues such as social responsibility, sustainable governance and energy efficiency. The event was attended by a number of local entrepreneurs who testified on how they are facing the change required by the new CSRD legislation and their vision on the transition;
- meetings in the Commercial Areas with the aim of informing Companies about the opportunities provided by the Transition Plan 5.0 and in collaboration with affiliated partners (see the paragraph above concerning the partnership with CDR).

These meetings were an opportunity to communicate to the Businesses that, with the entry into force of the new "Transition Plan 5.0", following the publication of the Italian Implementing Decree in the Official Journal 183 of 06 August 2024, a tax credit was established in favour of companies that in the 2024/2025 two-year period, as part of innovation projects, make new investments in production facilities, resulting in a reduction in energy consumption. The events organised in the area involved over 50 companies.

Training

During 2024, with a view to continuous training, a total of 18 courses (both in-person and online) were provided to Business Managers, Green Managers and Business Advisors, for a total of:

- Business Advisors: 1,363 hours;
- Business Managers: 1,056 hours;



COMPANY OPERATIONS

- Green Managers: 132 hours.

Furthermore, in the second quarter of 2024, a training activity for Business Managers and Green Managers was organised for the first time in collaboration with TMresearch SA. The course covered the topics of sustainability, the impact of CSRD regulations and the changes that companies will have to make in the future to adjust their business model to the standards set by the regulations and to remain competitive on the market. During the course, case studies were analysed and carried out to offer a concrete approach to the subject matter.

Following the numerous requests for training in the field of credit received from the Sales Network, at the beginning of 2024 the Credit Department and the Sales Department organised the course called "*Credit on the Job*", consisting of 3 days of face-to-face training with internal teaching. At the end of 2024, 48 days had been provided for a total of 222 participants. The course will continue and will end in the first quarter of 2025.

Private customer product range

Also in 2024, the Group continued to focus on individuals and families by means of specific initiatives and actions aimed at creating and consolidating long-term values in terms of trust and sustainable growth over time, as well as developing and strengthening the value of its relationship with the local area.

In the consumer credit sector, in 2024 the Bank paid particular attention to the needs of young people as they grow up, from schools and university education to the fulfilment of their life plans.

The commercial offer aimed at young people up to 30 years of age includes particularly advantageous rates.

To make the offer even smarter, young people who are Banca Semplice Home internet banking service holders can apply for and finalise the online "Erbavoglio Young 18-30 Online" loan which, in addition to the favourable rate, has no application fees.

The Bank has also confirmed its focus on training young people: a special offer has been structured for young students aged 30 or under who intend to attend a degree course, a master's course or a higher education school, reserving them a particularly favourable rate upon simple presentation of a document from the University/School certifying the enrolment request.

As proof of the importance of sustainable growth for the Bank, the commercial campaign "...muoviamoci con Erbavoglio" [... let's move with Erbavoglio] was also extended in 2024. The initiative provides for a particularly advantageous rate in the case of the purchase of a full-electric or hybrid vehicle of your choice including a passenger car, a motorcycle/moped, a bicycle or a scooter (whether or not taking advantage of any state tax incentives).



We also continued to offer the product Erbavoglio Gold, which is part of the traditional Erbavoglio line and provides for the beginning of instalment payments 6 months after the loan is granted. To safeguard and at the request of the Customer, optional insurance policies specifically created to cover the risk of premature death and permanent disability, loss of employment or total temporary disability can be combined with Erbavoglio.

Lastly, again in the consumer credit area, with the cooperation of the subsidiary Pitagora S.p.A., reporting activities on customers interested in salary/pension-backed loans, in the Anticipo TFS/TFR (TFS/TFR Advance) and in Piccolo Prestito (Small Loan) continued.

In the area of mortgage loans to private individuals, the Bank has acted on several fronts:

- to deal with the persistence of the situation of instability of interest rates, the offer of the mortgage loan called "Casanova Rata Protetta" [Casanova Protected Rate] has been extended, giving the peace of mind of a predetermined maximum rate ("CAP") if a certain threshold of the benchmark (6-month Euribor) is exceeded;
- again in order to offer customers maximum flexibility even in periods of market instability, the offer of a range of "option" mortgages continued, allowing customers to opt, after three, five or ten years from signing, to the conversion of one's mortgage from a floating rate to a fixed rate and vice versa;
- since January 2024, the "option" range has been joined by the Mutuo Rata Certa [Fixed Rate Mortgage], to meet the needs of customers who opt for the peace of mind of a predetermined monthly payment even in the event of an increase in interest rates: the new mortgage provides for a constant instalment (determined when agreeing the economic conditions) and a term of 20 years. In the event of an increase in rates, the instalment remains constant and the duration of the amortisation plan is extended up to a maximum of 35 years;
- in accordance with government measures, support for private customers has been confirmed for 2024 with the possibility of joining, if in possession of the envisaged requirements, to the Solidarity Fund for the Purchase of the First Home (the so-called "Gasparrini Fund").
- in February 2024, participation in the Fondo Prima Casa [First Home Fund] managed by CONSAP was finalised: the participation has been an important addition to the commercial offer, responding to the need for access to credit, even for young/single-parent families. The Casanova mortgages that can be collateralised by the Fund guarantee are Casanova Rata Fissa, Rata Variabile and Rata Opzione 3 anni [Fixed Rate, Floating Rate and 3-year Option Rate] (fixed or variable initial rate).

The Group is aware that the financial world plays a fundamental role in raising awareness and supporting customers towards greater social, environmental and economic sustainability and, in line with the ever-increasing attention to these



COMPANY OPERATIONS

issues, it has already launched a study in 2021 aimed at defining offers of "green" products and services.

These issues, of great importance and impact, constitute a material challenge also in light of the complex general macroeconomic framework.

With the aim of offering a concrete sign of the Bank's sensitivity towards environmental issues, a new "Mutuo Green T" [Green T mortgage] credit ceiling was created, which provides a particularly advantageous rate in the event of the purchase of "sustainable" residential properties. The initiative has already been extended throughout 2025.

Also in support of the mortgage loans segment to individuals, the Bank continued its collaboration with the Network of Credit Brokers for the presentation of private Customers interested in applying for a loan from the range of "Casanova" mortgage loans for purchase and restructuring, including work in progress, of residential properties falling within the scope of real estate loans to consumers. The Network of Brokers allows the Group to become better known, especially in recently established areas, offering customers or potential customers easier access to credit, also with specific dedicated initiatives.

The range of current accounts offered by the Bank to private Customers consists of a plurality of products able to meet the different needs of Customers: from the "Conto di Base" [Basic Account], with the social purpose of guaranteeing the banking inclusion of the weaker segments of the population, to the "Conto Pensione" [Retirement Account], reserved for customers with limited needs for access to banking products and with low annual fees, to the "Su Misura" [Custom Made] range, ideal for customers who wish to secure a number of transactions included against a fixed fee. The "Conto 8ttimo" [Optimum Account] is dedicated to newly acquired Customers, a package account with a decreasing fee depending on the products or services used by the customer.

The "No Profit" current account is instead an account at favourable conditions dedicated to Non-Profit Organisations and Bodies, and to Religious Bodies and Orders as well as to their members.

To meet the needs of actual and prospect customers who prefer to operate independently (online or at ATMs), the Simple Web Account is available as of 2021, and can be accessed independently *online*.

Particular attention was paid to the offer of current accounts for young people up to 30 years of age, all offered free of charge (except for tax charges). The offer is divided according to defined age groups:

- "Io Conto 0 – 17" [I count 0 to 17] is the account for children between the ages of 0 and 17, created with the aim of offering them greater independence and operational flexibility (in particular from 14 years of age) in light of the changing needs of children. For the age group from 14 to 17 years, the Current Account can be accompanied by a particular version of the Nexi



- Debit Consumer Card, called “Carta IO CONTO”, and the Banca Semplice Info service, also offered free of charge;
- “Conto Semplice Junior Job” [Junior Job Simple Account] is a free current account for young workers aged between 15 and 17, which allows them to credit their earnings and is offered together with a free card to manage their earnings independently;
 - “Conto Semplice Young 18 - 30” [Young 18-30 Simple Account] is the current account dedicated to young people aged between 18 and 30. The account is free of charge (except for tax charges) and provides for a deposit return. Other advantages are also offered to these young people, such as the free “Giramondo Pay” international contactless debit card, the free “Banca Semplice Home” service and the “Nexi Classic” credit card with the annual fee discounted by 50% compared to the standard offer. Young people aged between 18 and 30, holders of at least 100 Banca di Asti shares, can also request the “Nexi Classic” credit card free of charge.

In consideration of the great success of the previous edition of the initiative, which led to an increase of 65% in new *Young 18-30* current accounts opened, the updated version of the “SBAM” campaign was also proposed again in 2024: to all prospect customers who subscribed a *Young 18-30* current account or a Conto semplice *Web Online* [Simple Web Account online] with single name within the period of the initiative, two unique vouchers with a total value of € 300 in credits were distributed.

After logging in to the dedicated platform, customers had the opportunity to freely spend the Credits in their possession, choosing from the experiences specifically selected together with the partner of the TLC Italia initiative.

The reference Target remained unchanged compared to that of 2023 (young people aged between 18 and 30 who do not yet hold a current account with the Bank) as well as the methods of participation.

In 2024, collaboration continued with Somet Group companies, So.Met Energia S.r.l. and Piemonte Energy S.p.A., to offer a qualified electricity and natural gas supply service to the Bank's Private and Corporate Customer segments.

As part of the offer to Customers of diversified products and services, the catalogue also includes the long-term rental service in partnership with a new supplier, Motus S.r.l. a company with solid experience in the rental sector, which offers flexible and customised solutions based on the Customer's needs: a single monthly instalment that includes insurance, maintenance, accessory services, tyre change, roadside assistance and substitute car.

As for the subsidiary Pitagora, the Company operates in the consumer credit market through a distinctive business model characterised by an efficient organisational structure capable of responding professionally to market needs, by focusing on customer relations and by a specialised distribution network that can cover the whole of Italy and guarantee proximity to banking partners.



COMPANY OPERATIONS

In 2024, company guidelines directed commercial activities in core areas with the aim of improving the Company's economic performance, confirming support for its customers and a more sustainable development model.

The Company, in line with the direction taken in previous years, has confirmed a commercial policy consistent with a business-to-partner strategy that has allowed it to consolidate its collaborative relationships with the main banking institutions, specialised consumer credit operators and web comparison sites, proving to be a successful model in the development of the product range. This made it possible to take advantage of partners' network of branches, while maintaining a direct relationship with customers; in this way, Pitagora was able to offer its financial products, guaranteeing local proximity through the widespread distribution of its sales network and the satisfaction of the customer's credit need through a specialised, qualified and effective service. In this sense, also for a better approach to the new customers targets, Pitagora has strengthened the digitalisation processes, through the use of remote communication IT systems.

The marketing policies adopted to satisfy the needs of consumers and the distribution network have been aimed at offering financial products to cover the needs of the market.

During the period in question, Pitagora continued to periodically monitor its commercial offer in order to evaluate the consistency of the products over time with respect to the interests of the customers who use them, as well as the reference sector, also with the aim of identifying any need to modify and/or expand the products, which was evaluated in the development of future projects. In line with its growth strategy, Pitagora is constantly active in analysing new markets and innovative channels that could expand the customer base, intercepting additional credit needs.

In 2024, the Company also continued its commercial relations with the Group and further strengthened its "open market" relations with BDM Banca, Cassa di Risparmio di Orvieto (Mediocredito Centrale Group), Banca Popolare di Puglia e Basilicata, Cassa di Risparmio di Bolzano e Civibank (Sparkasse Group), from which positive results emerged, as well as confirming collaborations with historical partners.

On 26 January 2024, Pitagora, confirming the excellent results with Banca Popolare di Puglia e Basilicata, renewed the exclusive promotion agreement.

In the reference period, the commercial partnership relationship with the Iccrea Cooperative Banking Group, which has 114 banks and 2,500 branches, has had an increasingly significant development in strategic terms, also thanks to the investments and synergies put in place, reaching volumes equal to € 220 million for the salary/pension-backed loans segment, with an increase of +20.3% compared to the previous year, in addition to € 5 million for the TFS Advance (end of service indemnity) product.



As regards We Finance, in 2024, it continued its mission of distributing core products and, by virtue of a brokerage agreement, those provided by the parent company that supplement the commercial offer.

With a view to continuous improvement, We Finance has made its sales processes more efficient with a view to green and multi-channel strategy, thanks to technological innovation that has made it possible to activate and implement the digitalisation of processes through remote video recognition tools and digital signatures via OTP.

The Company has also promoted initiatives for the development of the sales network and for the enforcement of commercial actions aimed at acquiring new customers, adopting marketing policies that have contributed to the growth of the business.

Direct Channels

2024 was characterised by the finalisation of the project to transfer the POS service business unit, which then took place at the end of 2023. In fact, all the services sold were renegotiated and around 5,000 terminals were migrated to the systems of the new partner Numia, a migration that will end in the first half year of 2025. This laborious activity made it possible to achieve an important economic objective, before the time envisaged by the agreement, represented by the earn-out of € 5 million. At the same time, the network began to offer the new Numia services, centralising operations at the headquarters. Therefore, the offer to customers was renewed with the integration of the traditional catalogue with new additional services not previously available. An IT process was also started in 2024 that will lead to the sale of Numia products and services in full autonomy by the local network, an activity that will become fully operational in the first half year of 2025.

In the issuing sector, the new "Io Conto" [I count] card was introduced in the catalogue, dedicated to 14-17 year-olds, which aims to meet the initial financial independence needs of teenagers. It is a Nexi Debit card that operates on the dedicated MasterCard circuit, and can be used online and in Italy and abroad. Enriching the current "Io Conto" [I count] commercial offer lays the foundations for a stable, solid and lasting relationship of trust, adequately enhancing and consolidating the relationship with young customers over time and allowing young people to gradually become familiar with saving and acquiring decision-making and economic autonomy appropriate to their age.

Also in the issuing sector, the project, with the partner Nexi, of a new corporate credit card aimed at medium-large companies that will be added to the product catalogue in the first half of 2025.

During 2024, several commercial campaigns were launched relating to AMEX credit cards and Telepass products, which allowed us to achieve good economic objectives with these two partners.

The proposition of *Satispay* to merchants in combination with POS continued, and also in this case good economic objectives were achieved.



COMPANY OPERATIONS

With regard to Telematic Services, 2024 was dedicated to the creation of the new Corporate Banking platform, working alongside ION. The platform, entirely recreated, will have a new, much more user-friendly *layout* and new features that will make the product one of the most innovative on the market. The work carried out in 2024 will lead to the first migration phase, which will presumably be completed by the end of the first half of 2025 for approximately 26,000 users.

The dissemination of digital services to customers continued, increasing the number of active utilities in both the retail and corporate areas, bringing the percentage of dissemination of Internet Banking services, information or devices, on all current accounts, to 83%.

Online Branch

As part of the development activities of a commercial and customer relations nature, the OnLine Branch is active, staffed by people with previous experience in the Bank's branches. The organisation has extended opening hours and offers advice to customers who use internet banking to activate the bank's products and services completely remotely, thanks to the use of digital signatures.

The consulting is also extended to non-customers of the Bank, through the offer of an online current account, completely digital and activated from the website www.bancadiasti.it.

The central element of the operations of the Online Branch is the relationship with the Bank's customer, offered by qualified personnel duly trained for the purpose.

The OnLine Branch communicates with customers through e-mail, SMS, WhatsApp, telephone and video channels, through which it is possible to support the Customer remotely.

Through the OnLine Branch channel, it is possible to access the following products and services remotely:

- Personal loans of up to € 15,000;
- Giramondo Pay Debit Card;
- Carta&Conto, card that can be topped up via IBAN;
- Nexi Prepaid, prepaid card;
- Credit Card with balance setting;
- "Conto Corrente Semplice Web" [Web Simple Current Account] for prospect and actual customers;
- activation of the Internet Banking service through video-selfie recognition;
- activation of the BancaPiù service, which allows extensive transactions via a personal Debit Card;
- remote signing of contracts to open credit facilities on a current account with a digital signature;
- post-sale remote signing of various forms and contracts with a digital signature;
- renewal of personal master data and residency documents;
- due diligence questionnaire.



Compared to the previous year, in 2024 the OnLine Branch grew by 12% in the number of telephone contacts managed and by 26% in the total number of documents signed remotely, confirming the need for customers to operate with adequate support and qualified consulting.

The OnLine Branch, together with the other structures of the Bank, is working to make more and more services available with the aim of satisfying the need of customers to operate and receive advice on the channel - both physical and online - of their choice.

With regard to the design and innovation of its services, in 2024 the OnLine Branch worked to enrich the Bank's online channel as well as the digitalisation and multichannel processes. The objective is to release during 2025 and progressively in the following years:

- the improvement of the customer's signature experience, moving from the use of three-year qualified digital signature certificates with PIN (Personal Identification Number) and OTP (One Time Password via SMS) to those with only the use of the OTP;
- the revision of the "Per te" [For You] section of the Internet Banking app. The objective is to convey the Bank's services in a more modern and multi-channel perspective, allowing the Customer to interact with the Online Branch and with the branches in a simpler and more immediate way;
- the revision of the process of opening an online account from the Bank's website, making it more intuitive and faster with the possibility of using SPID for identification, extending the opening functions also to a specific digital collection product;
- the improvement of internal processes in order to allow the remote subscription with digital signature of multiple products and services, also in the corporate area.

From a training point of view, during 2024 all personnel of the OnLine Branch participated in specific training courses, both technical and related to customers management soft skills, in order to further improve the quality of the service provided. To this end, a method for collecting customer feedback through optional surveys will be gradually released.

The subsidiary Pitagora, with a view to continuous improvement, has streamlined its sales processes, management of the loan life cycle and customer re-contact during the contract renewal phase with the aim of maximising customer loyalty to the brand.

To this end, the Company has also made further investments in order to implement web marketing activities and provide potential customers with an alternative channel to the traditional one and to that of partnerships.

Specifically, it has developed commercial initiatives and marketing campaigns on social media, SEO, SEM, YouTube, Spotify and Netflix, improving its strategy and web presence.



COMPANY OPERATIONS

An analysis of the website's performance shows that 374,985 views were generated, of which 120,041 were new accesses by users and/or visitors. 33.2% of traffic was via PC and desktop, while the remaining 66.8% was via mobile, a trend reversal compared to 2023.

The use of SEM and PMax campaigns, promotional videos on the YouTube channel and advertisements on social media channels generated 17.6 million impressions and 533,113 clicks, with a propensity to access via mobile devices (97%) and only residually via desktop and tablet (3%).

These significant data contributed (as well as to the growth of the business) to an optimisation of the brand exposure.

As for the online channel, relations with operators active in the area of comparison of household loan offers have also been consolidated. In particular, the collaborations with Younited SA, Facile.it, Prestitionline and Agos Ducato, as well as the initiatives related to web marketing campaigns, have made it possible to achieve volumes exceeding € 200 million, an increase compared to 2023 (+13%).

Banking Centre

The Banking Centre is a consolidated entity within the Direct Channels and Communication Service and confirms its mission of managing relations and providing assistance to the Bank's Customers, in line with the strategic policies of the Banking Group. During the year, agents provided specialised assistance on the use of internet and mobile banking platforms dedicated to private customers, and supported a cluster of merchants interested in POS migration.

With the consolidation of the structure, the Banking Centre is increasingly becoming the point of reference for customers, who thus have the opportunity to communicate directly with the Bank's staff, without the intermediation of complex automatic responders, chatbots or bots, and during extended hours compared to the opening hours of the commercial network. The Banking Centre staff, consisting of 8 agents, 1 team leader and 1 manager, is operational from Monday to Friday from 8 am to 10 pm, on Saturdays from 8 am to 2 pm and on public holidays when the stock exchange is open from 8 am to 6 pm, to provide support to the online trading function, in the event of platform anomalies.

The Banking Centre has also proved to be a valid safeguard in limiting the effects of fraud.

To maintain the service at excellent levels, the Banking Centre relies on the help of the outsourcer that manages overflow reports. In 2024, reports handled externally stood at 1%, mainly at the time of unforeseen events, such as platform malfunctions that lead to a sudden increase in reports.

During the year, the Banking Centre's activities were characterised by the introduction of innovations such as:

- the continuous evolution of the tools to support operations: the adoption of Service Cloud Voice, the Salesforce function for the management of the



contact centres that integrates all the channels of contact with the Customer Relationship Manager, made it possible to consolidate the use of the tool and adopt the innovations that become available, aimed at optimising the processing of the calls, thus obtaining efficiency:

- the controlled processing flow has been improved and is now more streamlined and fluid;
- monitoring dashboards have been created, personalised for each agent, which show the performance KPIs of the individual operator in real time, compared with the team average. Thanks to this information, each operator is able to independently manage the pace of conversations and, in the less busy moments, make specific calls, open second-level reports, provide training and carry out administrative activities, without the intervention of supervisors who maintain control of the team's progress through dedicated dashboards. The increase in operational autonomy allows each agent to be their own team leader, in harmony with the rest of the group. This implementation earned the Banking Centre the title of *Best in Class* in the *People and Culture* section of the annual *Customer Service Maturity Model 2024*, drawn up by the consulting firm PricewaterhouseCooper, with a score of 78/100, compared to the average of 62/100 in the Banking industry;
- the callback functionality has been optimised with the introduction of a control that prevents customers from booking the callback when there is already a pending request;
- customer satisfaction survey for the assistance received: a customer journey was created that sends an email every hour to customers who have contacted the Banking Centre. The questionnaire consists of a single question and requires a rating from 0 to 10. The results of the first six months of the survey were encouraging: from June, the date of introduction of the survey, at the end of the year 34,648 e-mails were sent with an average response rate of 26% and an average score of 9.31;
- anomaly resolution communication sent to customers following contact due to a malfunction of the platforms, to inform them of its resolution. This service is highly appreciated by customers who have immediate evidence of the restoration of operations, without having to call for assistance.

Agent training plays an important role: Banking Centre staff have taken preparatory courses to maintain specific qualifications in finance and insurance; some agents have taken English language courses on a voluntary basis to enable them to provide assistance to foreign customers as well. In addition to this, there is continuous training on soft skills for everyone, which is essential to keep motivation high and strengthen the spirit of belonging to the team, improve communication and listening skills, maintain and enhance empathy, patience, and the ability to handle long-distance relationships and conflicts.

The collaboration with the universities continued: the Banking Centre hosted three students on work experience who assisted and supported the staff in providing the



COMPANY OPERATIONS

service. During the internship, students acquired in-depth knowledge of digital channels and enhanced soft skills, confirming the highly formative value of the experience, thanks to which they enriched their curriculum vitae.

The Bank's Members Project

In order to consolidate the bond with our Member customers, the "Iniziativa Soci" [Members Initiative], a project launched in 2011, has been renewed for 2024. The project envisages exclusive services, especially in the healthcare sector, with the possibility of accessing, at subsidised rates and/or free of charge, to dedicated programmes such as "Bonus Salute" [Health Bonus] and "Voucher Salute" [Health Voucher], to preventive medicine paths based on specific check-ups and specialist examinations, and to insurance and payment services.

The initiative also offers all the Bank's Members a cultural proposal, both through the "voucher museo" [museum voucher], which allows them to visit exhibitions held at museums and affiliated organisations, and through participation in the traditional musical show during the Christmas holidays.

An additional benefit is envisaged with regard to environmental sustainability issues, which provides for owners of an electric or hybrid-plug-in car, a recharge bonus, which can be used at charging stations throughout Italy.

Foreign sector

The global economy in 2024 was characterised by moderate growth, persistent inflationary challenges, a strong focus on geopolitical issues and a growing drive towards technological innovation and green transition.

The export sector showed signs of resilience, with a variable trend. Exports relating to agri-food provided significant positive contributions, also by virtue of a non-cyclical demand, while the mechanical engineering sector remained stable overall. The Italian system has paid for the crisis in the automotive sector, but the diversification of exports, both in terms of products and end markets, has made it possible to face the challenges of international trade.

As regards imports, on the other hand, there was an increase in volumes due in particular to higher purchases of non-durable consumer goods and intermediate goods.

In general, for the next few months the trend of international markets will be strongly affected by the developments of the war conflicts currently underway, by the measures adopted by the US government to regulate the import and export of goods (custom duties, restrictions, quotas) and by the trade agreements between the United States and other countries for the possible derecognition of these trade barriers.

During 2024, the Bank invested in the internal training of its personnel, in order to strengthen technical-specialist skills regarding risk management and internationalisation strategies. In order to support companies in seizing the opportunities for development and growth on the international scene, the Bank has



maintained a constant and continuous dialogue with the entrepreneurial community, helping it to reduce risks, optimise cash flows, manage international payments and find appropriate solutions to the challenges of the market.

Banca di Asti aims to consolidate its position in the international trade segment, maintaining its commercial offer, with financial solutions dedicated to the constant care of the relationship with the customer.

Financial sector

In the area of funding and investments, the economic context of 2024 recorded a return to strong competition among banks and saw our Group concentrate on pursuing the objective of creating a constant and lasting relationship over time with the own customers.

In line with the context, the Bank in 2024 structured its offer giving particular attention to direct deposits, through its own fixed and floating rate bond issues and the use of fixed and step up rate time deposit accounts, as well as to managed funding, realised through the proposal of mutual investment funds, portfolio management services and investment insurance policies.

During the year 2024, the volume of managed assets increased steadily, obtaining excellent feedback from customers and contributing to the increase in both invested assets and the overall service margin.

Through a wide range of mutual investment funds and the asset management service, our customers have been able to invest by increasing the level of diversification of their portfolio thanks to the expertise and professionalism of our dedicated staff.

In the asset management service sector, our customers have shown great interest in the Trainer range, which was already widely used in 2023. This is a range of accumulation asset management schemes that, through the execution of a planned investment programme in shares and/or bonds, builds an internationally diversified portfolio over a predefined time period.

Customers are supported by both the Directors of our branches and by specialised personnel, such as Investment Advisors and Private Bankers, to create a personalised allocation of their portfolio through consulting and reporting tools.

In the financial-insurance sector, as in previous years, the “Helvetia Multimix” product has welcomed the membership of our customers. This is a whole life multi-segment policy that combines the satisfaction of needs for protection and investment growth with inheritance, legal and personal tax benefits in the life insurance segment. Also in the pension sphere, the year 2024 saw a further increase in subscriptions to the “Helvetia Soluzione Previdente” [Helvetia Prudent Solution] pension fund, thanks to both the growing awareness on the issue of supplementary pension plan and the personalised consulting of our professionals.



COMPANY OPERATIONS

Insurance and Welfare Sector

Since 2007, Banca di Asti has launched and promoted the “Assicurazioni in Banca” [Insurance in Bank] project, through partnerships with important insurance companies, including Helvetia, CNP, AIG, Nobis and Groupama.

During 2024, the insurance sector again consolidated a high volume of premiums for a total of approximately € 73 million, with the aim of increasing these volumes to € 86 million during 2025.

With the Company Helvetia, the range of products in the catalogue has been expanded. The Company has prepared a new type of coverage, in compliance with the legal provisions required following the change in the relevant legislation (Official Journal 247 of 21 October 2022), calling it "Helvetia Decennale Postuma Indennitaria L210".

This is a stand alone policy that partially replaced the product already in use by the Bank called “Helvetia Decennale Postuma Indennitaria” and which has the following characteristics:

- it is aimed at construction companies or real estate companies;
- it protects buyers of residential properties with building permits issued starting from 05 November 2022;
- it is mandatory for the stipulation of the purchase and sale agreement.

In 2024, thanks to the collaboration with the company CNP Assurances, the product called "Doppia Vita" [Double Life] was introduced to the catalogue; it is a temporary life insurance policy, collective with individual membership. Doppia Vita is the new insurance solution specifically designed by the Company to protect the Participants - Natural Persons in the event of an irreversible event, whatever the cause; in fact, in addition to the indemnity in the event of death, the policy provides a Bonus if the insured survives the policy's expiry.

With the company AIG, on the other hand, the previous product called “Amministrand&O Plus” was repealed and the new product Private Edge Bancassurance Amministrand&O (hereinafter Private Edge Amministrand&O) dedicated to the Corporate sector, was introduced in the catalogue from July 2024.

The product structurally has the same group of guarantees as the previous product, listed below:

- Basic Guarantee: Manager's liability (mandatory);
- Additional Guarantee: Civil liability of the Company (optional);
- Additional Guarantee: Company liability deriving from the management of employment relationships (optional).

It also offers the possibility of supplementing these guarantees with numerous innovations, such as additional guarantees not previously present and the modulation of the maximum coverage limits based on specific business needs.

With regard to regulatory aspects, the competent bodies of the Bank have approved the update of the "Group Policies on Insurance Distribution" in 2024.



This update provides for the redefinition of the methods of offering non-life insurance products (also including the motor class) and "life protection" so as to make the distribution model more consistent with the product catalogue currently in place. In particular, the placement of products belonging to the non-life classes continues to be carried out in accordance with the results of the so-called "*Demand and Needs*" questionnaire (which investigates the customer's needs and requirements) and following the positive outcome of the Product Suitability questionnaire (prepared by the Manufacturer), in order to guarantee the customer a high level of protection, without, however, the additional formulation of personalised recommendations (i.e. advice). The changes made to the methods of distribution of non-life and "life protection" insurance products also make it possible to align the methods of offering products in the catalogue with those obtained from brokers with whom the Bank has (or may in the future enter into) agreements for horizontal collaboration.

No changes are expected for insurance investment products (IBIPs), whose placement continues to be carried out under consulting services, due to the type of particularly complex product and the express regulatory forecasting in this regard.

With regard to the so-called "*Demand and Needs*", in January 2024 the Chief Executive Officer of the Bank has approved, by a specific resolution, the update and integration of the questionnaire for the assessment of customer needs and requirements, introduced following the entry into force of the IDD regulations in October 2018.

To date, the questionnaire has made it possible to identify the areas of customer need at "macro" level, through a series of questions, so as to be able to identify the basket of products offered by the Bank through which to meet the insurance needs that have emerged.

In order to identify the needs of customers with a greater level of granularity, starting from April 2024, the D&N questionnaire has been supplemented with some more specific questions that allow to better target the products offered in the catalogue, or rather products distributed through insurance brokers, as already provided for by the Insurance Distribution Policies in force.

With specific reference to its commercial relations, the Group has for some time been developing collaborations with insurance companies that are sensitive to ESG issues and that are active in the community with social, cultural and environmental projects.

Banca di Asti and Salutissima SMS ETS (Salutissima Società di Mutuo Soccorso - Ente del Terzo Settore) have also been collaborating strongly in the "Welfare" area for over 15 years. In fact, Salutissima offers Health Plans through its Supporting Members (of which Banca di Asti is the major supporter), true partners of the Mutual Aid Society, which allow their clients to identify the most suitable solution easily and effectively for their needs and those of their family.



COMPANY OPERATIONS

The Group is complemented by the integration of additional free services such as, for example, telephone legal advice, a free subscription to a health and wellness magazine and the possibility of taking advantage of discounted rates to benefit from health services in the numerous affiliated centres in the area.

In addition to the clinic inaugurated in 2023 in via Carso 15/B in Biella in collaboration with the Primo Dental Centres, in 2024 it was the turn of the “New Health Services Centre”, opened in Corso G. Ferraris in Asti. The dream of realising this project has its roots in 2017 when FAB SMS, now Salutissima, wanted to translate the concept of mutuality into a modern key to get closer to the territory and offer services related to health and well-being.

This project was made possible thanks to our partnership with Hastafisio, who in recent years had been looking for a plan for further development and growth. Its history began in 1993 as a rehabilitation centre, and it became a health centre in 2001, with the addition of a sports medicine service and a medical clinic. Its journey has led it, over time, to being what it is today: a local reference for the assistance and treatment of the health problems of people of all ages.

The Centre, designed according to the principles of Industry 4.0 - innovation, technology, digitalisation, research and development - stands out for its accessibility and inclusiveness, both from an architectural and operational point of view, thanks to smart systems for patient bookings and care.

The healthcare facility consists of four operating units:

- Physiotherapy, or rather a Level 1 Functional Rehabilitation and Recovery Centre equipped with modern technology and run by qualified professionals who base their therapeutic choices and strategies on the evidence of scientific research and on the needs of each individual.
- a Sports Medicine centre;
- a multi-specialist medical Clinic;
- a Radiodiagnostic service centre for first level examinations (radiology, mammography, ultrasound) and second level examinations (magnetic resonance) provided by JB Medica with latest generation technologies.

During 2024, the range of Mutual Plans dedicated to Banca di Asti customers was expanded, with the introduction of health coverage dedicated to target customers defined as “Private”. These customers have the opportunity to take advantage of unlimited maximum coverage for hospital services for singles and/or the entire family and high maximum coverage for other out-of-hospital services (e.g. diagnostic tests, specialist visits, physiotherapy, reimbursement for lenses, etc.).

In line with the philosophy and values that characterise Salutissima SMS ETS, it aims to spread the values of the Culture of Well-Being, understood as “feeling well”, developing and supporting projects linked to the seven pillars on which the services that Salutissima provides to its clients are based: medical care, assistance, prevention, dental care, telemedicine, nutrition and exercise. In addition, “Salutissima SMS ETS” promotes and supports other educational,



cultural and research activities aimed at health prevention and the dissemination of healthcare values, as well as social initiatives for the benefit of the entire community.

The “Camper della Salute” [Health Camper] project continues, which in 2024 saw its participation in the “Banca di Asti Private - Golf Tour 2024”, a sports event dedicated to the Bank's Private customers, in collaboration with Golfindustria ASD. Seven stages dedicated to well-being and movement were organised where Salutissima, through the “Camper della Salute”, offered participants free health prevention services.

The goal for 2025 is to further increase the membership base, which to date has over 47,000 patients and 16,000 families.

As for the subsidiary Pitagora, during the financial year the Company has developed synergies with leading insurance companies to cover its credit risks in order to offer a high-level and competitive product, also with a view to containing financing costs.

In particular, Pitagora has consolidated its partnerships with AXA France Vie, AXA France IARD and Net Insurance, Net Insurance Life, MetLife Europe Limited, HDI Assicurazioni, Cardif Assurance, Harmonie Mutuelle, Iptiq Life (Swiss Re Group), Allianz Global Life and BCC Vita, specialised partners in the field of insurance coverage and protection from credit risks and/or life insurance coverage, mandatory for salary/pension-backed loans.

With a view to expanding the range of insurance companies and the diversification credit risk in compliance with internal regulations, two new agreements were signed with UnipolSai Assicurazioni S.p.A. and CNP Assurances S.A.

In compliance with its Insurance Concentration Policy, the Company has implemented rules for the valuation of policies to be combined with financing operations, by conducting ex ante checks to ensure the fulfilment of specific qualitative and solidarity requirements by the insurance companies, such as the possible assignment of a rating by ECAI agencies Standard & Poor's, Fitch and Moody's, recognised by the Bank of Italy, also with a view to assessing 'Credit Risk Mitigation' requirements.

Pitagora also conducted a benchmark analysis on the premiums applied by the main insurance companies operating in the salary/pension-backed loans, in order to assess the best pricing conditions and allow for a reduction in business costs.

This survey has confirmed that the insurance costs applied by Pitagora's partners are in line with the market and, with specific regard to coverage of loans to private sector employees and pensioners, are among the best within the scope of the reference market.

During the year, We Finance also continued to consolidate its partnerships with leading insurance companies to cover its credit risks.

In particular, We Finance has maintained its partnerships with AXA France Vie, AXA France IARD, Net Insurance, Net Insurance Life, HDI Assicurazioni, Great American International Insurance Limited, Cardif Assurance, Iptiq Life, ElipsLife (Swiss Re



COMPANY OPERATIONS

Group) and Allianz Global Life, specialised partners in the field of insurance coverage and protection from credit risks and/or life insurance coverage, mandatory for salary/pension-backed loans.

At the same time, in order to diversify the insurance policies covering the financial products offered, the Company has signed new agreements with (i) CNP Assurances S.A. to cover the risk of death of customers employed in the public, state, semi-public and private sectors, (ii) Accredited Insurance (Europe) Limited to cover the risk of using credit lines repayable through salary/pension backed loans or payment delegation and (iii) UnipolSai Assicurazioni to protect against the risk of death of retired customers.

Communications: advertising and public relations

During 2024, advertising and communication activities were characterised by various campaigns, among which the institutional one promoting the consultancy service stands out. The objective of the campaign, which allowed for the sharing of both commercial and institutional messages, was to transmit trust in customer relations, emphasising the importance of personal relationships with customers.

From April to August, the campaign called "SBAM" involved prospect customers under 30, allowing new customers who opened current accounts to receive a credit of € 300 to be spent on their passions: gaming, food delivery, travel, music and much more.

From a commercial point of view, a significant return was recorded with an increase of over 65% in accounts opened compared to the historical average. In addition to the "SBAM" campaign, in order to promote the "Io Conto 0-17" current account, a specific commercial advertising activity was carried out in the second half of the year.

In collaboration with the EIB (European Investment Bank), the allocation of funds has been promoted, dedicated to support the investment and working capital needs of small and medium-sized enterprises. In addition, specific campaigns have been launched to promote business funding aimed at supporting water saving, the energy reclassification of buildings, the construction of photovoltaic systems and business efficiency as set out in the Transition Plan 5.0.

The end of the year was characterised by the launch of campaigns dedicated to the Erbavoglio loan, including that relating to the loan for sustainable mobility.

During the year, information campaigns were carried out on institutional social media to prevent online scams and raise awareness of sustainability.

To mark the Christmas holidays, a greeting campaign was created, focusing on relationships and dialogue both at the branches and online to realise dreams and projects together with one's Bank.

The different advertising messages have been conveyed on each occasion by means of traditional communication tools (printed materials) and innovative ones (social media) which can also be displayed on smartphones, tablets and PCs, and digital signage.



In 2024, the process of bringing the Bank more on social platforms continued, a process that saw the company more active on the three channels LinkedIn, Facebook and Instagram.

Promotional activities

Sponsorship activity has mainly focused on supporting initiatives of a sporting, cultural and social nature, favouring entities, associations, companies or groups that are already customers and in all events operating on served areas; these interventions confirm the Group's interest in associating its name with activities that animate the life of the communities and territories in which it operates, with a good return in terms of image.

The Bank's presence was assured at the events held in the area: among the most significant were the Sagre (food festivals), the Douja d'Or, the Palio and the Magico paese di Natale (magical Christmas village) in Asti, Asti Musica and Asti Teatro, Fattoria in città (farm in the city) in Vercelli and the "Escher" exhibition at Palazzo Mazzetti in Asti and the "Steve McCurry" exhibition at Palazzo Gromo Losa in Biella.

Also in 2024, Banca di Asti confirmed its support for the awarding of the 2023/2024 scholarships in collaboration with Fondazione Cassa di Risparmio di Asti and UniAstiss. The initiative provides for the granting of a scholarship of € 500 (gross of any legal deductions) for each student of the Secondary Schools of Asti and the Province, or resident in the Province of Asti who has attended a school outside the province and that, in the 2023/2024 school year has graduated with a score of 100/100.

In order to concretely raise awareness on issues related to ESG factors, in particular in the Social area, several projects were sponsored that had schools as protagonists.

On 21 and 22 November, on the occasion of the International Day for the Elimination of Violence against Women, the Bank's auditorium hosted the 'Vittorio Alfieri' High School for "Rompiamo il silenzio" [Breaking the silence], an intense activity to raise awareness on the issue of violence, in the form of two conferences to which important speakers and experts contributed.

The Bank has also joined the Progetto SOS Donna [SOS Donna Project], created by the Mani Colorate Association, in collaboration with the Regional Council's Elected Women's Board, the Asti Local Health Authority and the Municipality of Moncalvo. Schools in the Province participated in the project by creating twenty-one commercials to say "Chiedi aiuto" [Ask for help!] and to inform women who are victims of violence of the emergency numbers 112 and 1522. The commercials were presented on Thursday 12 December in the auditorium of Banca di Asti.

Events

A number of different events were organised during the year, including:

- Vinitaly: the Bank actively participated in the event with the presence of a stand in the Piedmont pavilion;



COMPANY
OPERATIONS

- Christmas concert dedicated to Shareholders: 19 performances in 8 theatres, hosting approximately 14,000 people;
- “Sostenibilità: rapporto Banca-Impresa” [Sustainability: Bank-Business Relationship] conference in Brescia, aimed at business customers to address the important issue linked to sustainability and its impacts on businesses;
- Conference “Imprese e sostenibilità: quando una necessità si trasforma in opportunità” [Businesses and sustainability: when a need becomes an opportunity] in Asti at the Banca di Asti Auditorium. The event, dedicated to the business customers of Banca di Asti, saw the participation of the Italian Minister of the Environment and Energy Safety, Gilberto Pichetto Fratin, and was a useful opportunity for sharing and discussing issues related to sustainability;
- Campus Giovani e Innovazione [Youth and Innovation Campus]: an event to celebrate and reward the innovative ideas of the Bank’s young employees;
- Convegni Transizione 5.0 [Transition 5.0 Conferences]: together with the Business Marketing Office and in collaboration with the CDR, conferences were organised in the various areas of the Bank to talk to actual and prospect companies about the Transition 5.0 Plan, sustainability and energy efficiency.

Human resource management The management of Human Resources in the Banca di Asti Group aims to enhance the skills of people and to direct the corporate culture in a manner consistent with the Group's objectives, through a resource management system based on the systematic involvement of the Company's various organisational structures. The gradual refinement of management tools is aimed at encouraging an ever greater focus on motivational levers, communication and propensity for change.

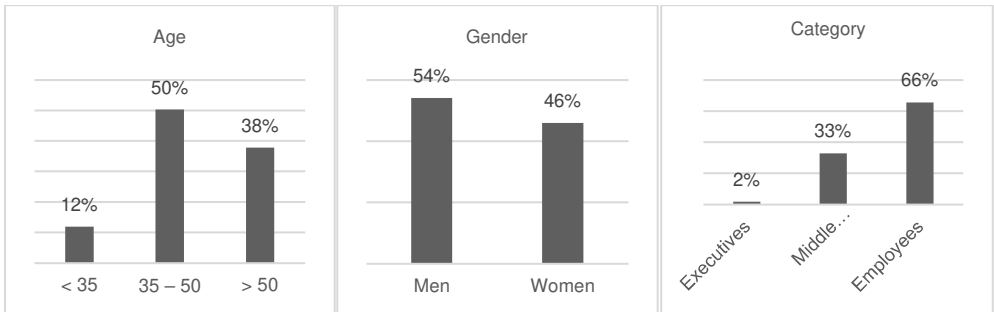
As at 31 December 2024, there were 1,888 employees, an increase of 61 units compared to the previous year.

In continuity with 2023, also this year, in addition to the search and selection methods already in use, the hiring and recruitment of human resources in the workforce continued to be carried out using the staff temporary employment contract for an initial duration of six months, renewable for a further six months if necessary, thus being able to assess, over an adequate time period, the professional characteristics and operational contribution that the people identified will be able to guarantee, in order to assess their permanent employment.

The graphs below show the breakdown of personnel by age, gender and category.



COMPANY
OPERATIONS



In support of the growth paths and professional development of personnel, evaluation systems operated during the year, with a special focus on performance evaluation. In line with previous years, the policy of staff turnover aimed at enriching and speeding up the pool of experience and skills continued.

The CR Asti Group in its value creation process considers forms of capital that represent essential intangible resources such as intellectual capital, human capital, and social-relational capital. In particular, intellectual capital contributes to the development of our distinctive characteristics and therefore to the creation of value, working in synergy with both human capital and social-relational capital. With regard to human capital, its quality is crucial for the Group's growth and, consequently, for sustaining long-term value creation. People — through their wealth of knowledge, the skills developed and strengthened over time, their managerial capabilities, commitment, loyalty, and sense of belonging — are a central element of all company activities, and must be protected and ensured their rights. Finally, as for social-relational capital, it has enabled the Group over the years to gain greater market share and become a significant player in its reference market.

Training activity

The challenges imposed by the market and digital evolution, the level of complexity and professionalism need in the work environment and their continuing evolution, involve a widespread awareness of the central nature and importance of human capital. Training is an aspect of the highest significance in enhancing individual skills and for steering the business culture in line with tactical and strategic objectives.

Throughout 2024, in line with the previous year, great importance was given to in-presence training at the new Training Centre, to allow employees to benefit from the advantages of active interaction, in particular with regard to behavioural/relationship courses. The return to the classroom was accompanied by multimedia training/FAD (remote learning), which mainly concerned more technical topics. Personnel were therefore able to continue their training in Smart Learning mode directly at their residence/home or at the Organisational Unit to which they belonged, facilitating the completion of training and limiting travel, also with a view to sustainable mobility.



COMPANY OPERATIONS

Overall, Banca di Asti staff benefited from 11,960 man/days of external webinars, video lessons, e-learning/classroom and on-the-job training activities, involving 1,609 employees and an average of over 54 hours per participant.

The 2022-2024 three-year Training Plan was designed to pursue the following objectives:

- to identify the training initiatives functional to the development and professional growth of resources, through the adoption of a digital system aimed at mapping the level of acquisition of skills through the assessment of behavioural indicators and the consequent construction of specific development plans;
- to meet the regulatory requirements for the qualification of personnel knowledge and skills and for the governance of operational risk;
- adapting skills to strategic lines and business objectives, designing training courses that contribute to the achievement of objectives in line with the strategic and organisational choices declared in the 2022-2024 Strategic Plan.

In 2024, events dedicated to Managers and Young People continued, in order to enhance resources and their specific skills, through collaboration with leading training companies, such as Training Meta and Ambrosetti, specific for Executives and Managers, and Consea for young people.

For the latter, the Interfunctional Networking Laboratory was launched in 2024, with the aim of creating an environment dedicated to innovation and collaboration among people with different skills. The first initiative developed by the Laboratory was the *Campus Giovani e Innovazione*, with the main objective of testing new organisational models that can improve efficiency, creativity and the ability to solve complex problems. The Campus was attended by over 200 young people, under the age of 35, divided into 56 teams that presented the same number of projects. Each team received an invitation to a day of training on Project Management, useful for the development of the project: to this end, 5 editions were provided for a total of 1,485 hours of training.

Particular attention was paid to specialist training, developing courses linked to the role held, as well as individual courses aimed at obtaining certified qualifications in the financial and insurance fields.

The annual Training Plan was structured into the following Subject areas:

- "Management - Behavioural Training" targeted at enhancing the management skills of personnel and relations, included in career paths relating to the role of Director/Deputy Director and Office Managers of the Head Office.
- "Formazione ESG" [ESG Training], intended to contribute to the evolutionary path towards the integration of ESG (Environmental, Social, Governance) factors in the Bank's business models, with the aim of generating shared value for all stakeholders; the Bank also renewed its participation in the "ESG Advisor" programme organised by ABI Formazione



and EFPA, intended for Investment Advisors and Private Consultants and aimed at acquiring European certification; during the year, two editions of the course "ESG Corporate – La filiera sostenibile" [ESG Corporate – The sustainable supply chain] were also held, dedicated to Business Managers and designed thanks to the collaboration between TM Research and the Business Marketing Office.

- "Formazione Commerciale" [Commercial Training], useful for strengthening the action of commercial structures and for empowering and enhancing the value of individual collaborators, managers dedicated to specific customer segments and product managers: in particular, an important initiative has been launched, aimed at younger people, entitled "Il modello negoziale di Banca di Asti" [The Banca di Asti negotiation model] aimed at developing a common style in customer consultancy.
- "Formazione Specialistica" [Specialist Training] aimed at encouraging an understanding of the activities carried out and an awareness of the role held within the company as well as to explore certain topics in order to boost the professional/job profile; A significant effort has been dedicated to training in the credit sector, with 10 editions provided to the Network, with the aim of developing specific skills through operational courses. Again in the area of specialist training, 12 cyber security training editions were provided, involving over 400 employees.
- "Formazione Neo Assunti" [New Employee Training] aimed at encouraging the hiring of new resources who took up service during the year, providing them with specialist knowledge both in the regulatory field and in branch operations.
- "Regulatory Training" focused on updating skills with respect to regulatory provisions. During 2024, in continuity with the previous years, particular emphasis was placed on training regarding "Salute e Sicurezza sul lavoro" [Occupational Health and Safety], subject to ISO 45001:2018 certification; in the anti-money laundering sector, meetings continued on the subject of reporting suspicious transactions and customer due diligence.

In the area of personnel training, in 2024 the Group subsidiaries Pitagora S.p.A. and We Finance S.p.A. continued to provide training modules with the aim of maintaining the companies' constant commitment to promoting professional and personal development, contributing to the collective success of their respective organisations.

Overall, the personnel of Pitagora S.p.A. and We Finance S.p.A. received 4,354.5 hours of training including webinars, classroom activities, e-learning and live streaming contents.

The subsidiaries' 2024 Training Plan was designed to achieve the following objectives:

- provide employees with the information and skills necessary to carry out the tasks assigned;



COMPANY OPERATIONS

- increase the professionalism of employees through the enhancement of their knowledge and skills;
- meet the regulatory obligations in force for the specific sector.

The 2024 Training Plan was structured into the following Subject areas:

- “Formazione Manageriale” [Managerial Training] aimed at enhancing the resources and project management skills, intended for personnel holding middle management or executive positions;
- “Formazione ESG” [ESG Training] intended to contribute to the evolutionary path towards the integration of ESG (Environmental, Social, Governance) factors in the Company's business models;
- “Formazione Cyber Awareness” [Cyber Awareness Training], intended to raise awareness among personnel on the issue of IT security, with particular attention to the development of the knowledge necessary to deal with the constant evolution of cyber attacks;
- “Formazione Specialistica” [Specialised Training] aimed at providing advanced knowledge and specific skills necessary to increase professional performance;
- “Formazione Continuativa – Obbligatoria” [On-going - Compulsory Training] focused on updating competences with respect to regulatory provisions. During 2024 in particular, we continued with the compulsory training on ‘Health and Safety at Work’ and the training for newly hired personnel with a focus on the following modules: Labour Legislation, Privacy, Anti-Money Laundering, Transparency, Legislative Decree 231 and Administrative Offences, and Cyber Security.

With regard to the subsidiary Pitagora, in 2024 the Company continued its training activities aimed at both employees and the agents' sales network.

As regards the sales network, in order to guarantee training continuity, both in the phase of registration in the List held by the Agents and Brokers Body ('Organismo Agenti e Mediatori' or OAM) and the periodic professional updating for agents involved in financial activities who are already registered, Pitagora availed itself of the support offered by the trade association Assofin (Assofin Formazione).

In detail, the training course of 30 hours was provided to 250 participants through an e-learning platform, which allows the filing of the attendance register and teaching materials provided by the lecturers, as well as the conduct of a test to verify the knowledge acquired, as well as the issuing of a certificate in the case of successful outcome of the aforementioned test.

This training activity focused on the activities of the Organisation of Monetary Agents (OAM, Organismo degli Agenti Monetari) and the activities of the Banking and Financial Ombudsman (ABF, Arbitro Bancario Finanziario), with an in-depth look at the most relevant issues for the consumer credit sector, namely the technical and regulatory aspects of the various forms of financing other than leasing, factoring, salary/pension-backed loans; the elements of credit rating, payment services, and in particular: the activity of the OAM in the last year; the point on the salary/pension-



backed loans; Assofin observatories and the trend of credit to households; banking intermediaries, financial intermediaries and credit intermediaries; ethics and professional correctness; factoring, leasing and granting of guarantees; the activities of the ABF in the last year; the institutional system responsible for the regulation and control of the financial system; organisation and functioning of land registers and fulfilments relating to the sale and purchase of properties; cryptocurrencies vs. Digital Euro; artificial intelligence and the challenge of its regulation; financial and credit intermediation and digitalisation: the importance of sustainability and inclusion; as well as the regulation:

- on anti-money laundering and anti-usury matters with analysis of legislation, reference practices of ABF rulings and case law guidelines;
- on transparency;
- on the administrative liability of entities;
- on consumers protection;
- on the protection of personal data and the administrative liability of legal entities.

The Company has also organised classroom training days at the parent company site, which involved the entire sales network. This initiative, in which the various central functions also took part, was an opportunity to improve skills and best practices in order to improve services, as well as an opportunity to discuss daily business operations.

During 2024, training activities continued being strongly incentivised, also through the Academy for potential candidates interested in taking on the role of financial agent directly conferred by Pitagora (the “*Prospect Agents*”).

Pitagora has adopted a system of quality indicators for the work of its Network, monitored monthly by the Risk Management Function; verification activities are also carried out through the Internal Audit Service by means of remote and on-site analyses, as well as by virtue of the service agreement in place with the Compliance Function.

Furthermore, Pitagora devotes considerable attention to the training of the Network, aimed at fostering the acquisition of technical operating skills and capabilities directly necessary for the exercise of the profession, as well as the achievement of appropriate levels of theoretical knowledge and communication with customers.

As regards the subsidiary We Finance S.p.A., training activities in 2024 focused mainly on the fulfilment of regulatory obligations. More specifically, the company dedicated space to the training of the Network, aimed at mandatory professional updating for the collaborators of Agents and Brokers. In addition, the employees were involved in a joint training session with the employees of Pitagora S.p.A. on the subject of “Aggiornamento Operatori del Credito” [Updating Credit Operators].

Sustainability is a central element of the 2025-2027 Strategic Plan; during 2024, the Cassa di Risparmio di Asti Group continued along the path it took many years ago, developing an ever-greater awareness of sustainability issues and how they can

**The environment
and ESG issues**



COMPANY OPERATIONS

impact the activities of the Group, which aims to be an active partner in the transition towards a production and consumption model that pursues the objectives of environmental neutrality, respect for human rights and good corporate governance for the benefit of the People, Businesses and Communities in which it operates.

With particular reference to environmental aspects, the Group promotes the reallocation of own financial resources and those of third parties to private and public initiatives that improve the climate and environmental impact.

During 2024, in line with the Group's ambitions and in compliance with what was defined as part of the sustainability plan, integrated into the 2022-2024 strategic plan, numerous initiatives were developed.

With regard to sustainable business, referring to financing solutions aimed at the reduction of environmental impact, the following products have been released:

- the "Mutuo Green Tea" [Green Tea Mortgage] credit ceiling for individuals, aimed at the purchase of properties with high energy efficiency and low physical risk;
- the commercial initiative "Muoviamoci con Ervavoglio" [Let's move with Ervavoglio] which provides for the disbursement of a personal loan for the purchase of a full-electric or hybrid vehicle;
- the "Nuove energie" [New energies] credit ceiling aimed at companies for the financing of plants dedicated to the production of electricity from renewable sources;
- the "Imprese risparmio idrico" [Water savings companies] credit ceiling to finance investments aimed at promoting water saving;
- the "Sostenibilità 5.0" [Sustainability 5.0] product for companies that intend to join the Transition 5.0 Program of the NRRP.

With reference to direct environmental impacts, the Group built a photovoltaic field and installed photovoltaic panels for the production of renewable electricity, has signed contracts for the supply of 100% electricity from renewable sources and has made the company car fleet available to the internal offices of the Parent Company more efficient, converting the company car fleet to hybrid power. In addition, a circular economy initiative was launched, donating decommissioned company mobile phones to the Jane Goodall Institute, which used the proceeds from the recycling and recovery of the devices to support a solidarity initiative in Tanzania. Finally, activities to improve plant/build efficiency continued and the Environmental Management System certification (ISO 14001) for the Parent Company was confirmed.

In the next three years, the Group intends to continue by intensifying its commitment to support its own transition process and that of customers.

For more details, please refer to the 2024 Sustainability Report, included, in a specific section, in this Report on Operations of the Group's consolidated financial statements.



During 2024, the achievement of the objectives outlined in the Strategic Plan continued.

The use of agile and waterfall methodologies in the management of initiatives has contributed to achieving the expected results with gradual and constant progress.

The comprehensive programme of planning, experimental and operational initiatives in the Plan has been completed with the collaboration of various departments of the Bank and Group companies, and the objectives set for 2024, in line with the 2022-2024 Strategic Plan, have also been achieved.

The multi-year projects relating to the review of E2E processes, the AIRB project concerning the use of an internal model for the purposes of asset quality capital, Digital Collection and the Enhancement of the Insurance Segment project, which see 2025 as the crucial year for the conclusion of activities and the achievement of the final objectives, are proceeding according to plan.

The Group's "2024 portfolio" included 7 re-engineering of E2E business processes, 9 projects, 4 Laboratories and 2 specific projects of the Pitagora company.

Among the initiatives carried out with important results already achieved, the following can be noted.

Business Process Reengineering E2E

The 2022-2024 three-year period represented a period of profound re-engineering of the main core processes, also thanks to the enforcement of the multi-year strategic project "Review of E2E Processes". This group of 7 initiatives focused on the radical revision of the selected operating processes from an integrated and digital perspective, with the primary objective of increasing operational efficiency and customers experience from an end-to-end perspective.

The working methodology adopted, characterised by cross-functional collaboration, iterative analysis phases and a customer-centric approach, has made it possible to achieve tangible results that meet expectations.

2022 focused on collecting needs, identifying areas for improvement and opportunities for efficiency through the conduct of an in-depth *Business Process Analysis* that involved numerous internal players. This was followed by the subsequent *Implementation Analysis* phase, which translated the results of the BPA into concrete actions and made it possible to identify the solutions to be adopted and the roll-out plan.

2023 focused on the technical and operational review of the processes resulting from developments, *User Acceptance Testing* and the incremental release of the analysed solutions (*Minimum Viable Product* - MVP), all with an agile approach to ensure maximum flexibility and adaptability to constantly evolving needs.

The releases implemented in 2024 resulted in significant improvements in multiple areas of intervention. The main operating processes (Account, Mortgage, Registry, Funds and Asset Management) were redesigned in order to achieve greater efficiency, through the automation and simplification of interactions among users. Furthermore, the introduction of the DBX ecosystem, an aggregator of existing



COMPANY OPERATIONS

software platforms, has enabled digital and multichannel workflows that allow the interconnection of previously used but unconnected information systems, thus laying the foundations for future developments.

The DBX ecosystem, combined with the implementation of Advanced and Evolving Electronic Signature, has significantly simplified the execution of contracts and made it possible to reduce the number of signatures required.

Integrating the DBX Registry platform with internal and external databases has further enhanced the availability of data for creditworthiness analysis and supported system data management. Furthermore, there is a reduction in document filing time, faster personal data management and simplified onboarding of new customers.

With the activation of the DBX Conto Corrente [Current Account], greater speed has been achieved in the opening of Current Accounts and in the activation of the services placed through the sales platform, even remotely, with the simultaneous reduction of the time necessary for the execution of contracts and simplification of documentation.

As far as mortgage loans are concerned, thanks to the DBX Credit platform, a faster process for the approval of applications has been implemented, with greater efficiency in the processing of requests and a simultaneous reduction in rework.

Also for Business Credit, shorter times for the approval of financing applications have been consolidated, together with greater management efficiency and guided document collection.

In the Funds and Asset Management sector, more streamlined processes have been introduced for the input of client instructions, faster and dematerialised contractual subscription and easier order management (DBX Wealth).

At the Anti-Money Laundering (AML) level, the review of the process was launched in order to automate the management of Know Your Customer activities, with the aim of reducing times and operating expenses and allowing multi-channel interaction.

The initiatives implemented during 2024 brought tangible benefits to all stakeholders, including an increase in operational efficiency, thanks in part to more streamlined processes and reduced processing times, as well as an improvement in the customer experience resulting from accessible and personalised digital services. The digitalisation of processes and the reduction in the use of paper have contributed to sustainability; innovation and the adoption of advanced technologies have contributed to strengthening the competitive positioning in the digital and youth-oriented market.

During 2025, the enhancement of the already available platforms will continue in agile mode, as will the release of the *Detection* platform in the Anti-Money Laundering field, already at an advanced stage of development and *User Acceptance Testing*, for a data-driven analysis of the events detected.



The objective that drives the ecosystem of platforms already created is to continue generating value through the constant evolution of procedures, digitalisation and a particular attention to customer needs.

Acquiring POS project

The Acquiring POS Project, born in 2023 with the strategic objective of launching a partnership with a counterparty specialised in transactional and digital services, after having allowed the collaboration with Numia S.p.A. (formerly BCC Pay S.p.A.) and, at the same time, valued the commercial assets of the Bank, generating a capital strengthening, continued in 2024 on the front of the consolidation of the partnership.

In line with what was contractually defined between the parties, in 2024 the re-negotiation phase of all POS customers for the part relating to the International Circuits was completed, which allowed the accrual and collection of the first *earn-out* of € 5 million. The second variable component provided for in the framework agreement is linked to the achievement of a transactional margin ratio of 100%, to be verified at the end of the 2026 financial year.

The proposition and sale of the new Numia POS terminals was also launched.

The project made it possible to manage the delicate phase of contracting the services, to manage relations with all the parties involved, such as Cedacri, C-Global and Numia, both in the technical/operational phase of POS migration relating to the international acquiring service and in the IT integration between the Cedacri front-end applications, usually used by the Banca Network, and the new Numia application for commercial proposals.

The completion of the IT integration phase among the parties and the migration of the International Circuits are planned by the end of the first half year of 2025.

A-IRB project

At the conclusion of the on-site inspection, which ended with Report Prot. no. 926064-23 of 24 May 2023, the Bank of Italy authorised the Cassa di Risparmio di Asti Group, pursuant to Article 143 of EU Regulation 575/2013 ("CRR") to use this system, on an individual and consolidated basis, for the exposure classes "Retail" and to "Companies", provided that certain remediation actions detailed in the measure itself are implemented within 18 months of receipt of the inspection report, concerning the entire pool of banks sponsoring the AIRB initiative, as well as additional specific actions to be undertaken by the Bank.

Following receipt of the Authorisation Measure, the Bank has defined and initiated the activities necessary to carry out the various remediation measures, within the deadlines set by the Supervisory Body, activating the "AIRB – Remediations" project. As part of this project, both the specific activities carried out by the Bank and the remediation activities shared within the AIRB pool of sponsor banks are monitored.

During the year, the preliminary remediation actions in the areas of Governance and Validation, already formally completed in the second half of 2023, were fully



COMPANY OPERATIONS

implemented and effective; in addition, the remaining remediation activities relating to non-priority findings continued according to the plan defined by the Bank together with the other AIRB Sponsor Banks.

ESG project

The multi-year ESG project, which began in 2022, was completed in 2024 with the achievement of the objectives in the 2024 Plan. During the three-year planning phase, the guidelines were outlined and the evolution path of Banca di Asti was mapped out with the aim of further improving its positioning in the field of sustainability, seizing new business opportunities in line with regulatory developments. Specifically, the initiatives included in the Plan have reached an overall progress of 95%.

The transition from the strictly design phase to the integrated and widespread management of ESG issues took place progressively during 2024 and ended in December 2024 with the start of work on defining the ESG component of the 2025-2027 Strategic Plan.

The implementation of the ESG strategies of the 2025-2027 Strategic Plan will be managed and implemented by the company departments, under the constant coordination and guidance of the ESG and Sustainability Office, which was set up during the planning phase and will be operational as early as 2023.

Digital Collection Project

In 2024, the Raccolta Digitale [Digital Collection] project was launched with the aim of increasing savings collection and acquiring new customers digitally with a specialised online product.

The fundamental steps involved the evaluation of strategic rationales with particular reference to the implications on the organisational structure, the associated benefits and risks, as well as the operating costs generated.

The business case was developed and approved, outlining the expected benefits, the estimated costs and the risk analysis, followed by the feasibility study to assess the technical viability. This was followed by the project set-up phases and the evaluation of the IT partner to ensure a solid basis for the orderly and effective execution of the project.

The operational implementation plan has also been defined and launched, and includes both a technological and a commercial part, the latter focusing on brand identity initiatives for the product launch on the digital market. The clear objectives made it possible to complete the analyses on schedule and quickly start the implementation phase, which is still underway.

DORA project

On 27 December 2022, the EU Digital Operational Resilience Act Regulation ("DORA Regulation") was published in the EU Official Journal; it entered into force



throughout the EU on 16 January 2023 and was directly applicable from 17 January 2025. To meet regulatory requirements, the DORA project was launched at Group level in October 2023, with the support of the consulting company PWC.

The first phase saw the completion of the assessment and gap analysis with respect to the requirements of the Regulation, which was followed by the development of a remediation plan currently being finalised.

The project, which actively involved numerous internal players as well as the subsidiaries Pitagora and We Finance, entailed the review and updating of most of the main operational processes in the ICT and Risk Management areas, as well as a broader review and strengthening of all internal regulations.

During 2024, the main activities completed, aimed at DORA compliance, include: the definition of the methodology for identifying essential or important functions (FEI - Funzioni essenziali o importanti), the implementation of additional security measures, the evolution of the Business Continuity Plan, the definition of a framework for the complete management of ICT assets, the implementation of an ICT risk management framework aimed at responding resiliently to ICT incidents, the definition of a framework for periodic and continuous testing to assess operational resilience, the adoption of incident monitoring and management mechanisms with timely reporting to stakeholders and a more structured management of ICT service providers to ensure compliance with adequate security standards. The interventions aim to make the Group robust and resilient, able to effectively deal with cyber threats and incidents.

Workshops

As part of the 2022-2024 Strategic Plan, the three laboratories focused on Data Driven Banking, Direct Channels and Business Communication and Consultancy (Your Advisor) have continued their activities. The common objective was to analyse the market, select suitable partners, test and implement innovative technological and organisational solutions to improve the relationship with customers, simplify the sale of products and services and optimise internal processes.

Over the course of the three-year period, the *Data Driven Banking* laboratory has developed new methods to analyse customer data, allowing a personalised offer of banking services. In addition, it has given rise to implementation projects, going beyond the experimental phase, with a strong focus on the enhancement of the data.

With specific reference to 2024, the Data Driven Banking Laboratory has extended the application of the methodological framework to other sectors, allowing for better management of human resources and commercial performance. The use cases developed have led to an increase in operational efficiency and a reduction in manual activities, thanks to the implementation of advanced data analytics and reporting solutions. More generally, a solid foundation has been created in terms of skills and technologies, paving the way for the generation of value from the strategic asset of data.



COMPANY OPERATIONS

The Direct Channels and Communication laboratory explored new features for Internet Home Banking and the integration with Fintech and Insurtech, facilitating remote access to services via App, PC and smartphone. It also brought the value of the User Experience (UX) into E2E projects to support omnichannel. The implementation activities supported by the IT Partner Cedacri Gruppo ION have made it possible to develop the technological infrastructure and continue to enhance the functionality of the platform from a user experience perspective through new methods of recognition, signature and use of services, including remotely.

The *Your Advisor* laboratory focused on strategic and operational consulting, supporting the development of business and industrial plans and offering tools to fully exploit the NRRP measures to business customers in specific sectors of interest. The experimental context was decisive in allowing the evaluation of potential partners for real commercial development initiatives, before proceeding with a wider implementation of the organisational and service model.

The *Your Advisor* laboratory has made significant progress in supporting businesses, with an increase in the number of companies that have benefited from the strategic and management advice offered. Training activities on NRRP measures continued to be a focal point, with new information and commercial campaigns and specialised marketing initiatives that made it possible to expand the customer base involved and achieve the related results.

These activities have freed the Group's creative and innovative potential, demonstrating the effectiveness of the experimental phase and the implementation of valuable processes.

In summary, the work carried out over the three-year period has strengthened the Group's commitment to innovation, consolidated the results obtained and initiated specific implementation projects to scale up the tested and performing models, also laying the foundations for future developments in the areas of Digital, Data, Communication and Sustainability.

Pitagora projects

In 2024, in line with the strategic guidelines of the Cassa di Risparmio di Asti Group, the Company continued its activities to improve the efficiency of its information systems and to bring its operations into line with the new regulations issued or entered into force during the year.

In the above-mentioned period, the following projects were completed internally:

- Technological renewal of the MyPitagora APP and the Customer Area

With a view to updating and improving the efficiency of company information systems, the technological renewal of the Area Riservata MyPitagora [MyPitagora Reserved Area], dedicated to customers, and the related mobile application was launched and concluded. The project has also achieved, among others, the objective of complying with the reference legislation on Accessibility (Italian Law 4 of 9 January 2024, Provisions to promote access for disabled people to IT tools, so-called "Stanca Law"), as



confirmed by the consulting company Cooperativa Sociale Quid “Progetto Yeah! Accessibilità e inclusione” [Project Yeah! Accessibility and inclusion], which re-performed the tests and found a significant improvement.

- Technological renewal of the institutional website www.pitagoraspa.it
Also with a view to updating information systems and in compliance with current legislation, during 2024 Pitagora also carried out a technological renewal project for the Institutional Website "www.pitagoraspa.it", with the aim of making it increasingly clear, accessible and transparent for the end customer. Also in this case, changes were made on the basis of findings emerged during the Accessibility Assessment, positively evaluated by the aforementioned consulting company.

In line with Supervisory provisions, the Internal Control System is comprised by a set of rules, processes, procedures, organisational structures and resources, which seek to ensure, while observing the principles of sound and prudent management, that the following objectives are reached:

The internal control system

- verifying the implementation of company strategies and policies;
- containing risk within the limits established by the Group;
- the effectiveness and efficiency of company processes;
- safeguarding the value of assets and protecting from losses;
- reliability and safety of company information and of IT procedures;
- preventing the risk that the Group is involved in illegal activities;
- the compliance of operations with the law, Supervisory regulations as well as policies, regulations and internal procedures;
- dissemination of a correct culture of risks, legality, ethics and respect for company values at all levels of the organisational structure of the individual Companies.

The primary responsibility for the completeness, adequacy, functionality and reliability of the Internal Control System rests with the governance bodies, and in particular the Board of Directors, which is responsible for strategic planning, management, assessment and monitoring of the overall Internal Control System, in this regard, supported by the Risk and Sustainability Committee. In this context, the Chief Executive Officer, by virtue of a specific mandate granted by the Board of Directors, oversees the functions of the Internal Control and Risk Management System. On the other hand, the Board of Statutory Auditors is responsible for monitoring the completeness, adequacy and functionality of the Internal Control System, ascertaining the adequacy of the company functions involved, the correct performance of the tasks and the adequate coordination thereof, as well as promoting any corrective measures. To complete the picture, the Supervisory Body pursuant to Italian Legislative Decree 231/2001 plays a role in the overall functioning of the Internal Control System within its area of competence as provided for by the Articles of Association or by law.



COMPANY OPERATIONS

The Internal Control System is an integral part of the Group's core business and all company structures are committed, with regard to their specific scope of responsibility and the tasks assigned to each of them, to conducting controls on the processes and operating activities they are responsible for. The system envisages three levels of controls:

- first-level controls, to ensure that the operations performed by the same operating structures or assigned to back-office structures are conducted correctly, and incorporated into IT procedures as far as possible;
- risk and compliance controls, entrusted to structures other than production, they ensure that the risk management process has been correctly implemented, check the consistency of the operations of individual areas with the risk objectives, verify compliance with the delegations awarded and verify the compliance of company operations with the law and regulations;
- internal audit, whose purpose is to identify irregularities, infringements of procedures and of regulations, as well as to assess the overall functioning of the Internal Control System. The activity, entrusted to independent non-production structures, is performed on a continuous basis, periodically or by exceptions, also through on-site audits.

First-level controls are performed directly by the operating structures, which are primarily responsible for the risk management process: during daily operations, these structures must manage the risks resulting from ordinary business activities; they must comply with the operating limits assigned to them consistent with the risk objectives and with the procedures that the risk management process breaks down into. Specific audits are also conducted in this regard, by specialist structures of the head office (mostly back office), with a view to improving the effectiveness of the control oversight mechanisms of company processes.

Second level risk and compliance controls are assigned primarily to the Risk Management and Compliance Functions respectively.

The Risk Management Function is tasked with continuously verifying the adequacy of the risk management process, the measurement and integrated control of the main types of risk and the consequent capital adequacy. The Function contributes to defining and implementing the *Risk Appetite Framework* (RAF) and the relative risk governance policies, verifies compliance with the limits assigned to the various operating functions and checks the consistency of the operations of the individual production areas with the risk objectives established. The Function is also responsible for measuring and assessing risk with a view to calculate the overall internal capital (Internal Capital Adequacy Assessment Process, ICAAP) envisaged by Prudential Supervision Regulations.

The Compliance Function ensures the oversight and the management of activities related to the risk of non-compliance with the law, meaning the risk of incurring judicial or administrative sanctions, relevant financial losses or reputational damage due to infringements of mandatory (legislative or regulatory) provisions, or those relating to self-regulation (articles of associations, codes of conduct, codes of self-



governance, regulations, policies). To this end, the Function identifies, assesses and manages the risk of legislative or regulatory infringements and ensures that the internal processes and procedures are consistent with the objective of preventing the infringement of external regulatory and self-regulatory provisions. With regard to investment services, the same Function is tasked with regularly checking and assessing the adequacy and the effectiveness of the oversight mechanisms adopted for the provision of these services.

The Company second level Control Functions also include the Anti-Money Laundering Function established in compliance with the implementing provisions of the Bank of Italy in terms of organisation, procedures and internal controls to prevent the use of intermediaries and of other parties that conduct financial activities for the purpose of money laundering or terrorist financing, pursuant to Italian Legislative Decree 231 of 21 November 2007.

Finally, the Company second level Control Functions also include Validation Function, which is tasked with continuously checking the compliance of the Internal Rating System (IRB) and the adequacy of the methods used by the Group to manage and measure risk.

The Internal Audit Function (third level) adopts a systematic approach, to verify the regularity of operations and the risk trend, as well as to periodically assess the completeness, the adequacy, the functioning and the reliability of the overall Internal Control System.

The Internal Audit Function is also tasked with periodic audits on the adequacy and the effectiveness of the second level Company Control Functions, on the effectiveness of the process to define the *Risk Appetite Framework* (RAF), on the internal consistency of the overall mechanism, and on the compliance of company operations with the RAF, on the adequacy of the *Internal Capital Adequacy Assessment Process* (ICAAP) and on the compliance of remuneration and incentive practices with the legislation in force and the policies adopted by the Group. Lastly, the areas of competence of the Function include the continuous assessment of the adequacy and functionality of the processes and IT systems overseeing the management of the Internal Rating System (IRB).

Furthermore, with a view to implementing and promoting a culture of legality, adopting appropriate measures to keep the company reputation intact with benefits in terms of reducing losses from potential damage, improving the working environment and promoting the corporate image, the Whistleblowing System is in place throughout the organisational structure. Any illegal conduct (meaning an action or an omission) that emerges in the performance of a working activity, which could be damaging or detrimental for the Bank or for its employees as directed towards infringing the legislative provisions governing banking activity, may be reported.

Within the Internal Control System, provision is made for communication flows, on a continuing basis, between the Company Control Functions and the Corporate Bodies, relating, in particular, to the results of control activities and the



COMPANY
OPERATIONS

identification of remedial actions. The sharing of useful information for planning and, more generally, the coordination of activities between the different Control Functions takes place (in addition to the Group and company coordinating bodies envisaged by internal regulations) at a specific “Inter-functional ICS Coordination Group” envisaged by the Group Regulation on the Internal Control System.

With regard to the Internal Control System, in its management and coordination capacity, the Parent Company exercises:

- strategic control over the development of the various business areas in which the Group operates and of the risks associated with the same;
- management control to ensure a balanced economic, financial and capital situation for individual Group companies and for the Group as a whole;
- technical-operational control to assess the various risk profiles of the individual Subsidiaries and of the overall risks of the Group.

Also in light of the indications that emerged during the inspection by the Bank of Italy that ended in October 2024, Banca di Asti, in continuation of what has already been done in recent years, has planned and in part already undertaken specific actions to strengthen the overall system of internal controls, with particular reference to second and third level control functions.

Main risk factors relating to the Group and the sector it operates in

The Group is exposed to the risks of the banking and financial sector, the main ones of which are credit, market, liquidity, operational and IT risk.

In line with that provided for in the Group’s policy documents, maintaining high standards in terms of monitoring, measuring and managing relevant company risks is considered strategic.

Just as in the past, in 2024, efforts continued to ensure the continuous development of the internal control system, with a view to pursuing the increasing integration and effectiveness of oversight mechanisms with regard to the different risk categories.

Credit risk

In line with the regional commercial nature of the Parent Company, the credit policies are oriented towards supporting the local economies, households, business owners, professionals and SMEs. The Group’s credit policy is therefore targeted at creating a stable relationship with the customer, managed from a long-term perspective, with a view to providing continuity over time to relations with counterparties, in order to understand their strategic decisions and their key economic and financial factors, prioritising credit risk protection over increasing asset volumes.

Credit therefore represents the most significant component of the Group’s business and credit risk is the most significant source of risk for its business.

Credit risk represents the potential loss resulting from changes in the customers’ income generating capacity and equity situation, that occur after the disbursement of the loans, such that the customer cannot promptly fulfil its contractual obligations. Indications of credit risk are not only insolvency, but also the deterioration of creditworthiness.



When granting loans, the Group's guidelines, retained fundamental for the correct management of its loans portfolio, are based on the fragmentation of the risk among a multitude of parties (private and business customers) operating in different sectors of economic activity and in different market segments and the consistency of each credit facility to the creditworthiness of the customer, and the type of transaction, taking into account collateral guarantees that may be acquired.

To mitigate credit risk, during the credit facility granting process, guarantees are required, the effectiveness of which is checked periodically.

Using specific structures, procedures and tools to manage and control credit risk, the Group constantly monitors the development of doubtful exposures - considered as a whole or as individual components - and the percentage they represent of the total cash loans disbursed and signature loans granted.

In recent years, the Bank has continuously carried out numerous interventions aimed at strengthening the system for monitoring, classifying and evaluating loans; in the continuation of this activity, also in consideration of the recommendations that emerged during the recent inspection by the Bank of Italy, the Bank has planned further actions to strengthen the credit risk management system, which will be finalised during the course of 2025.

Counterparty risk is the risk that the counterparty to a transaction relating to specific financial instruments defaults before the transaction is settled. This is a type of risk that generates a loss if the transactions set in place have a positive value at the time the counterparty becomes insolvent. The main source of counterparty risk is related to derivatives stipulated by the Group exclusively with institutional counterparties to hedge interest rate risk. In this regard, a form of mitigation of counterparty risk is represented by *Credit Support Annex* contracts, stipulated with counterparties, which entail setting up guarantees to cover the existing credit.

For further information on the credit risk of the Group and the relative management policies, please refer to the Notes to the consolidated financial statements, Part E.

The main components of market risk are interest rate risk and price risk on the owned banking book and the trading book and exchange rate risk. Market risks represent, therefore, a central component of the broader economic risk, or the risk linked to the possibility that the profit generated will differ from shareholder and management expectations. **Market risk**

The Group has adopted strategies, procedures and systems to manage and control market risk.

Trading activities (FVTPL portfolio) are used as a supplementary source of revenues in the overall management of the proprietary finance segment.

The Group's objective is to maintain a good balance between the balance sheet (and off-balance sheet) assets and liabilities of the banking book in terms of sensitivity to changes in the market interest rate curve.



COMPANY
OPERATIONS

The Group operations on the markets regarding financial instruments and foreign currencies are traditionally characterised by the utmost prudence and, therefore, the risk exposure generated by the same is usually limited.

Exchange rate risk represents the risk of incurring losses due to adverse changes in the prices of foreign currencies on all of the positions held by the Group, regardless of the portfolio they are allocated to. The Group is marginally exposed to exchange rate risk as a result of its limited trading activities in the currency markets and its investment and fundraising activities with instruments denominated in a currency other than the Euro.

Hedging of exchange rate risk tends towards minimising currency exposure by entering into agreements with credit counterparties intended to hedge the positions at risk.

For information on the market risk of the Group and the relative management policies, please refer to the Notes to the consolidated financial statements, Part E.

Liquidity risk Liquidity risk is the risk that the Group is not able to meet its obligations at the time of redemption and covers the possibility that the enterprise cannot maintain its payment commitments, due to the inability to raise new funds (funding liquidity risk) and/or the inability to liquidate assets on the market (market liquidity risk) due to the existence of limits to their disposal.

Liquidity risk also encompasses the risk of meeting payment commitments at higher than market costs, namely incurring a higher cost of funding and/or incurring capital losses in the case of asset disposals.

The proper management and adequate monitoring of company liquidity also involves processes, instruments and methodologies that embrace distinct areas represented by operating liquidity, structural liquidity and strategic liquidity.

The Group has adopted tools and procedures to ensure effective and active liquidity management and the systematic control of the liquidity position and of the management of the owned portfolio. The Group has also long adopted specific 'Group Liquidity Policies' (including the '*Contingency Funding and Recovery Plan*', forming an integral part thereof) with a view to establishing the principles and guidelines for the efficient and effective management of its liquidity, in order to comply with Supervisory and internal regulations and to comply with the regulatory limitations envisaged by Supervisory Regulations.

For information on Group liquidity risk and on the relative management and control tools, please refer to the Notes to the consolidated financial statements, Part E.

Operational risk Operational risk is the risk of suffering from losses deriving from inadequacies, malfunctioning or gaps in internal processes, in human resources, in systems or due to external events. This risk encompasses "legal risk" (risk resulting from infringements or from failure to comply with laws or regulations, or poor transparency as regards the legal rights and duties of the counterparties to a transaction) and "conduct risk" (risk of losses due to the inappropriate offer of financial services and the related legal costs, including cases of conduct that are intentionally inadequate or negligent).



The areas of operational risk include customers, products and operating practices, external fraud, the performance and management of processes, employment contracts and occupational safety, damages to or losses of material goods and internal fraud.

The entire organisational structure is exposed to operational risk and the functions responsible for processes and/or the company operating units are tasked with managing this risk.

The Internal Control System constitutes a fundamental element of the overall Group Company governance system. Its objective is to guarantee that company operations are inspired by principles of sound and prudent management and that they are aligned with approved strategies, the policies adopted and the risk appetite.

The awareness of the importance of an efficient Internal Control System in terms of safeguarding the value of the business and in safeguarding its reputation is conveyed within the Group by plans, decisions and action aimed at spreading a “risk culture” and at strengthening the control system.

Group companies have adopted tools and procedures to keep operational risk under control and, periodically, collect, analyse and statistically process the historic loss data recorded internally.

One tool used to mitigate operational risk is represented by the Business Continuity Plan, which envisages a series of initiatives to reduce the damages caused by accidents and disasters that directly or indirectly affect Group Companies to an acceptable level, and by the Disaster Recovery Plan, which establishes the technical and organisational measures needed to handle events which could lead to the unavailability of data processing centres.

Lastly, another tool used to mitigate operational risk is represented by the insurance cover set in place by Group Companies with leading insurance companies.

The Prevention and Protection Service, in compliance with provisions in force, monitors health and safety conditions in the workplace, implementing, if necessary, the appropriate improvement measures.

The *Data Governance* with which the Bank intends to pursue the protection of its information assets is part of the Risk Governance System framework.

In this context, *Data Quality* aims to maintain an adequate level of accuracy, completeness, timeliness of the data, through the supervision of the following characteristic processes: the design of control systems, the periodic operation of this system and the relative detection of anomalies, the contingency and structural removal of the anomalies detected, the monitoring of the quality of the data and the main related phenomena.

Closely related to operational risk, IT risk represents the risk of incurring economic losses, reputational damage and the loss of market share relating to the use of information and communications technology.



COMPANY OPERATIONS

IT risk The IT system (including technological resources - hardware, software, data, electronic documents - and human resources dedicated to their administration) represents a very important tool to achieve strategic and operating objectives, given the critical nature of the business processes that depend on it. In fact:

- from a strategic perspective, a safe and efficient IT system, based on a flexible, resilient architecture, integrated at group level, enables the opportunities offered by technology to be exploited to extend and improve products and services for customers, increase the quality of work processes, encourage a paperless approach, reduce costs also by creating virtual banking services;
- with a view to sound and prudent management, the IT system enables management to obtain detailed, relevant and updated information to make informed and rapid decisions and to properly implement the risk management process;
- with regard to limiting operational risk, the regular performance of internal processes and of the services provided to customers, the integrity, confidentiality and availability of the information processed, rely on the functioning of automated processes and controls;
- as regards compliance, the IT system is tasked with recording, storing and correctly representing operating events and events that are relevant for the purposes envisaged by the law and by internal and external regulations.

For further information on the operational and IT risks of the Group and on the relative management policies, please refer to the Notes to the consolidated financial statements, Part E.

Emerging risks Since 2015, with the ratification of the Paris Agreement on climate change, sustainability and the transition to a low-carbon economy have become fundamental elements in ensuring long-term competitiveness.

This awareness was translated, from a regulatory point of view, into various provisions issued by the EU, the Regulator (ECB and EBA Guidelines) and by the Italian Supervisory Authority (Supervisory Expectations on climate and environmental risks), which emphasise the centrality of climate and environmental risks.

In this constantly evolving context, Banca di Asti has worked to investigate these issues in view of the future adoption of new models, scoring techniques and external scenarios from recognised international providers (ECB Climate Stress Test, NGFS).

At the end of 2021, the ESG initiative was included as an enabling factor of the 2022–2024 Strategic Plan and consequently since 2022, the Bank has activated a specific project initiative in this area.

This project has achieved important objectives, including:

- obtaining the certifications on Gender Equality, on Occupational Health and Safety and on the Environment;
- adopting the Equality, Equity and Inclusion Policies,



- integrating ESG factors in the credit granting and monitoring processes;
- releasing products for individuals and businesses aimed at fostering a sustainable economy;
- adopting the new MIFID questionnaire with a section on customer sustainability preferences,
- drafting of the Sustainability Plan;
- renaming of the Risk Committee to the Risk and Sustainability Committee with the assignment of new tasks in the area of sustainability.

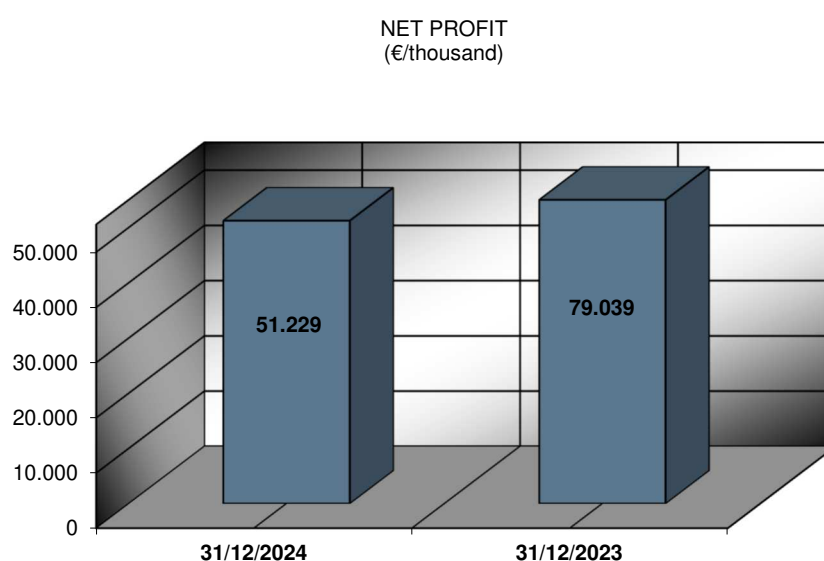
On 30/06/2023, in line with what is defined in the Sustainability Plan, the ESG and Sustainability Office was established. The aforementioned office is responsible for defining the Bank's ESG Strategy and coordinating and stimulating initiatives in the ESG and Sustainability area. As of 01/07/2023, the ESG and Sustainability Office is responsible for coordinating the ESG Project and related initiatives.

As part of ESG initiatives, taking into account the good practices recommended by the Bank of Italy following the studies carried out on a selected number of *Less Significant Banks*, in January 2023, Banca di Asti prepared a plan of alignment initiatives to be completed in the 2023-2025 two-year period, in compliance with the requirements of the competent Authority, while making provision for integration of the Sustainability Plan. Similarly, in March 2023, the subsidiaries Pitagora and We Finance have prepared and forwarded to the Bank of Italy a plan for alignment with expectations for 2023-2025. The progress of the Parent Company's plan is periodically reported to the Risk and Sustainability Committee and to the Board of Directors, while the subsidiaries provide, on a half-yearly basis, a report to their Boards of Directors.



ECONOMIC PERFORMANCE

Income trends In a complex market context, the Group ended the year 2024 on a positive note, achieving a net profit of approximately € 51.2 million, -35.19% compared to the figure for the year 2023, which had benefited from the result of the extraordinary operation regarding the transfer by contribution of the merchant acquiring business unit. Net of the effects of non-recurring extraordinary transactions on the economic results of 2024 and 2023, the net profit for 2024 amounted to € 51.1 million, + 15.82% compared to the 2023 figure. The operational ROE calculated net of revenues and extraordinary costs was 4.68%, up compared to 4.32% in 2023, also normalised.



All the key economic and financial indicators confirm the Group's structural soundness and robustness and solid operating performance, further demonstrating the effectiveness of the business model. The results of 2024 confirm the validity of the 2022-2024 Strategic Plan and the effectiveness of the related guidelines, as well as the ability to concretely implement them, resilience and adaptation to an economic context characterised by a difficult and uncertain macroeconomic situation, fuelled by the ongoing Russian-Ukrainian conflict and tensions on the Middle East front.

The diversification of sources of income, risk oversight, the strategy to manage non-performing loans, the focus on operating efficiency and project management, enabled the Group to achieve a positive economic result in 2024, and, at the same time, to strengthen further the Group's fundamental principles, therefore laying solid foundations for continuing to create value for its shareholders in the future as well, and, more generally speaking, to meet the needs and the expectations of all stakeholders, reciprocating the trust that they place in us every day.

The analyses of income trends, illustrated below, refer to the Income Statement, reclassified according to operating criteria, with a view to highlighting, through the valuation of interim results, the subsequent levels of formation of the economic result.

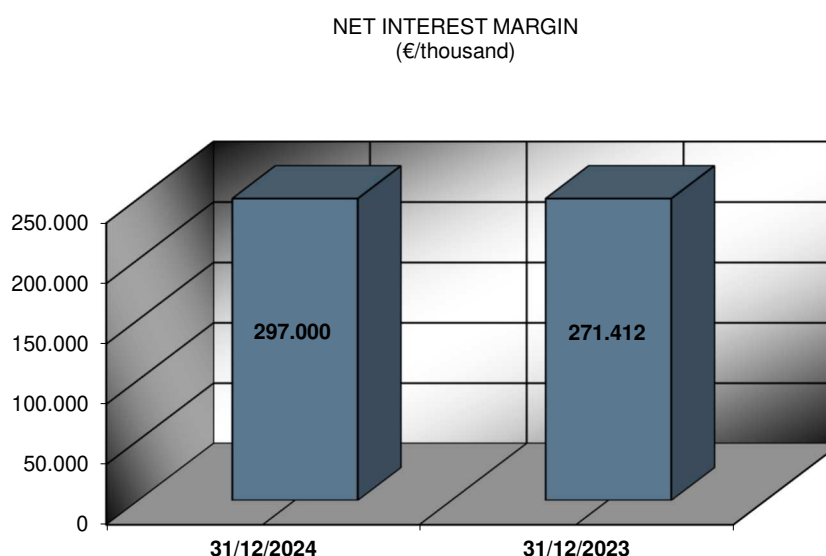


ECONOMIC
PERFORMANCE

For the reconciliation between the reclassified financial statements and the statutory accounts, please refer to the schedules shown in the “Annexes” section, while for more in-depth information, please refer to the schedules shown in the various sections of “Part C - Information on the Income Statement” in the Notes to the Consolidated financial statements.

Net interest margin amounted to € 297 million, up compared to the figure as at 31 December 2023 (€ +25.6 million, +9.43%), thanks above all to the trend in rates recorded during the course of the year. In fact, the increase in interest rates on loans and advances to customers and the increase in the rates of return on owned securities, conditioned by the trend in market rates, were only partially offset by the increase in the costs of direct funding and interbank funding.

**Operating interest
margin**



NET INTEREST MARGIN	2024 (€/thousand)	2023 (€/thousand)	% change
Interest income and similar revenues	524,356	503,764	4.09%
Interest expense and similar charges	-227,356	-232,352	-2.15%
Net interest margin	297,000	271,412	9.43%

The gross banking income amounted to approximately € 490.1 million, compared to a 2023 figure of € 485 million (+0.98%), and includes:

**Gross banking
income**

- net fees and commissions achieved by the Parent Company for € 131.1 million (-2.15% compared to 2023);
- the net result from financial assets and liabilities amounted to € 103.9 million (+58.20%), which includes both the profit (loss) from transactions in financial



ECONOMIC PERFORMANCE

instruments (amounting to € 10.4 million), and the measurement of financial liabilities designated at fair value, as well as gains from the assignment of loans to third parties by the subsidiary Pitagora which, net of prepayment provisions, amounted to € 93.5 million.

GROSS BANKING INCOME	2024 (€/thousand)	2023 (€/thousand)	% change
Net interest margin	297,000	271,412	9.43%
Net fees and commissions	70,785	96,102	-26.34%
- <i>management, brokerage and consulting</i>	71,321	68,184	4.60%
- <i>collection and payment services</i>	15,663	21,114	-25.82%
- <i>loans and guarantees</i>	1,631	1,730	-5.72%
- <i>management of current accounts and deposits</i>	31,230	29,332	6.47%
- <i>other services</i>	-49,060	-24,258	102.24%
Dividends and similar income	10,387	10,335	0.50%
Other operating income (expenses)	8,028	41,825	-80.81%
Results of other financial assets and liabilities	103,894	65,671	58.20%
Gross banking income	490,094	485,345	0.98%

Net fees and commission income amounted to € 70.8 million, down by 26.34% compared to 2023. Limiting the scope of analysis to the Bank, net fees and commission income (amounting to € 131 million) decreased by 2.15% compared to the year 2023. In particular, fees and commissions received for the management of current accounts and deposits amounted to € 31.2 million (6.47%) compared to the previous year, while net fees and commissions relating to the financial and insurance management, brokerage and consulting services, consisting essentially of fees and commissions received for the management and administration of indirect funding as well as those relating to the distribution of insurance policies, amounted to € 71.3 million, also up (+4.60%) compared to last year.

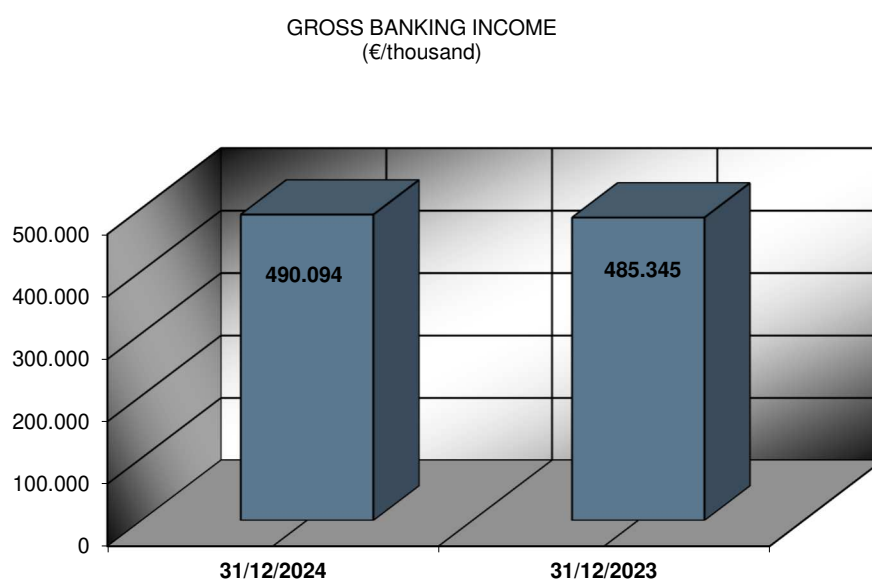
Fees and commissions relating to other services are negative (amounting to € -49,1 million) and mainly comprising, for the Group, fees and commissions related to credit transactions and referring to the subsidiary Pitagora.

Dividends on equity investments received by the Group amounted to € 10.4 million (substantially unchanged value compared to 2023) and mainly refer to the equity investment held in the Bank of Italy.

Other operating expenses and income amounted to € 8 million, down compared to the previous financial year mainly due to the effect on the aggregate of 2023 of the contribution of the merchant acquiring business unit. In 2023, the item had in fact included the capital gain from the contribution of € 37 million, while in 2024 the same item included the variable consideration as an earn-out of € 5 million, again relating to the same extraordinary transaction but consequent to the achievement of a migration rate of 90% of the renegotiations of merchant acquiring relationships. Net of the effects related to the extraordinary transaction, other income and charges amounted to € 3 million, down by approximately € 1.8 million compared to 2023.



Finally, the overall net result of financial assets and liabilities, which includes both the result of operations with trading and hedging financial instruments, realised or from valuation, and the valuation of financial assets and liabilities recognised at amortised cost and at fair value, amounted to approximately € 103.9 million, an increase (+58.20%) compared to the result recorded in the previous year (€ 65.7 million).



Net banking income, net of losses on disposal of financial assets measured at amortised cost, consisting mainly of losses from the transfer of NPL loans, adjustments to financial assets measured at amortised cost and losses from contractual changes without derecognition, amounted to € 371.2 million, down € 5.7 million (-1.51%) compared to the previous year.

Net banking income

Losses resulting from the disposal of financial assets measured at amortised cost totalled € 22.2 million, against € 41.9 million in 2023, and related almost entirely to derisking operations conducted during the year in line with the Group NPL Strategy.

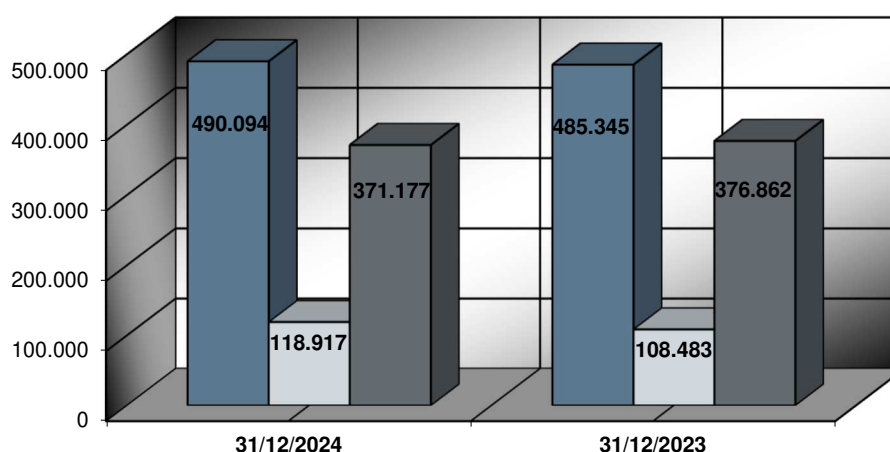
Net adjustments to loans and advances to customers made during the year amounted to € 96.7 million (€ 66.4 million as at 31 December 2023) and resulted in a consequent cost of credit, excluding losses on disposal, equal to 1.27% of gross loans and advances to customers (0.87% in December 2023). The aggregate consisting of losses on disposal and net adjustments to loans and advances to customers amounted to € 119 million in 2024 (€ +11 million compared to 2023, +10.13%).



ECONOMIC PERFORMANCE

NET BANKING INCOME	2024 (€/thousand)	2023 (€/thousand)	% change
Gross banking income	490,094	485,345	0.98%
Gains (Losses) on disposal of financial assets measured at amortised cost	-22,194	-41,896	-47.03%
Net adjustments for credit risk to financial assets measured at amortised cost	-96,938	-66,278	46.26%
- of which: net adjustments to loans and advances to customers	-96,656	-66,419	45.52%
Profits/losses from contractual changes without derecognition	215	-309	-169.58%
Net banking income	371,177	376,862	-1.51%

■ gross banking income
 ■ net adjustments to and losses on disposal of financial assets measured at amortised cost
 ■ net banking income



Profit before tax from continuing operations

The profit before tax from continuing operations for 2024 amounted to € 78 million, down 21.86% compared to the previous year.

Operating costs amounted to € 277.3 million (+1.38% compared to December 2023).

Personnel expenses, which account for about 53.06% of total operating costs, amounted to € 147.1 million, up by 4.73% compared to the corresponding figure for last year. This growth is largely attributable to wage increase deriving from the renewal of the national collective labour agreement for bank employees and to the increase in the number of resources.

The remaining cost items, which include other administrative expenses and net adjustments to property, plant and equipment and intangible assets, amounted to € 130.1 million and decreased by 2.17% compared to 31 December 2023, despite the impact of inflation and the new projects launched in accordance with the Group's strategic guidelines aimed at increasing efficiency while investing in business development, human capital, the modernisation and digitalisation of customer



services and work processes, through a number of project initiatives aimed at pursuing medium- and long-term targets in compliance with the company's values.

Other administrative expenses for € 104.7 million, are down by 3.69% compared to 2023, mainly due to the absence of the contribution requested by the Single Resolution Fund for the year 2024 as a result of the early achievement of the target at system level. Overall, the contributions to the National Resolution Fund and the Interbank Deposit Protection Fund (FITD) for the year 2024 amounted to € 8.5 million, while as at 31 December 2023 the aforementioned contributions amounted to approximately € 14.4 million (€ -6 million).

The depreciation of property, plant and equipment, and amortisation of intangible assets was € 25.5 million, up against last year (+4.63%).

In 2024, research and development costs were not included under intangible assets and in the same year, no tax credit was recognised or generated with regard to research and development costs.

Net allocations to provisions for risks and charges attributable to the subsidiary Pitagora refer to the following cases:

- potential future expenses relating to collection costs charged by INPS, amounting to € 1.8 million;
- potential future charges related to possible customer complaints amounting € 1.1 million, for the compensation of commissions and expenses due as a result of the early repayment of the receivable;
- potential future expenses referring to reimbursements of price spreads between the discount rate and the rate applied to customers due to loan transferee companies following early termination for € 6.2 million.

With reference to the Parent Company, the item “provisions for liabilities” consists for the most part of prudential provisions estimated against potential commission reimbursements to customers in relation to issues arising during the audit of the Bank of Italy completed in the month of October 2024. These provisions, equal to € 6.6 million, mainly refer to the application interpretation of contractual clauses duly stipulated and relating to multi-year time horizons. Following receipt of the audit conclusion report in January 2025, activities are being carried out to make the repayments. The other allocations to provisions for liabilities refer to sundry disputes and claw-backs, as well as to net adjustments to commitments and guarantees given for € 3.3 million.

The Group's Cost/Income, the main indicator of business efficiency, stands at 56.57% (56.35% as at 31 December 2023); its operating value, net of extraordinary revenues related to the transaction of the merchant acquiring transfer by contribution, is equal to 57.15%, down 3.48% compared to 2023, confirming the high degree of efficiency and productivity of the Group, also in consideration of expenses linked to the development strategies designed to achieve medium/long-term targets.



ECONOMIC PERFORMANCE

PROFIT BEFORE TAX FROM CONTINUING OPERATIONS	2024 (€/thousand)	2023 (€/thousand)	% change
Net banking income	371,177	376,862	-1.51%
Operating costs	-277,248	-273,483	1.38%
- personnel expenses	-147,117	-140,468	4.73%
- personnel expenses	-147,065	-140,418	4.73%
- other administrative expenses	-104,674	-108,685	-3.69%
- other administrative expenses	-96,212	-94,290	2.04%
- contribution to SRF and DGS	-8,462	-14,395	-41.22%
- net adjustments to property, plant and equipment and intangible assets	-25,457	-24,330	4.63%
Net allocations to provisions for risks and charges	-15,614	-3,556	n.s.
Gains (losses) on disposal of investments	-270	57	n.s.
Profit (loss) from continuing operations	78,045	99,880	-21.86%

OTHER ADMINISTRATIVE EXPENSES	2024 (€/thousand)	2023 (€/thousand)	% change
IT expenses	-35,229	-36,424	-3.28%
Property expenses	-14,673	-13,760	6.63%
General expenses	-22,119	-26,154	-15.43%
of which: - contribution to National Resolution Fund and FITD	-8,462	-14,395	-41.22%
Professional and insurance expenses	-22,383	-21,551	3.86%
Utilities	-3,860	-3,855	0.13%
Promotional, advertising and marketing expenses	-3,953	-4,309	-8.26%
Indirect taxes and duties	-2,457	-2,632	-6.64%
Other administrative expenses	-104,674	-108,685	-3.69%

These types of expenses are shown net of the relative recoveries

Taxes and net profit Net profit of the Group amounted to € 51.2 million, a decrease of € 27.8 million compared to the same result in 2023 (-35.19%), and is composed of € 47.7 million in profits pertaining to the Parent Company and € 3.5 thousand in profit pertaining to minority interests.

Net of the effects of extraordinary transactions and non-recurring items, such as the transaction by contribution of the merchant acquiring business unit and extraordinary allocations to provisions for future risks related to the inspection, the net profit for 2024 amounts to € 51.1 million, +15.82% compared to the figure for 2023, also normalised. The operational ROE calculated net of revenues and extraordinary costs was 4.68%, up compared to 4.32% in 2023.

The results as at 31 December 2024 are fully in line with the budget objectives. Taking into account the complex and difficult context, the results therefore prove the validity of the Group's underlying strategic choices, intended to preserve and improve upon the Group's solid fundamentals without renouncing, thanks to constant attention to both operating efficiency and diversification and increase in sources of revenue, to the



satisfactory creation of value for shareholders which, along with other stakeholders, place their trust in the Group.

It should be noted that Article 1, paragraphs 14-17 of Italian Law 207/2024 (2025 Budget Law) has regulated the issue of write-downs and losses on receivables (Transitional deductibility regime for financial intermediaries and insurance companies pursuant to Article 16, paragraphs 3-4 and 8-9 of Italian Decree Law 83/2015) further diluting until the 2029 financial year (the previous deadline was 2026) the tax recovery in predefined portions of write-downs prior to 2015.

This regulatory change has no effect on the results of the probability test as the dilution is limited to qualified DTAs that can be converted into tax credit pursuant to Italian Decree Law 225/2010.

The probability test provides for the full recovery of the residual deferred tax assets, related to years reporting tax losses, of the excess ACE by the end of the 2026 financial year, and the taxes recognised in 2018 for the write-down of receivables on FTA of IFRS 9, on a straight-line basis until 2029, in accordance with the laws currently in force.

NET PROFIT	2024 (€/thousand)	2023 (€/thousand)	% change
Profit (loss) from continuing operations	78,045	99,880	-21.86%
Tax expense (recovery) on income from continuing operations	-26,816	-20,841	28.67%
Net profit	51,229	79,039	-35.19%
Profit net of extraordinary items	51,145	44,158	15.82%



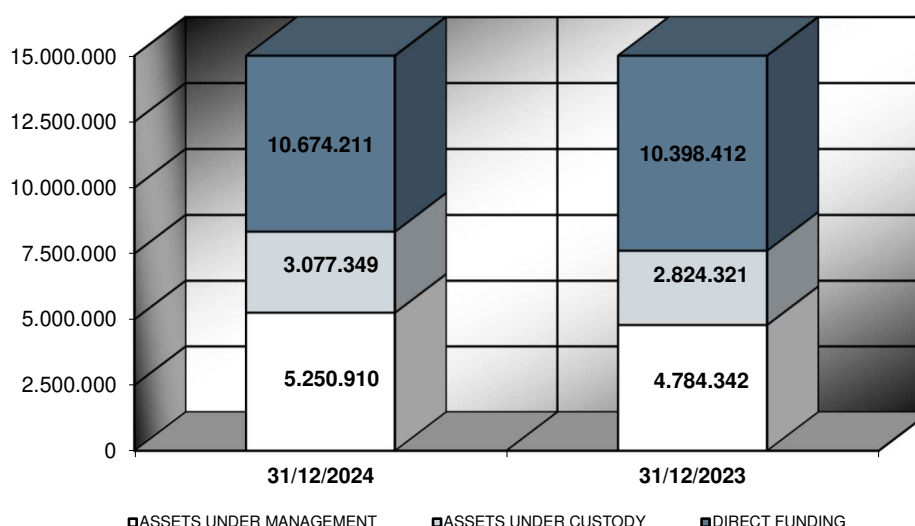
**FUNDING AND
CREDIT
MANAGEMENT**

**Assets managed
on behalf of
customers**

As at 31 December 2024, brokered financial assets amounted to € 19 billion, up 5.53% compared to the previous year. New funding production since the beginning of the year amounted to € 299 million, of which € 160 million related to assets under custody and € 139 million to assets under management.

The managed assets from non-institutional customers totalled € 17.4 billion, up 5.36% since the beginning of the year.

Within this aggregate as a whole, direct funding continues to be the most important component, representing around 56,17% of the total.



TOTAL FINANCIAL ASSETS	2024		2023 ^(*)		Change %
	Amount (€/thousand)	%	Amount (€/thousand)	%	
Direct funding	10,674,211	56.17%	10,398,412	57.75%	2.65%
of which: from customers	9,081,943	47.79%	8,915,419	49.51%	1.87%
of which: market securitisations and institutional funding	1,592,268	8.38%	1,482,993	8.24%	7.37%
Assets under management	5,250,910	27.63%	4,784,342	26.57%	9.75%
Assets under custody	3,077,349	16.19%	2,824,321	15.68%	8.96%
Total financial assets	19,002,470	100.00%	18,007,075	100.00%	5.53%
of which: from customers	17,410,202	91.62%	16,524,082	91.76%	5.36%

^(*) Adjusted valuation criteria for consistency with financial year 2024

Note that the method adopted to measure financial assets in the tables is as follows:

- Direct funding: book value
- Assets under management and under custody: market value as at 31/12/2024



As at the end of 2024, the Group's direct funding amounted to € 10.7 billion e was up (+2.65%) compared to 2023. The component relating to ordinary customers amounted to € 9.1 billion, up compared to the previous year (+1.87%).

Direct funding

The volume of bonds increased by € 44.2 million (+1.92%) following the placement on the market of securities resulting from the securitisation of loans, the volume of current accounts increased by € 25.7 million (+0.39%) and savings deposits decreased by € 13.8 million (-20.89%). In addition, € 49.7 million repurchase agreements were placed with customers. Savings investors were mainly interested in time deposits, which increased by approximately € 307.4 million.

DIRECT FUNDING FROM CUSTOMERS	2024 (€/thousand)	2023 (€/thousand)	Change	
			Absolute	%
Bonds	2,340,591	2,296,416	44,175	1.92%
<i>of which: originating from securitisation</i>	1,310,200	1,107,386	202,814	18.31%
<i>of which: measured at fair value</i>	12,495	12,768	-273	-2.14%
Current accounts	6,604,381	6,578,633	25,748	0.39%
Time deposit	1,335,449	1,028,041	307,408	29.90%
Repurchase agreements	49,694	42,632	7,062	16.57%
Savings deposits	52,186	65,967	-13,781	-20.89%
Banker's drafts	22,228	22,533	-305	-1.35%
Lease liabilities	36,468	38,418	-1,950	-5.08%
Other funding	233,214	325,772	-92,558	-28.41%
Total direct funding	10,674,211	10,398,412	275,800	2.65%

Assets under management amounted to € 5.3 billion and recorded a significant increase compared to the end of 2023 (+9.75%).

Assets under management and under custody

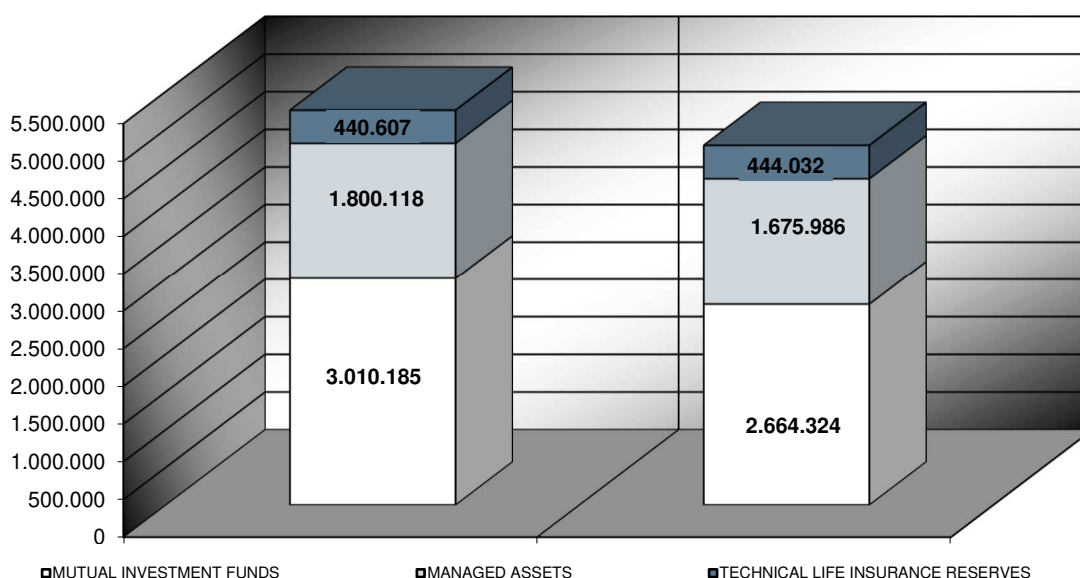
Assets under custody amounted to € 3.1 billion, also recording an increase of 8.96% as at 31 December 2023.

The change in indirect funding under management calculated on production volumes, immunising the effects of the market, was +2.95%. Similarly, the change in indirect funding under custody, calculated on production volumes net of market impacts, was +5.80%.

Therefore, indirect funding amounted to € 8.3 billion, recording a considerable increase of +9.46% compared to 2023, with € 299 million in new production. The change in production volumes, net of market impacts, was +3.93%.



**FUNDING AND
CREDIT
MANAGEMENT**



FINANCIAL ASSETS OF CUSTOMERS	2024		2023 (*)		Change
	Amount (€/thousand)	%	Amount (€/thousand)	%	%
Mutual investment funds	3,010,185	57.33%	2,664,324	55.69%	12.98%
Managed assets - securities and funds	1,800,118	34.28%	1,675,986	35.03%	7.41%
Technical life insurance reserves	440,607	8.39%	444,032	9.28%	-0.77%
Assets under management	5,250,910	100.00%	4,784,342	100.00%	9.75%

(*) Adjusted valuation criteria for consistency with financial year 2024

Loans and advances to customers

As at 31 December 2024, loans and advances to customers, which amounted to € 7.4 billion, recorded a slight decrease (-0.93%) compared to the previous year (against an average in the banking sector equal to -1.94%, as per the ABI source¹).

Net of derisking, the trend of the aggregate confirms that, despite the unfavourable economic scenario, the Group continues to commit to ensuring financial support to private banking customers and to economic operators, with the firm conviction that a robust recovery can only be achieved through the driving force of the real economy.

¹ Source: ABI Monthly Outlook 01/2025



BREAKDOWN OF LOANS AND ADVANCES TO CUSTOMERS	2024 (€/thousand)	2023 (€/thousand)	Changes	
			Absolute	%
Current accounts	375,421	362,354	13,067	3.61%
Mortgages	4,651,485	4,745,415	-93,930	-1.98%
Credit cards, personal loans, and salary/pension-backed loans	1,504,329	1,467,467	36,862	2.51%
Other transactions	806,096	831,784	-25,688	-3.09%
Debt securities	17,547	16,954	593	3.50%
Total loans and advances to customers	7,354,878	7,423,974	-69,096	-0.93%

With regard to corporate loans, the Group continues to pursue a policy that seeks to improve the relationship with SMEs by operating on the market with a view to expanding the content of its product range, in particular by focusing on specific and innovative products to meet the differing financial and non-financial business needs.

In addition, the Group continues to carefully oversee “risk fragmentation” regarding both the distribution by economic activity and concentration by single customer, which stood at fairly contained levels.

STATISTICAL TABLE REGARDING THE CONCENTRATION OF THE LOANS PORTFOLIO*	2024	2023
Top 10 groups	3.39%	2.94%
Top 20 groups	5.45%	4.86%
Top 30 groups	7.08%	6.40%
Top 50 groups	9.76%	8.96%
Top 100 groups	14.54%	13.44%

* including the salary/pension-backed loans of the subsidiary Pitagora S.p.A.

The percentages shown represent the credit granted as at 31/12/2024, compared with the same figures as at 31/12/2023.

Credit quality is still feeling the effects of the unfavourable phase of the economic cycle recorded in recent years, aggravated by the onset of the Russian-Ukrainian conflict and the tensions on the Middle East front.

Credit quality

During 2024, the Parent Company carried out significant loan disposal transactions involving impaired loan positions classified as bad loans for a total gross carrying amount of € 111 million and loan positions classified as UTP (Unlikely to Pay) for a carrying amount of approximately € 5 million.

In this context, at the end of the year the Parent Company, together with a group of other institutions, finalised a non-recourse transfer transaction for consideration and en bloc to the special purpose vehicle company specifically set up "Luzzatti POP NPLs 2024 S.r.l." of a portfolio of bad loans, pursuant to Italian Law no. 130 of 30 April 1999 and subsequent amendments and additions. The transaction was



FUNDING AND CREDIT MANAGEMENT

structured without the GACS guarantee; however, the opportunity to request this guarantee at a later stage is not excluded.

At the end of the 2024 financial year there was an increase in the amount of non-performing loans net of value adjustments, which rise from € 175 million in 2023 to € 215 million as at 31 December 2024 (+22.90%), with the gross and net NPL Ratio indicators increasing to 5.22% (from 4.36% in 2023) and 2.92% (from 2.36% in 2023) respectively.

The average level of coverage of non-performing loans stood at 45.63%. The level of operational hedge calculated net of write-offs amounted to 47.78%.

More specifically, bad loans net of value adjustments came to € 33 million, marking a drop of € 8.7 million (-20.90%) from the start of the year; the ratio to total loans is 0.45% and the coverage level is 66.32%. The level of operational hedge calculated net of write-offs amounted to 71.12%.

Unlikely to pay loans amounted to € 152 million, up by € 53.2 million (+53.93%) since the beginning of the year; the ratio to total loans was 2.06% and the coverage level was 41.72%.

Past due loans amounted to € 30.3 million, marking a decrease of € 4.4 million (-12.69%) since the beginning of the year; the ratio to total net loans is 0.42% and the coverage level is 18.51%.

In the context of the evaluation of non-performing loans, in accordance with the provisions of the reference regulations, the definition of write-downs (and consequently of the corresponding probable sales) takes into consideration various alternative scenarios identified for the management of the loans themselves. In particular, on the basis of what is reported in the ITG “Inclusion of cash flows expected from the sale on default of loan” of the IFRS Foundation staff and in the EBA Guidelines on “management of non-performing and forborne exposures” (EBA/GL/2018/06) for the proactive management of NPLs, forward-looking factors that include possible sales scenarios are taken into account, with effects in terms of valuation also for non-performing loans, if they represent a possible method of realising cash of flows.

The model for determining expected losses requires constant updating of the metrics used, both in relation to the internal management scenario and with reference to the sales scenarios and, therefore, reflects dynamic management of the portfolio of non-performing loans.

In fact, this dynamic management of the portfolio of non-performing loans entails, on the basis of the variability of the NPE market environment and the internal assessments carried out by the Bank's management, the inclusion of new positions in the scope of transfer or the exclusion of others initially identified for the sale; these cases are to be considered as completely natural in such a highly dynamic context, with the relevant accounting consequences relating to the write-downs and write-backs. It follows that the ideal scope originally identified needs to be constantly updated and improved, in terms of quality, quantity and write-downs, in order to always keep it aligned with the NPE Strategy objectives.



For more detailed information, please refer to the section “Methods for determining impairment losses” in the Accounting policies.

The presumed net losses associated with this “multi-scenario impact” as at 31 December 2024 amounted to approximately € 23.6 million, an amount equivalent to an implicit average pricing gap of 31.5%, which is consistent with what has been observed in the context of the disposal transactions carried out in recent years, and in particular in the 2024 financial year, with the provisions of the NPL Strategy and with the expectations for 2025 relating to the market for the disposal of non-performing loans.

The *Texas Ratio*, calculated as the ratio of gross non-performing loans to tangible common equity plus provisions, was 31,65% and confirms a good capacity to absorb any unexpected losses on loans.

Net of value adjustments, the breakdown of loans and advances to customers including those designated at FV and FVOCI attributable to Pitagora S.p.A. and We Finance S.p.A. was as follows:

	2024	2023	Changes	
	Amount (€/thousand)	Amount (€/thousand)	Absolute	%
Bad loans	32,981	41,693	-8,712	-20.90%
Unlikely to pay	151,772	98,595	53,177	53.93%
Past due loans	30,273	34,671	-4,398	-12.69%
Total non-performing loans	215,026	174,959	40,067	22.90%
Performing loans	7,139,852	7,249,015	-109,163	-1.51%
Loans and advances to customers	7,354,878	7,423,974	-69,096	-0.93%

	2024					
	Gross amount (€/thousand)		Value adjustments (€/thousand)	Net amount (€/thousand)		% coverage
Bad loans (*)	1.29%	97,927	64,946	0.45%	32,981	66.32%
Unlikely to pay	3.43%	260,423	108,651	2.06%	151,772	41.72%
Past due loans	0.49%	37,148	6,875	0.42%	30,273	18.51%
Total non-performing loans	5.22%	395,498	180,472	2.92%	215,026	45.63%
Performing loans	94.78%	7,187,665	47,813	97.08%	7,139,852	0.67%
Loans and advances to customers	100.00%	7,583,163	228,285	100.00%	7,354,878	3.01%



FUNDING AND
CREDIT
MANAGEMENT

	2023					
	Gross amount (€/thousand)		Value adjustments (€/thousand)	Net amount (€/thousand)		% coverage
Bad loans (*)	1.57%	120,144	78,451	0.56%	41,693	65.30%
Unlikely to pay	2.22%	169,271	70,676	1.33%	98,595	41.75%
Past due loans	0.57%	43,674	9,003	0.47%	34,671	20.61%
Total non-performing loans	4.36%	333,089	158,130	2.36%	174,959	47.47%
Performing loans	95.64%	7,303,755	54,740	97.64%	7,249,015	0.75%
Loans and advances to customers	100.00%	7,636,844	212,870	100.00%	7,423,975	2.79%

* Bad loans are shown net of interest on arrears deemed wholly unrecoverable.

With reference only to loans and advances to customers classified as HTC, the breakdown is as follows:

	2024				2023			
	Gross amount (€/thousand)	Value adjustments (€/thousand)	Net amount (€/thousand)	% coverage	Gross amount (€/thousand)	Value adjustments (€/thousand)	Net amount (€/thousand)	% coverage
Bad loans (*)	95,294	64,016	31,278	67.18%	116,827	77,207	39,620	66.09%
Unlikely to pay	258,020	108,363	149,657	42.00%	166,770	70,414	96,355	42.22%
Past due loans	35,787	6,592	29,196	18.42%	42,242	8,725	33,518	20.65%
Total non-performing loans	389,101	178,971	210,130	46.00%	325,839	156,346	169,493	47.98%
Performing loans	7,067,225	47,273	7,019,952	0.67%	7,228,130	54,307	7,173,823	0.75%
Loans and advances to customers	7,456,326	226,243	7,230,082	3.03%	7,553,969	210,653	7,343,316	2.79%

* Bad loans are shown net of interest on arrears deemed wholly unrecoverable.



As part of liquidity management, treasury activities remain focused on balancing inflows and outflows in the short and very short term (by changing monetary reserves or activating treasury financial transactions) aimed at ensuring the accurate balance of cash at every moment.

The Group closely monitors liquidity risk and carefully oversees the management of positions open to interest rate risk.

As at 31 December 2024, there was a further strengthening of the liquidity situation: the *Liquidity Coverage Ratio* (LCR) was 274.07%, and the *Net Stable Funding Ratio* (NSFR) was 175.39%, both up compared to 2023 (240.36% and 169.20%, respectively) and well above the regulatory requirements.

As at 31 December 2024, financial assets other than loans and advances to customers amounted to a total of € 3.3 billion, up on the previous year (+6.77%). The largest component of the owned securities portfolio, equal to roughly € 2.2 billion, is allocated to stable investments. Therefore, as it is measured at amortised cost, it does not substantially entail elements of volatility in the income statement and balance sheet.

The portion of financial assets measured at fair value through other comprehensive income that does not refer to equity investments - which amounted to approximately € 226.5 million - is mainly composed of government bonds from the EU area, primarily Italian.

The management of the securities portfolio has changed over time, adjusting in each case to the increased lending requirements, the market conditions and the stability of liquidity.

The securities portfolio is financed for € 633 million through repurchase agreements with a maturity of more than one year and underlying securities deriving from its own securitisation transactions with leading market counterparties. Financial instruments eligible as collateral for market financing transactions amounted to € 3.8 billion as at 31 December 2024, net of ECB haircuts (i.e. net of the reductions applied by the European Central Bank to the value of financial assets in the event of collateralisation of any refinancing transactions), of which € 809 million was committed. As a result, the eligible amount of financial instruments available comes to about € 3 billion.

**Company liquidity
and
the securities
portfolio**

OPERATIONS
ON THE FINANCIAL
MARKETS AND THE
COMPOSITION
OF THE GROUP



	2024 €/thousand	2023 €/thousand	Changes	
			Absolute	%
NET INTERBANK POSITION	-562,054	-572,902	10,848	-1.89%
Loans and advances to banks	148,876	192,294	-43,418	-22.58%
Deposits from banks	710,930	765,196	-54,266	-7.09%
FINANCIAL ASSETS	3,348,458	3,136,026	212,432	6.77%
Financial assets measured at fair value through profit or loss	47,920	66,075	-18,156	-27.48%
<i>of which fair value of derivatives</i>	<i>87</i>	<i>963</i>	<i>-876</i>	<i>-90.97%</i>
Financial assets measured at fair value through other comprehensive income	1,149,822	1,029,386	120,436	11.70%
Other financial assets measured at amortised cost	2,150,716	2,040,564	110,152	5.40%
FINANCIAL LIABILITIES HELD FOR TRADING	1,936	1,974	-38	-1.93%
<i>of which fair value of derivatives</i>	<i>1,936</i>	<i>1,974</i>	<i>-38</i>	<i>-1.93%</i>
DERIVATIVES (NOTIONAL AMOUNTS)	2,690,480	2,457,286	233,194	9.49%

As regards derivatives, the segment is mainly represented by transactions correlated with the pursuit of the company strategy of interest rate risk hedging and activities connected with securitisations of loans.

Composition of the Group The composition of the “Cassa di Risparmio di Asti” Banking Group as at 31 December 2024 is as follows:

- Parent Company: Cassa di Risparmio di Asti S.p.A.
- Subsidiaries and associates:
 - Pitagora Contro Cessione del Quinto S.p.A.
 - Immobiliare Maristella S.r.l.
 - We Finance S.p.A.



**OPERATIONS
ON THE
FINANCIAL MARKETS
AND THE COMPOSITION
OF THE GROUP**

Below is a summary of the main consolidated Group companies, with an indication of the most significant balance sheet, income statement and other operating data as at 31 December 2024.

**Performance
of the main
Group
companies**

Amounts are shown in €/thousand

MAIN BALANCE SHEET DATA	BANCA DI ASTI S.P.A.	PITAGORA S.P.A.	IMMOBILIARE MARISTELLA S.R.L.	WE FINANCE S.R.L.
NET LOANS AND ADVANCES TO CUSTOMERS	7,066,368	533,013	0	1,485
DIRECT FUNDING	10,444,648	234,423	0	311
INDIRECT FUNDING	8,328,259	0	0	0
TOTAL BALANCE SHEET ASSETS	12,667,294	586,131	13,499	7,730
TOTAL OWN FUNDS	1,011,460	75,769	0	2,617

MAIN INCOME STATEMENT DATA	BANCA DI ASTI S.P.A.	PITAGORA S.P.A.	IMMOBILIARE MARISTELLA S.R.L.	WE FINANCE S.R.L.
NET BANKING INCOME	322,998	48,176	292	4,437
OPERATING COSTS	-242,628	-29,610	-624	-3,408
NET PROFIT	50,161	9,512	-405	29

OTHER DATA AND INFORMATION	BANCA DI ASTI S.P.A.	PITAGORA S.P.A.	IMMOBILIARE MARISTELLA S.R.L.	WE FINANCE S.R.L.
EMPLOYEES	1,647	233	0	8
BRANCHES	209	84	0	0



SHARE CAPITAL
ACCOUNTS

Shareholders' equity Shareholders' equity, including profit for the year, came to € 1.1 billion.

The evolution of shareholders' equity during the year was as follows:

Evolution of Group shareholders' equity	Amount (€/thousand)
Group shareholders' equity as at 1 January 2024	1,091,667
Increases	64,323
- Net profit for the year	47,702
- Net change in purchases and sales of treasury shares	10,106
- Net change in valuation reserves	6,515
Decreases	-36,886
- Dividends	-14,812
- Net change in available reserves	-18,839
- Change in provisions for the share premium reserve	-3,235
Group shareholders' equity as at 31 December 2024	1,119,104
Minority shareholders' equity as at 31 December 2024	30,487

The Group's shareholders' equity increased by € 27.4 million compared to the end of the previous year, mainly due to the Group's profit of € 47.7 million realised in the financial year 2024.

The change in valuation reserves, positive by € 6.5 million after tax, is mainly attributable to the increase in value of financial assets measured at fair value with an impact on comprehensive income and to the increase in value of derivatives used to hedge cash flows (cash flow hedges). The decreases were determined by the distribution of dividends to shareholders of the 2023 profit and the payment of coupons on the Bank's AT1 securities.



SHARE CAPITAL ACCOUNTS

The Parent Company's share capital breaks down as follows:

Share capital of the Parent Company

Shareholder	% of share capital
Fondazione Cassa di Risparmio di Asti	31.80%
Fondazione Cassa Di Risparmio di Biella	12.91%
Banco BPM Società per Azioni	9.99%
Fondazione CRT	6.00%
Fondazione Cassa di Risparmio di Vercelli	4.20%
Other shareholders	34.60%
Treasury shares	0.50%
Total	100%

As at 31 December 2024, the share capital of the Bank amounted to € 364 million, broken down into 70,537,048 ordinary shares with a nominal value of € 5.16.

The treasury shares held by the Group as at 31 December 2024 stood at 358,032 for a book value of € 3,031,086.

Treasury shares

During the first half of 2024, Banca di Asti, Fondazione Cassa di Risparmio di Asti and Fondazione Cassa di Risparmio di Torino finalised an agreement aimed at the entry of Fondazione CRT into the share capital of the Bank with a stake of 6.00%, which led to the purchase by the latter of 4,232,223 shares (at a unit price of € 8.75) for a nominal value of € 21,838,271. The entire operation was aimed at supporting the strategic-industrial and long-term development of the Bank as one of the main proximity banks for Piedmont and the north of the country.

In addition, in 2024, 3,461,723 treasury shares were purchased, included in the reserve for treasury shares in portfolio, equal to 4.91% of the share capital, for a nominal value of € 17,862,491 and a consideration of € 30,160,535.

At the date of preparation of these financial statements (15 March 2025), the treasury shares in the portfolio are 505,922 (including 20,000 shares purchased and still to be settled) for a total book value of € 4,271,292.

Pursuant to Article 123-bis of the Consolidated Finance Act (TUF), Cassa di Risparmio di Asti S.p.A. has drawn up the "Report on Corporate Governance and Ownership Structures" for 2024. That report, approved by the Board of Directors on 15 March 2025, was made available to Shareholders and the public on the company website www.bancadiasti.it.

Corporate Governance Report pursuant to Article 123-bis



SHARE CAPITAL ACCOUNTS

Total Bank Own Funds and capital ratios

Total Bank Own Funds of the Cassa di Risparmio di Asti Group came to around € 999.06 million.

The CET1 Ratio (CET1/RWA) amounted to 15.34%, higher than the minimum requirement of 8.20% that the Group is required to comply with, as required by the Bank of Italy in its communication of 3 May 2024, upon conclusion of the periodic Supervisory Review and Evaluation Process (SREP). The minimum requirement of 8.20% includes the known “*Capital conservation buffer*” of 2.5%. The Tier1 Ratio (Tier1/RWA) coefficient amounts to 17.02% and the Total Capital Ratio (Total Own Funds/RWA) amounts to 17.25%; both ratios exceed the minimum requirement set by the aforementioned Supervisory regulations.

Bank Own Funds and equity ratios as at 31 December 2024 were calculated without including the profit for the fourth quarter of the year. The equity ratios calculated pro-forma including all profit for the year 2024 are: CET1 Ratio (CET1/RWA) at 15.54%, Tier1 Ratio (Tier1/RWA) at 17.22%, Total Capital Ratio (Total Own Funds/RWA) at 17.46%.

OWN FUNDS AND SOLVENCY RATIOS	2024	2023
Own Funds (€/thousand)		
Common Equity Tier 1 (CET1) capital net of regulatory adjustments	888,135	880,145
Additional Tier 1 (AT1) capital net of regulatory adjustments	97,567	97,567
Tier 1 capital (TIER1)	985,702	977,712
Tier 2 (T2) capital net of regulatory adjustments	13,360	50,432
Total Own Funds	999,062	1,028,144
Risk-weighted assets (€/thousand)		
Portion absorbed for credit and counterparty risk, including the portion absorbed by securitisations	38.23%	38.58%
Portion absorbed for market risk	0.38%	0.02%
- of which:		
a) trading portfolio risk	0.38%	0.02%
b) exchange rate risk	0.00%	0.00%
Portion absorbed for credit value adjustment (CVA) risk	0.40%	0.80%
Free portion	60.99%	60.60%
Portion absorbed by Operational Risk	7.35%	6.61%
Free portion	53.64%	53.99%
Total capital requirements	463,205.53	473,074
Excess	535,856.57	555,070
Total risk-weighted assets ⁽¹⁾	5,790,069	5,913,425
Solvency ratios (%)⁽²⁾		



SHARE CAPITAL
ACCOUNTS

CET1 Ratio (CET1/RWA)	15.34%	14.88%
Tier 1 Ratio (Tier1/RWA)	17.02%	16.53%
Total Capital Ratio (Total Own Funds/RWA)	17.25%	17.39%

(1) Total capital requirements multiplied by the inverse minimum mandatory ratio (8%).

(2) Fully-phased ratios calculated without including the profit for the period.

For the Group, the Bank of Italy, following the *Supervisory Review and Evaluation Process* (SREP) concluded with communication of 3 April 2024, notified the *Overall Capital Requirements* (OCR) to be respected at consolidated level equal to CET 1 Ratio at 8.20%, Tier 1 Ratio at 10.20% and Total Capital Ratio at 12.70% (all including the 2.5% capital conservation buffer).

As required by the instructions of the Bank of Italy, the statement of reconciliation of the shareholders' equity and profit (loss) for the year of the Parent Company with the consolidated shareholders' equity and profit (loss) for the year is attached to this report.

(figures in € thousand)	Shareholders' equity	Profit (loss) for the year
Parent Company shareholders' equity and profit (loss)	1,107,004	50,161
Book value of equity investments	-44,764	
Shareholders' equity book value of equity investments (pro rata)	57,842	
Higher values attributed (definitive goodwill)	66,269	
Lower values attributed (reversal of goodwill of subsidiary)	-34,000	
PPA of property, plant and equipment (buildings and land) and loans	24,971	
Alignment with the Group accounting standards:		
- accounting of buildings and land at deemed cost	3,012	
Consolidation for salary-backed loan transactions	-24,314	
Consolidation entries	-36,625	
Consolidation of company under significant influence at equity	-291	
Intercompany netting for dividends		-2,399
Pro-rata profit (loss) of subsidiaries		-60
Consolidated shareholders' equity and profit (loss)	1,119,104	47,702
Minority shareholders' equity and profit (loss)	30,487	3,527



SHARE CAPITAL
ACCOUNTS



SUSTAINABILITY STATEMENT

Index

ESRS 2 - General disclosures	“	98
Basis for preparation	“	98
Governance	“	101
Strategy	“	118
Impacts, risks and opportunities management	“	137
ENVIRONMENTAL INFORMATION	“	163
Disclosure pursuant to Article 8 of Regulation 2020/852 (EU Taxonomy Regulation)	“	163
E1 - Climate change	“	232
Strategy	“	232
Impacts, risks and opportunities management	“	233
Metrics and targets	“	240
SOCIAL INFORMATION	“	252
S1 - Own workforce	“	252
Strategy	“	252
Impacts, risks and opportunities management	“	254
Metrics and targets	“	268
S3 - Affected communities	“	275
Strategy	“	275
Impacts, risks and opportunities management	“	276
Metrics and targets	“	283
S4 - Consumers and end-users	“	285
Strategy	“	285
Impacts, risks and opportunities management	“	288
Metrics and targets	“	319
GOVERNANCE INFORMATION	“	321
G1 - Business conduct	“	321
Impacts, risks and opportunities management	“	321
Metrics and targets	“	331



ESRS 2 - GENERAL DISCLOSURES

Basis for preparation

BP-1 General basis for preparation of sustainability statements

This Sustainability Statement, compiled on a consolidated basis by the Cassa di Risparmio di Asti Group, has been prepared in compliance with the European Sustainability Reporting Standards (ESRS), as required by Directive 2022/2464/EU (CSRD, Corporate Sustainability Reporting Directive) and by Legislative Decree 125 of 6 September 2024, in order to provide the information necessary for understanding the Group's activities, its results, its impact on sustainability issues, as well as how sustainability issues affect its performance, its results and its financial situation with reference to the year 2024 (from 1 January to 31 December).

The reporting scope of economic and financial data and information, qualitative information and quantitative social and environmental data is the same as the Consolidated Financial Statements of the Cassa di Risparmio di Asti Group as at 31 December 2024, i.e. it includes Banca di Asti S.p.A. and the companies consolidated on a line-by-line basis in the Group's Consolidated Financial Statements.

In particular, the following companies are subject to line-by-line consolidation:

- Pitagora S.p.A.
- We Finance S.p.A.
- Maristella S.r.l.

The Cassa di Risparmio di Asti Group Sustainability Statement covers the Group's value chain in an integrated and consistent manner, with the aim of mapping and understanding its direct and indirect business relationships which could cause or contribute to generating an impact on people or the environment, or which could involve material risks and opportunities. The value chain includes the entire range of activities, resources and relationships related to the Group's business model and the external environment in which it operates, including both upstream and downstream actors that have a direct relationship with the same (the analysis carried out for the purposes of this report considered only the first *tier* of actors in the value chain). Therefore, the value chain of the Cassa di Risparmio di Asti Group was defined by distinguishing two main perspectives:

- "Company operations", including business relations with suppliers and business partners (upstream) and business processes (own operations) of all companies included in the scope of consolidation. This perspective includes both the direct transactions carried out by the Group through its Employees and Top Management and the activities of Suppliers and Commercial Partners for which the Group acts as a broker in a single segment of the value chain;
- "Business Activities", including the downstream part of the value chain concerning business activities and, in particular, the role of the Group as a lender and investor. The Customer is the main Stakeholder that, based on the service offered, is divided into retail Customer and corporate company. The business lines identified in this perspective, attributable to the services offered



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

by the companies of the Cassa di Risparmio di Asti Group and relevant in terms of ESG, include:

- loans to individuals for the purchase of real estate;
- business loans;
- investment portfolio.

The Cassa di Risparmio di Asti Group did not exercise the option to omit specific information corresponding to intellectual property, know-how or results of the innovation.

The Cassa di Risparmio di Asti Group is based in an EU Member State that allows the exemption from disclosure of information concerning upcoming developments or issues under negotiation, pursuant to Article 19 bis, paragraph 3 and Article 29 bis, paragraph 3, of Directive 2013/34/EU, but did not make use of this possibility of exemption.

The Cassa di Risparmio di Asti Group has defined short, medium and long-term time horizons in compliance with the requirements of the ESRs, in particular with the requirements of ESRs 1, and in alignment with regulatory developments and supervisory expectations such as the "EBA Guidelines: Consultation paper - Guidelines on the management of ESG risks". In particular, for the assessment of the impacts, risks and opportunities subject to assessment within the Double Materiality process, the Group has adopted the following time horizons:

- short term: the reference period corresponds to that of the financial statements, i.e. 1 year;
- medium term: up to five years from the end of the short-term reference period;
- long term: beyond five years.

Although some metrics include value chain data estimated on the basis of indirect sources, it should be noted that quantitative data with a high level of uncertainty are excluded in this document.

If estimated data are provided, the methodology adopted is always indicated, however none of this data presents significant uncertainties.

The metrics estimated on the basis of indirect data include Scope 3 emissions, which represent indirect greenhouse gas emissions from sources that are not owned or directly controlled by the Group. These emissions are often attributable to the value chain and consist of direct and indirect emissions from other organizations. The calculation frequently makes use of estimates and secondary data.

The bases for the assessment of Scope 3 emissions are included in the GHG Protocol Standard and in the ABI Lab Guidelines. The ABI Lab Guidelines are produced by the ABI Lab Green Banking Observatory, whose objective is to provide a common approach to the banking sector in the implementation of the disclosure obligations introduced by the CSRD. In particular, the Guidelines deal with the disclosures of the ESRs Sector Agnostic Standards relating to the metrics and targets of environmental topics.

**BP-2 Disclosures in
relation to specific
circumstances**

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

To improve the accuracy of future estimates relating to Scope 3 emissions, the Group plans to take several actions, including:

- the collection of more detailed primary data, undertaking to collect direct data from Suppliers and Employees to avoid exclusive reliance on general estimates or average data. In particular, with regard to the emissions generated by Paper and Cardboard Suppliers, the aim is to obtain more precise information;
- the use of updated guidelines, continuing to follow the ABI Lab Guidelines and other emerging best practices, monitoring progress in the standardization of methodologies and updating its approaches based on developments in regulations and technologies.

With these initiatives, the Group intends to increase the accuracy of future estimates, reducing the uncertainty deriving from the use of indirect sources and improving the overall quality of the environmental information provided in the Sustainability Statement.

The accuracy of the estimates is influenced by the representativeness of the sample and the quality of the data used. In general, the reliability of these metrics is linked to the soundness of indirect data sources, which, although useful for providing an overview, may not guarantee the same accuracy as direct metrics.

Please refer to section ESRS E1 relating to climate change for further information on the methodologies used to calculate the Group's consumption and emissions, including those relating to Scope 3, for which the Group is in its first year of reporting.

Following the decision to adopt the phase-in allowed for the reporting of the expected financial effects (Capex and Opex), including those related to climate risks, this declaration, prepared according to the CSRD directive, does not include monetary amounts characterized by a high degree of uncertainty. In reporting forward-looking information, including expected targets, uncertainties are inherent and, therefore, this information may be subject to change.

It should be noted that changes in the preparation and presentation of sustainability information, the resulting comparisons of information with previous periods, as well as disclosures of material errors and corrections of previous periods may not be shown for reporting periods prior to the first year of application of the ESRSs.

This reporting does not include information required by other regulations containing sustainability disclosure obligations or by generally accepted sustainability provisions.



Governance

The role of the administrative, management and supervisory bodies in relation to business conduct

In carrying out its services and activities, the Cassa di Risparmio di Asti Group operates in compliance with the highest standards of ethics, fairness and legality, as set forth in the Code of Ethics, the Corporate Governance Code and the Organizational Model pursuant to Legislative Decree 231/2001, as well as in the Group Regulations, approved by the Parent Company and implemented by the subsidiaries.

In addition, the Group's commitment in the area of governance is reflected in the definition of specific roles and responsibilities, with the ultimate aim of promoting the development of a shared culture that encourages the adoption of sustainable business models.

The Board of Directors is responsible for ensuring the adoption and enforcement of an effective Organizational and Management Model, aimed at preventing the commission of offences specifically indicated in Legislative Decree 231/01. To understand the scope of the document, the Model must be read together with the mapping of the activities at risk of offence related to the Special Part of the Model, the Internal Regulations of the Supervisory Body, the Regulation on disciplinary offences, the Regulation of mandated powers in Expenditure and the Group's Code of Ethics.

The Group Code of Ethics, approved by the Board of Directors with the opinion of the Supervisory Body (SB), outlines the principles of conduct that every employee, director and executive is required to follow. The Group condemns any behaviour adopted by anyone aimed at encouraging, facilitating and inducing the Directors of the Company to violate one or more of the principles indicated in the Code, in particular the principles of conduct in corporate obligations.

The Group also severely condemns any conduct aimed at altering the truthfulness and accuracy of the data and information contained in the accounting entries, in the financial statements and in other corporate communications addressed to shareholders, third parties, the public and the company carrying out the audit.

The Directors, Managers and Employees are required to behave lawfully, correctly and transparently in the performance of their duties, especially in relation to the requests made by the Shareholders, the Board of Statutory Auditors, the other Corporate control functions and the auditing firm in the exercise of their respective institutional functions and in compliance with the law, the Articles of Association, Supervisory regulations and internal regulations.

The Supervisory Body (whose functions are assigned to the Board of Statutory Auditors) is responsible for:

- monitoring and guaranteeing the enforcement and effectiveness of the Organizational and Management Model;
- supervising the functioning and compliance with the Organizational and Management Model adopted, also taking care of its updating;

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



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

- assessing, together with the competent Organizational Units, the initiatives to be taken, including operational ones, that are necessary for updating the Model;
- verifying the effectiveness and functionality of changes to the Model;
- reporting to the Board of Directors on the enforcement of the Model, with particular reference to the results of the supervisory activities carried out during the previous period and any interventions identified for its implementation;
- submitting to the Board of Directors, for approval, the "Operational plan of activities" prepared for the following year;
- expressing opinions on ethical-behavioural problems that could arise in the context of company decisions and alleged violations of the Code of Ethics, including on the basis of reports received or checks carried out;
- monitoring the periodic review of the Code and its enforcement mechanisms, including through the presentation of proposals for adjustments;
- promoting and monitoring initiatives aimed at encouraging the communication and dissemination of the Code to all parties required to comply with the principles and rules of conduct contained therein;
- carrying out the checks aimed at ascertaining that the behaviours implemented within the Group are consistent with the provisions of the Organizational Model, as well as the Group Code of Ethics;
- promoting adequate initiatives aimed at disseminating knowledge and understanding of the Group's Organizational Model and Code of Ethics;
- examining the information flows/reports addressed to the same in order to identify possible deficiencies in the functioning of the Model and/or possible violations of the same, or of the Group Code of Ethics;
- conducting, also following reports, the checks aimed at ascertaining possible violations of the provisions of the Model or the Group Code of Ethics, and activating the sanctioning process where appropriate;
- verifying that each component of the Model structure is and remains adequate to the needs of the Model itself, as defined by the Decree, also following changed business and/or regulatory conditions, as well as the occurrence of significant and/or repeated violations of the Model;
- supervising, together with the Corporate Control Functions, the enforcement and observance of the Code of Ethics.

Each new Director, Statutory Auditor, Employee and External Collaborator is also provided by the General Management with a set of information containing, among other things, the General and Special Part of the Model and the Group Code of Ethics, as well as the deed of the relative appointment/hiring/start of the collaboration relationship. The receipt of information is documented by means of suitable tools and serves to provide evidence of the Group's effective competence in the management of issues relating to the corporate culture.



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

The tables below show the number of members of the administrative, management and supervisory bodies with and without executive offices.

Number of members of the administrative, management and supervisory bodies with and without executive offices

Composition of the Board of Directors	Number of members	Ratio %
Executive members	2	16%
Non-executive members	11	84%

Composition of the Risk and Sustainability Committee	Number of members	Ratio %
Executive members	0	0%
Non-executive members	3	100%

Composition of the Related Parties and Remuneration Policies Committee	Number of members	Ratio %
Executive members	0	0%
Non-executive members	3	100%

Composition of the Board of Statutory Auditors	Number of members	Ratio %
Executive members	0	0%
Non-executive members	3	100%

It should be noted that there is no representation of Employees and other workers among the members of the administrative, management and supervisory bodies.

The members of the Board of Directors, the Board of Statutory Auditors, the Risk and Sustainability Committee and the Related Parties and Remuneration Policies Committee must comply with specific requirements of competence and professionalism established by current legislation with regard to the suitability of corporate officers in the banking sector.

The composition of the Board of Directors reflects the knowledge, skills and experience necessary for the fulfilment of its responsibilities. This includes that the Board overall has an adequate understanding of the areas for which the members are collectively responsible and the skills to effectively manage and supervise the Bank, including the following aspects:

- the Bank's activities and main risks associated with it;
- each of the Bank's material activities;
- relevant areas of sector/financial expertise, including financial and capital markets, solvency and models, environmental, social and governance risks and risk factors;
- accounting and financial reporting;
- risk management, compliance and internal audit;
- information technology and security;
- local, regional and global markets, where applicable;
- legal and regulatory context;

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

- managerial skills and experience;
- ability to plan strategically;
- management of (inter)national groups and risks related to group structures, where relevant.

In the Board of Directors appointed in May 2023, the skills and experience of the members therefore ensure a representation of heterogeneous professional profiles, with at least one representative for each of the following sectors: professional work or teaching, entrepreneurship, banking and credit. The presence of these diversified skills and experience ensures that all professional profiles are represented and contributes to the efficient functioning of the Board. Starting from 29 April 2024, with the appointment of Prof. Gola, the Board has been enriched by the presence of a member with experience in a banking group of a size and complexity equal to or greater than the Cassa di Risparmio di Asti Group.

The tables below show the composition of the administrative, management and supervisory bodies by gender.

Composition and diversity of members of the administrative, management and supervisory bodies

Composition of the Board of Directors	Number of members	Ratio %
Men	9	67%
Women	4	33%

The average ratio of female to male members for 2024 was equal to 0.33.

Composition of the Risk and Sustainability Committee	Number of members	Ratio %
Men	2	67%
Women	1	33%

The average ratio of female to male members for 2024 was equal to 0.33.

Composition of the Related Parties and Remuneration Policies Committee	Number of members	Ratio %
Men	1	33%
Women	2	67%

The average ratio of female to male members for 2024 was equal to 0.67.

Composition of the Board of Statutory Auditors	Number of members	Ratio %
Men	2	67%
Women	1	33%

The average ratio of female to male members for 2024 was equal to 0.33.

The tables below show the percentage of independent members of the administrative, management and supervisory bodies.



SUSTAINABILITY STATEMENT

GENERAL DISCLOSURES

Percentage of independent members of the administrative, management and supervisory bodies

Composition of the Board of Directors	Number of members	Ratio %
Independent members	5	38%
Non-independent members	8	62%

Composition of the Risk and Sustainability Committee	Number of members	Ratio %
Independent members	2	67%
Non-independent members	1	33%

Composition of the Related Parties and Remuneration Policies Committee	Number of members	Ratio %
Independent members	3	100%
Non-independent members	0	0%

Composition of the Board of Statutory Auditors	Number of members	Ratio %
Independent members	3*	100%
Non-independent members	0	0%

*as per current legislation

The Cassa di Risparmio di Asti Group – as per express regulatory provision, as well as in order to strengthen coordination, interaction and transparency between the Board of Directors, the Board of Statutory Auditors and the Corporate control functions – has established a specific committee internal to the Board of Directors of the Parent Company called "Risk and Sustainability Committee", which is assigned advisory, investigative and proposal-making tasks aimed at supporting the Board in the guidance and supervision of the overall Internal Control System, as well as in the determination and in the enforcement of risk management and control policies, both at individual level and with reference to the entire Group perimeter.

The responsibilities of the administrative, management and supervisory bodies with regard to impacts, risks and opportunities are formalized in the specific company regulations, as defined by the Group Sustainability Policies and the Group Policies on the Sustainability Declaration. In particular, the Group's Sustainability Policies provide for the following:

- the Board of Directors supervises the aspects of sustainability, approves the Policies and is responsible for strategic and organizational choices on the matter, including the identification of objectives related to the material impacts, risks and opportunities;
- the Risk and Sustainability Committee supports the Board of Directors in identifying the guidelines for the control of the overall risk assumed and its monitoring as part of the strategies and methodologies defined, and in the verification of the guidelines, objectives, plans and consequent sustainability processes adopted, in line with the Strategic Plan and the related

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

Sustainability Plan, as well as in the periodic monitoring of compliance with objectives and the progress of related activities;

- the Chief Executive Officer/General Manager defines the strategic objectives to be proposed to the Board of Directors. From time to time, they monitor the overall ESG activity, verifying that the initiatives underway are in line with strategic objectives and company priorities. They verify the emergence of any critical issue and assess the most appropriate methods for their resolution;
- the Management Committee of the Parent Company assists the Chief Executive Officer/General Manager in defining the strategic objectives to be proposed to the Board of Directors. From time to time, it monitors the overall ESG activity, verifying that the initiatives underway are in line with strategic objectives and company priorities. It verifies the emergence of any critical issue and assesses the most appropriate methods for their resolution.

The Board of Directors also periodically monitors and supervises the achievement of the ESG objectives and targets defined in the Sustainability Plan.

In fact, a report is regularly presented to the Board of Directors, submitted in advance to the Risk and Sustainability Committee, on the progress of the Sustainability Plan and, in general, regarding material sustainability issues.

In particular, with reference to the 2022-2024 Strategic Plan, the Board of Directors approved the Sustainability Plan, which contains the initiatives for the two-year period 2023-2024, defined according to the following areas of intervention:

- Integration of ESG risk factors in the phases of the credit process;
- Development of new products;
- Monitoring and reporting;
- Environment;
- Human Resources;
- Digitalization;
- Communication and relations with the territory.

With reference to the evolutionary path of the Group in the area of sustainability, on 6 February 2025 the Board of Directors also approved the new ESG strategic guidelines and objectives in the context of the 2025-2027 Sustainability Plan, broken down into the following areas of intervention:

- institutional positioning;
- sustainable business;
- direct environmental, social and governance impacts.

According to the provisions of the Group Policies on the Sustainability Declaration, the Board of Directors of the Parent Company is also responsible for:

- approving the Group Policies on the Sustainability Declaration in order to define and illustrate the principles, activities and processes relating to the preparation of the Sustainability Report pursuant to regulations and legislation at national and European level, outlining the roles and responsibilities of the different Functions involved and the different phases of



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

the process of preparing, approving and verifying the Sustainability Statement;

- assessing and approving the results of the Double Materiality analysis and the related list of material sustainability issues;
- approving the Sustainability Statement, which communicates the Group's commitment, results and improvement objectives in relation to sustainability issues, together with the approval of the annual report on operations as a dedicated section of the same.

As part of the broader responsibilities on sustainability issues, defined in its Regulations, the Risk and Sustainability Committee, in support of the Board of Directors, examines and assesses:

- the mapping of risks and negative impacts, updated annually during the preliminary activities aimed at preparing the Group Sustainability Declaration and implemented with the issues that emerged from the Double Materiality analysis conducted on certain categories of Stakeholders;
- the list of relevant sustainability issues, which includes the significant issues (so-called "material") defined through the Double Materiality analysis. These are the set of sustainability issues related to positive and negative, actual and potential impacts – directly caused by the organization or directly related to its value chain – on people or the environment in the short, medium or long term, and related to the risks and opportunities that have or can reasonably be expected to have a material influence on the development of the company, on its financial-asset situation, on its economic result and on cash flow in the short, medium or long term;
- the Sustainability Statement, with particular attention to the articulation and completeness of the contents.

The Chief Executive Officer of the Parent Company examines the results of the Double Materiality analysis, oversees the entire process carried out by the various competent Functions and assesses the Sustainability Statement proposal. Following this analysis and the sharing of the Sustainability Statement in the Risk and Sustainability Committee, the Chief Executive Officer proposes the Sustainability Statement to the Board of Directors for assessment and approval.

The Board of Statutory Auditors of the Parent Company is responsible for monitoring the completeness, adequacy, functionality and reliability of the Group's Sustainability Statement, as well as the adequacy of the organizational, administrative and reporting system so that correct and complete representation of the Group's activities, its results and its impacts emerges in the Sustainability Statement.

On 30 January 2025, the Board of Directors approved the results of the assessments conducted for the year 2024 with regard to the activities carried out as part of the process of preparing the Double Materiality analysis, taking them into account to guide the strategy and the guidelines aimed at defining the 2025-2027 Sustainability Plan.



Role of management in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities

For some time now, the Group has embarked on an evolutionary path in the area of sustainability, which first led to the activation of a multi-year ESG Project in 2022, connected to the 2022-2024 Sustainability Plan, with the aim of increasingly integrating these issues into the business and operating processes. Subsequently, a dedicated Organizational Unit was established in 2023, with the tasks of support, coordination and monitoring of the overall strategy and activities in terms of sustainability. The first step involved the establishment of a permanent cross-functional ESG work team at the beginning of 2022, which periodically reported on the progress of its projects to the managerial Steering Committee and the Operational Project Committee, composed of the entire management group of the Bank, including the Chief Executive Officer and a member of the Board of Directors (Chairman of the Risk and Sustainability Committee and a university professor expert in ESG issues). The Steering Committee guaranteed the managerial and leadership proposition aimed at defining ESG KPIs and stimulated the application and monitoring of the sustainability strategy.

The working group also reported to the Board of Directors of the Parent Company, through the Chief Executive Officer, with formal communication by means of internal reporting, the progress of the strategic guidelines, the medium/long-term objectives and the quantitative targets, highlighting from time to time the results achieved with respect to the predetermined performance indicators.

In 2023, following the establishment of the new ESG Organizational Unit, the ESG Project was evolved by shifting from a 10-Worksite working model to a 3-Thematic Area working model (Integration of ESG risk factors in the credit process phases, New product development, Monitoring and Reporting) with additional internal initiatives, falling within the activities of running the various Corporate Structures and monitored within the Project. The various Corporate Functions involved met periodically, coordinated by an Organizational Contact Person and reporting directly to the Project Manager (identified as a managerial figure from the company), in order to align themselves with the progress of their respective activities.

On 31 December 2024, the design phase ended and from January 2025 ESG issues are managed and implemented directly by the Corporate Structures, with the coordination and monitoring of the ESG and Sustainability Office, which reports periodically to the Management Committee, to the Chief Executive Officer/General Manager, the Risk and Sustainability Committee and, through the Chief Executive Officer, the Board of Directors of the Parent Company, with regard to the progress of the objectives, actions and quantitative targets related to the 2025-2027 Sustainability Plan.

In compliance with the Group Regulations, the ESG contact person of the Subsidiaries implements the Group's strategic guidelines on ESG issues and defines a system for monitoring and reporting to the company's top management and the Board of Directors on a semi-annual basis, coordinating continuously with the ESG and Sustainability Office of the Parent Company for periodic monitoring.



Expertise of the administrative, management and supervisory bodies

In order to guarantee a level of professionalism adequate to the operational and dimensional complexity of the Bank, the Board of Directors carries out, at least annually, a self-assessment activity of the suitability of the Directors to carry out their functions as well as the correct and efficient functioning of the Body.

The needs for training aimed at increasing knowledge of the Bank's business sectors, company dynamics and their evolution, the principles of proper risk management and sustainability issues, and also identified by taking into account the reference regulatory framework, are met through on-boarding and induction programmes.

As part of the training path, several on-boarding sessions were also held, in which the entire Board of Directors participated, conducted by the Managers of the Departments and Staff Services, in order to promote better knowledge of the business and regulatory context of the sector.

During 2024, with reference to ESG issues, the Governance Bodies participated in specific training programmes on the following topics: the governance of ESG factors in the banking business, EU Taxonomy, regulatory evolution on investment services from an ESG perspective, sustainable financial products and instruments, sustainability in credit between regulation and the market, ESG assessment of companies between methodological approaches and impacts on credit ratings, climate & environmental risk in banking supervision, the integration of ESG factors in the Bank's risk governance and sustainability disclosure. The Board of Directors includes a director with solid experience in sustainability, developed through the following experience:

- role of ESG Financial Accounting Lecturer at the Executive Master in Business Administration at the SAA;
- co-editor and co-author of the book ESG Report, Eutekne, 2021 and the second edition is being printed;
- author of articles such as "*The linkage between ESG performance and credit ratings: a firm-level perspective analysis, 2017, International Journal of Business and Management*".

Specialized training and previous experience in this area provide the Board of Directors with the necessary tools to analyse in depth the possible impacts of company activities, assess potential ESG risk factors and identify new business opportunities.

With regard to the skills of the administrative, management and supervisory bodies regarding the conduct of companies, the members of the Board of Directors have the necessary skills thanks to the professional experience gained in current or past positions, enhanced by training courses held annually. In particular, during 2024 they participated in training sessions on topics such as anti-money-laundering governance, corporate governance, internal controls and risk management in banks, supervisory duties of the Board of Statutory Auditors, supervisory activities on the bank's financial statements and the statutory audit, and the legal aspects of banking "sustainability": greenwashing and sanctions and the supervisory duties of the Board of Statutory Auditors.

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

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

The administrative, management and supervisory bodies, as well as the respective committees, are informed at least annually about the material impacts, risks and opportunities by sharing the results deriving from the Double Materiality analysis process. This process includes an in-depth assessment of the economic, environmental and social impacts, risks and opportunities, which are continuously monitored. In particular, the Management Committee of the Parent Company assists the Chief Executive Officer/General Manager in defining the strategic objectives to be proposed to the Board of Directors. From time to time, it monitors the overall ESG activity, verifying that the initiatives underway are in line with strategic objectives and company priorities. It verifies the emergence of any critical issues and assesses the most appropriate methods for their resolution, at the same time monitoring the integration of IROs (Impacts, Risks and Opportunities) in the company strategy in order to guarantee responsible and sustainable management. The assessments carried out and the results deriving from the Double Materiality process are subsequently presented to the Risk and Sustainability Committee and approved by the Board of Directors. The latter verifies the implementation and effectiveness of the measures adopted, ensuring that the policies, actions and metrics are appropriate to sustain the impacts, address the risks and seize the opportunities identified. In this way, the Group guarantees informed governance and constant monitoring, ensuring alignment with sustainability and social responsibility objectives.

These bodies also undertake to take into account material impacts, risks and opportunities in the supervision, control and determination of the corporate strategy. In particular, in defining the main strategic decisions and significant transactions, the governance bodies ensure that the economic, environmental and social impacts, risks and opportunities identified through the Double Materiality process have been considered. They also undertake to pursue a growing implementation of IROs and related ESG issues in all areas that define the Group's structure and business with the aim of enhancing positive impacts and opportunities and limiting negative impacts and risks with adequate mitigation tools.

The Group has identified a list of material impacts, risks and opportunities that are the subject of this report pursuant to the CSRD. This list, shared with the Risk and Sustainability Committee first on 1 October 2024 and subsequently on 28 January 2025, was submitted to the Board of Directors for assessment as part of the broader Double Materiality analysis process, with preliminary approval on 3 October 2024 and definitive approval on 30 January 2025. The Group undertakes for future years to focus on and monitor the impacts, risks and opportunities considered most material both for its operations and to align itself with the best market practices, highlighting them to the administrative, management and supervisory bodies and to their relative committees.

Please refer to the ESRS 2 SBM-3 section for the complete list of IROs.



The Remuneration and Incentive Policies, updated annually, are prepared by the Parent Company for all Group companies, examined by the Related Parties and Remuneration Policies Committee of the Parent Company and subsequently presented and approved by the individual Boards of Directors of the companies of the Group. The "Document on Remuneration and Incentive Policies and their implementation" is finally submitted for approval to the Shareholders' Meeting.

These Policies are a fundamental tool to support the Group's medium and long-term strategies, with the aim of arriving at – in the interest of all Stakeholders – remuneration systems that are increasingly linked to company results, appropriately adjusted to take into account all risks, consistent with the levels of capital and liquidity needed to deal with the activities undertaken and, in any case, such as to avoid distorted incentives that may lead to regulatory violations or excessive risk-taking.

The remuneration package that the Group makes available to employees is geared towards achieving medium-long term objectives and is balanced according to the reference category, on the basis of fixed and variable components. The variable component of remuneration is mainly based on performance measurement, which takes place over both annual and multi-year time horizons. The goal is to involve and guide people towards medium and long-term strategies, recognizing the value of individual and team contributions. The remuneration policy for the variable part complies with the objectives (both strategic and operational, quantitative and qualitative, financial and non-financial) that are subject to three-year strategic planning and annual breakdown in specific budgets for the year, and at the level of individual Group companies, in line with the medium-term programme approved by the competent Boards of Directors.

At the individual company level, the total amount of variable remuneration allocated to employees is symmetrical with respect to the results actually achieved, until it is significantly reduced or zeroed in the event of lower than expected or negative performance. The Group has the right to provide that the variable remuneration may be paid, in whole or in part, also through plans based on financial instruments issued by Group companies (e.g. shares, instruments linked to them – e.g. phantom shares – and bonds) in order to incentivize and stimulate the improvement of individual performance and link incentives to the creation of long-term value. The use of shares or other related instruments is subject to prior authorization by the Shareholders' Meeting and to the applicable corporate and regulatory obligations.

Variable remuneration for employees consists of a bonus system linked to economic results and/or specific objectives (current National Collective Labour Agreement for the Credit sector – company bonus). The criteria and methods for determining and disbursement of this remuneration are subject to negotiation with the Trade Unions. The incentive scheme is linked to the achievement of quantitative and qualitative objectives referring mainly to the individual organizational units. The maximum limit of incidence of the variable component with respect to the fixed component of the Group's personnel is broken down as follows:

- 70% for the Chief Executive Officers or General Managers of the Group Companies;

**GOV-3 - Integration
of sustainability-
related
performance in
incentive schemes**

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

- 33.33% for "identified Staff" belonging to the Corporate Control Functions;
- 100% for disbursements made to loan brokers, insurance intermediaries and financial agents;
- 50% for the remaining personnel. This limit of 50% may be raised to 100% in the case of exceptional disbursements paid to newly hired personnel, limited to the first year of employment and to plans to enhance the commercial contribution of resources from the labour market.

In compliance with the Supervisory regulations on Remuneration Policies, with a view to ensuring remuneration systems in line with medium-long term corporate strategies and objectives, more detailed rules are applied to "identified Staff" regarding the methods of payment of the variable compensation paid, due to the impact that their activity may have on the risk profile assumed by the Company to which they belong and by the Group as a whole. In line with the provisions of the Supervisory regulations and in close connection with the type of commercial bank focused on the medium/long term and mainly oriented to private customers and small/medium enterprises, whenever the amount of the variable component shall reach levels such as to potentially generate conflicts of interest in conduct and decisions, the following structure and methods of payment of bonuses are applied to the Group's "identified Staff": part of the variable remuneration component is subject to immediate disbursement (up-front) for a portion of 60%. The remainder of the variable component, equal to 40%, is disbursed with a four-year deferral. For both the immediate and deferred components, a portion of at least 50% of the bonus is disbursed in financial instruments issued by the Group Companies (shares, instruments linked to them – e.g. phantom shares – and/or subordinated notes of Banca di Asti or other instruments identified in Delegated Regulation EU 527 of 12 March 2014) and is subject to retention clauses that align the incentives with the long-term interests of the Company to which they belong. The retention period for financial instruments paid "up-front" is 2 years, while for the deferred component it is 1 year. The retention period starts from the moment when the deferred remuneration (or a portion thereof) is paid. In line with the normal practice of the national banking system and in compliance with the provisions in force, the payment mechanisms set out above apply to identified Staff whose annual variable remuneration exceeds EUR 50,000 or represents more than one third of the total annual remuneration. The "particularly high" amount of variable remuneration, a threshold beyond which the deferral of accrued premiums is equal to 60%, is set at EUR 424,000 with a deferral period of no less than five years.

The model prepared for the recognition of the incentive component to be allocated to "identified Staff" identifies the main strategic drivers and a set of performance indicators. The performance relating to the achievement of objectives is measured in a range that goes from 70% to 100% of the target value (which normally coincides with 100% of the budget value). The objectives are measured by means of indicators whose minimum threshold for access to the incentive (bonus opportunity) is set at 70%, which corresponds to a disbursement equal to 50% of the bonus; once this threshold is exceeded, the bonus calculation mechanism is triggered with linear progression



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

(from 50% up to 100%) with respect to the percentage of achievement of the objective (from 70% to 100%). The performance indicators identified for the purposes of the assessment and subsequent disbursement of the Incentive Bonus include the following indicators for some figures: "Achievement of the planned objectives/initiatives in implementation of the Sustainability Plan" and "Implementation of the Sustainability Plan (Initiatives under responsibility)".

All Group companies pay the utmost attention so that the remuneration and incentive systems do not conflict with the company's objectives and values, with medium/long-term strategies and with prudent risk management policies, avoiding the occurrence of conflicts between the interests of individual parties and company interests. In addition, the Parent Company also pays attention to the issues of sustainability and ESG (Environmental, Social and Governance) values in the implementation of the Remuneration and Incentive Policies. The Group is continuing its development process, which envisages, with reference to incentive schemes, a progressive implementation towards measurement metrics of quantitative indicators, including ESG metrics, according to a modular approach for the different roles and responsibilities with the provision of a progressive expansion of the perimeter to Employees which can affect their behaviour and performance.

Specifically, among the performance indicators envisaged for "identified Staff" is the indicator "Implementation of the Sustainability Plan - Initiatives under responsibility", according to which the portion of variable remuneration that depends on objectives and/or impacts related to sustainability is 10%.

The Group due diligence process is not an autonomous and formalized procedure, but is fully integrated into the strategic guidelines and business processes. This approach ensures its integration into the Bank's activities, also contributing to the prevention, management and mitigation of negative impacts.

The tables below illustrate the mapping of the material negative impacts that emerged from the Double Materiality analysis, in correlation with the most directly affected business processes identified within the Group taxonomy, and with the related main controls implemented.

**GOV-4 - Statement
on due diligence**

Impacts in the Operations perspective

ESRS – Sub-topic	Type of Impact in the Operations perspective	Main business processes impacted	Main controls identified
E1 – Climate Change <i>Climate change adaptation</i>	<ul style="list-style-type: none"> Potential impact on ecosystems, people and the economy due to regulatory uncertainty, rising costs and technological obsolescence related to a disorderly and late transition to eco-sustainability. 	<ul style="list-style-type: none"> Management and maintenance of real estate Energy and plant management Management of infrastructural resources 	<ul style="list-style-type: none"> Sustainability Plan
E1 – Climate Change <i>Climate change mitigation</i>	<ul style="list-style-type: none"> Actual impact on ecosystems, people and the economy due to the occurrence of extreme climate events related to GHG emissions. 	<ul style="list-style-type: none"> Management and maintenance of real estate Energy and plant management Management of infrastructural resources 	<ul style="list-style-type: none"> Sustainability Plan



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

E1 – Climate Change <i>Energy</i>	<ul style="list-style-type: none"> Actual impact related to the consumption of electricity which, fuelled for the most part by the combustion of fossil fuels, produces large quantities of greenhouse gases such as carbon dioxide, methane and nitrous oxide, which contribute to climate change and have a negative impact on the environment. 	<ul style="list-style-type: none"> Management and maintenance of real estate Energy and plant management Management of infrastructural resources 	<ul style="list-style-type: none"> Sustainability Plan
S1 – Own workforce <i>Other work-related rights</i>	<ul style="list-style-type: none"> Potential impact of socio-economic gaps related to the failure to respect basic rights of workers, such as the use of child and forced labour, as well as human rights, such as respect for privacy. 	<ul style="list-style-type: none"> Acquisition of Human Resources Human Resource Management and Development Administrative management of Personnel Training Management of personal data protection obligations 	<ul style="list-style-type: none"> Code of Ethics Group policies on the processing of personal data Group policies on internal reporting of violations Group Sustainability Policies Policies on Diversity, Equity, Inclusion
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end users</i>	<ul style="list-style-type: none"> Potential impact of the dissemination of sensitive/confidential information due to inefficient management of the security systems and privacy of Customers. 	<ul style="list-style-type: none"> Security management 	<ul style="list-style-type: none"> Company policies on information security Group policies on the processing of personal data Company policies on data security and IT risk management
G1 – Business conduct <i>Corruption and bribery</i>	<ul style="list-style-type: none"> Potential impact on the conduct of the company relating to the absence of policies and appropriate control over corruption. 	<ul style="list-style-type: none"> Management of regulatory obligations - Anti-money laundering Compliance management Management of contracted services Purchasing management 	<ul style="list-style-type: none"> Organizational Model Legislative Decree 231/01 Guidelines on respect for human rights in the Code of Ethics Reference to the Code of Ethics in agreements with Suppliers Regulatory and operational provisions on money laundering risk management Regulatory and operational provisions on the management of the supply of goods and services

Impacts in the Business perspective

ESRS – Sub-topic	Type of impact in the Business perspective	Main business processes impacted	Main controls identified
E1 – Climate Change <i>Climate change adaptation</i>	<ul style="list-style-type: none"> Potential impact Exposures to companies that generate an impact on ecosystems, people and the economy due to regulatory uncertainty, rising costs and technological obsolescence related to a disorderly and late transition to eco-sustainability. 	<ul style="list-style-type: none"> Credit 	<ul style="list-style-type: none"> Group lending policies
E1 – Climate Change <i>Climate change mitigation</i>	<ul style="list-style-type: none"> Actual impact linked to loans to individuals for the purchase of properties whose 	<ul style="list-style-type: none"> Credit 	<ul style="list-style-type: none"> Group lending policies Sustainability Plan



SUSTAINABILITY STATEMENT

GENERAL DISCLOSURES

	energy performance has an impact on climate change.		<ul style="list-style-type: none"> Expansion of the range of ESG credit products for customers
E1 – Climate Change <i>Climate change mitigation</i>	<ul style="list-style-type: none"> Potential impact Exposures to companies that generate an impact on ecosystems, people and the economy due to the occurrence of extreme climate events related to GHG emissions. 	<ul style="list-style-type: none"> Credit 	<ul style="list-style-type: none"> Group lending policies
E1 – Climate Change <i>Energy</i>	<ul style="list-style-type: none"> Potential impact Exposures to companies that generate an impact related to the consumption of electricity which, fuelled for the most part by the combustion of fossil fuels, produces large quantities of greenhouse gases such as carbon dioxide, methane and nitrous oxide, which contribute to climate change and have a negative impact on the environment. 	<ul style="list-style-type: none"> Credit 	<ul style="list-style-type: none"> Group lending policies
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end-users</i>	<ul style="list-style-type: none"> Potential impact Exposures to companies that generate an impact related to the dissemination of sensitive/confidential information due to inefficient management of the security systems and privacy of Customers. 	<ul style="list-style-type: none"> Credit Proprietary finance Investment services 	<ul style="list-style-type: none"> Group lending policies Group policies on financial investments Group policies on liquidity Group policies on the service model and range of financial products and services
G1 – Business conduct <i>Corruption and bribery</i>	<ul style="list-style-type: none"> Potential impact Exposures to companies that generate an impact on the conduct of the company related to the absence of policies and appropriate control over corruption. 	<ul style="list-style-type: none"> Credit Proprietary finance Investment services 	<ul style="list-style-type: none"> Group lending policies Group policies on financial investments Group policies on liquidity Group policies on the service model and range of financial products and services

The table below presents a mapping that illustrates in which points of this document the main aspects and phases of the due diligence process are addressed, in order to provide an overview of the actual practices adopted by the Group in relation to the due diligence.

Fundamental elements of due diligence	Paragraphs in the Sustainability Statement
➤ Integrate due diligence into governance, strategy and business model	ESRS 2 GOV-2, ESRS 2 GOV-3, ESRS 2 SBM-3
➤ Involve stakeholders in all key phases of due diligence	ESRS 2 GOV-2, ESRS 2 SBM-2, ESRS 2 IRO-1
➤ Identify and assess negative impacts	ESRS 2 IRO-1, ESRS 2 SBM-3
➤ Intervene to address negative impacts	ESRS E1-3, ESRS S1-4, ESRS S3-4, ESRS S4-4, ESRS G1-3
➤ Monitor the effectiveness of interventions and communicate	ESRS E1-4, ESRS E1-5, ESRS E1-6, ESRS S1-3, ESRS S1-5, ESRS S1-6, ESRS S1-7, ESRS S1-8, ESRS S1-9, ESRS S1-12, ESRS S1-14, ESRS S1-16, ESRS S1-17, ESRS S3-3, ESRS S3-5, ESRS S4-3, ESRS S4-5

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT**GOV-5 - Risk
management and
internal controls
over sustainability
reporting**

In light of the provisions of the Legislative Decree transposing the CSRD (Legislative Decree 125/2024), which fully incorporates Directive 2464/2022, the Group has expanded the scope of internal controls in place in order to also detect, measure and verify the risks associated with Sustainability Statement, setting up a process aimed at providing reasonable assurance on the achievement of the objectives, as well as on the environmental, social and governance data and information reported.

The Group has updated and intends to continue to integrate the current internal control system and the related underlying processes so that the Sustainability Statement is prepared in compliance with reporting standards and current legislation. The current Sustainability Statement Control System model is based on the CoSO Framework, developed by the Committee of Sponsoring Organizations of the Treadway Commission, adopted as an international reference for the creation, updating, analysis and assessment of internal control systems.

On 30 March 2023, the CoSO published a supplementary guide for organizations, with the aim of ensuring effective internal control on sustainability reporting (ICSR), referring to the CoSO Internal Control – Integrated Framework.

The components of the CoSO Framework model represent the essential elements of an effective Internal Control System and can be described as follows:

- Control environment: makes it possible to reflect the importance of the internal control culture in the organization of the company, developed by the Executives with particular attention to integrity and ethical values, the management philosophy and style, the organizational structure, the attribution of authority and responsibilities, personnel management policies and personnel skills;
- Risk Assessment: makes it possible to assess the risks that could have an impact on the achievement of company objectives through the definition of risk identification and analysis methods;
- information and communication: this allows the correct management of information flows between the various Corporate Structures, so that all the subjects belonging to the structure correctly carry out the activities for which they are responsible;
- control activities: the set of activities that allows correct management of risks in order to achieve the pre-established company objectives;
- monitoring: makes it possible to continuously verify the reliability of the Internal Control System implemented.

With regard to sustainability, the Group has launched a process for the design, establishment, application, management and assessment of a specific internal control and risk management system, envisaging a top-down and risk-based approach in order to guarantee the appropriate identification and adequate supervision of the areas and activities most exposed to the risk of fraud or unintentional errors relevant to Sustainability Statement.

The model at the basis of an integrated Internal Control System is divided into its dimensions of specific analyses, which include controls at the process level which are aimed at verifying the effectiveness of the controls on the processes examined,



guaranteeing the correct generation of non-financial data. Consequently, the reliability of non-financial information is ensured by the presence of a well-structured Internal Control System, which makes it possible to ascertain the adequacy and effective continuous application of these processes, as required by the CoSO Report methodology.

The risks considered for the purposes of the analysis of the internal control system are those relating to data collection and the preparation of sustainability statement. In particular, the main risks that emerged concern the non-compliance of the information reported with the applicable regulatory requirements and the possible incompleteness, imprecision and non-appropriateness of the data; with regard to the qualitative characteristics of the information envisaged by Appendix B of the ESRS 1, the risk of non-compliance with the relevance, faithful representation, comparability, verifiability and comprehensibility of the data emerged.

The risks were identified taking the most material ones into account, assessing their potential impact and probability of occurrence. The main types of controls on sustainability statement processes include quality controls in the transfer of data between systems, where necessary, controls carried out by the line, including those of the reasonableness of the data with respect to those collected in previous years, and validation by the Data Manager. In addition, application controls are envisaged on the software that supports the consolidation of contributions, in addition to controls by the team responsible for Sustainability & Stakeholder Engagement Reporting, both with regard to perimeter activities and to ensure the consistency of the data collected by the various contributors.

The internal control system, as described above, provides the Group Corporate Bodies with an effective tool, at a consolidated level, for the management and monitoring of major risks.

In particular, the reporting flows relating to the outcome of the monitoring activities are periodically reported to the Board of Directors of the Parent Company through a specific annual report, at the same time as the approval of the annual consolidated financial statements and concern:

- any critical issues that emerged in the performance of the envisaged functions;
- the suitability of the Internal Control System;
- plans and actions defined to overcome any critical issues identified.

For each corrective action, the person responsible for its implementation is identified, and the intervention time-frame is defined.

For any shortcomings identified, follow-up activity is envisaged to verify the actual implementation of the remedial actions and the consequent overcoming of the shortcomings flagged by the internal control system and identified in the Sustainability Report.

The internal control system also envisages, at least annually, validation by the designated parties within the reporting system of the data and information provided for the purposes of Sustainability Statement.



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

Specific training activities are also planned to raise the awareness of all parties involved in the sustainability statement process regarding the importance of providing complete and accurate data and information.

The test activities were carried out, for the year 2024, on a total of no. 58 "high priority" controls, for which, in light of the analysis activities carried out for the risk assessment and the related control designs, it is possible to declare that:

- the assessment of controls is for the most part "adequate";
- all controls were confirmed by the process owner and no anomalies were highlighted;
- for all controls with a positive TOD outcome, it was possible to carry out the TOE as all control owners replied to the questionnaires;
- for 3 controls, the TOE was partially adequate due to some procedural problems; in particular, no evidence was produced of validation of the data by the Process Manager before its consolidation into the Sustainability Statement.

Strategy

**SBM-1 – Strategy,
business model and
value chain**

The Cassa di Risparmio di Asti Group is strongly rooted in the territory, with the aim of offering complete, innovative financial solutions oriented to the needs of its Customers, both private and corporate. The business model is distinguished by a balance between tradition, Customer focus and technological innovation, with a constant commitment to sustainability and local development.

- Banking Services and Innovation

The Group offers a wide range of banking products and services: checking accounts, loans, mortgages, credit cards, savings and investments, as well as personalized financial consulting services. The bank's continuous digital evolution allows Customers to access innovative services through online and mobile platforms, ensuring safe and convenient management of their finances.

- Focus on the Territory

The commitment is expressed in a strong link with the territory served. The Group is a point of reference for households, small and medium-sized enterprises and local institutions, offering financial solutions designed to meet the specific needs of the community. Lending is aimed at encouraging the economic and social development of the area, contributing to the collective well-being.

- Sustainability and Social Responsibility

The Group is strongly committed to promoting sustainability and social responsibility. In addition to prudent economic management, it invests in initiatives to support the community and the territory, promoting cultural, social and environmental projects. The integrated vision of sustainability reflects the importance of reconciling financial objectives with social and environmental needs over the long term.

- Advisory Approach and Customer Orientation

The Group Companies place the Customer at the centre of their activities, offering a highly personalized service, based on an in-depth knowledge of individual needs.



The consulting is aimed at providing tailor-made financial solutions, with an approach that integrates competence, trust and transparency. In addition, an organizational structure was adopted to ensure control of its activities in the credit and financial sector, with the support of the coordination activities carried out by the Parent Company.

In accordance with the business lines defined along the downstream value chain, the main products and services offered by the Cassa di Risparmio di Asti Group are listed below, mainly divided into products for individuals and households and products and services for businesses and professionals:

- **Offering to companies:** checking accounts, ordinary and subsidized loans, factoring and leasing services, banking services for foreign operations, payment, debit and credit cards to meet the needs of small and large companies, as well as freelancers, in a concrete and advantageous manner.

In particular, in 2024, Banca di Asti launched a new product to support investments related to the Transition Plan 5.0 and renewed some ceilings. In September 2024, the **"Sustainability Linked-Loan"** was introduced, intended for companies that, on the one hand, make new investments in production facilities as part of innovative projects to reduce energy consumption, and on the other hand submit the application to obtain a tax credit (up to 45% of the expenditure incurred) pursuant to art. 38 - Transition 5.0, of Italian Law Decree no. 19 of 2 March 2024, converted into Law no. 56 of 29 April 2024, and the implementing Decree Transition 5.0 of the Minister of Enterprises and Made in Italy, in collaboration with the Minister of Economy and Finance, published in the Official Gazette no. 183 of 06/08/2024. In support of this, three new loan lines were activated: **Agricoltura Sostenibilità 5.0**, **Innovando Sostenibilità 5.0** and **Nuova Sabatini – Linea Sostenibilità 5.0**. Through these products, the Bank offers a subsidy that provides for the charge of processing fees only if the financed innovation project is not reported. To avoid these expenses, the company must provide the Bank with a copy of the ex post certification required by art. 15, paragraph 1, letter b) of the Implementing Decree, submitted to the GSE. In this way, the Bank will not apply the processing fees at the time of disbursement of the loan, but may do so if the company does not provide the aforementioned certification. In addition, to incentivize and support companies' investments in projects that have a positive impact in terms of sustainability, the **"Nuove Energie"** and **"Risparmio Idrico"** ceilings were renewed, equal respectively to EUR 100 million and 50 million, dedicated to the granting of medium/long-term mortgage, land and unsecured loans aimed at financing plants for the production of electricity from renewable sources and investments that promote water savings (such as precision irrigation systems, rainwater collection tanks, etc.), providing for a 60% discount on preliminary processing costs. Lastly, the **"Eventi Calamitosi"** ceiling of EUR 30 million was maintained, intended to support the company's working capital and finance the restoration of

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

production systems (buildings, machinery, greenhouses, vineyards, orchards, etc.) damaged by disasters linked to climate change, with particularly advantageous interest rate conditions and full discount of processing fees.

- **Offering to individuals:** checking accounts, Erbavoglio personal loans, real estate mortgages, debit and credit cards and customized investment solutions to meet the needs of private customers at advantageous conditions. Among the activities carried out by the Bank, those that have determined material positive impacts for each of the following categories are highlighted:
 - **minors:** in October 2023, as part of the offering of products and services for young people, the need emerged to renew the catalogue dedicated to them. The new product, **Conto Corrente IO CONTO 0-17**, allows young people to gradually approach savings and develop an age-appropriate decision-making and economic autonomy. Children from 0 to 13 years old can be account holders and from 14 to 17 years old can use their Debit Card. In any case, bank counter transactions can only be carried out by the parents.
 - **young adults:** several dedicated products have been created as part of the offering reserved for young adults between the age of 18 and 30, including:
 - **Conto Semplice Young 18-30:** a totally free account with a free debit card that allows access to liquidity and the possibility of operating in total autonomy and freedom;
 - **Erbavoglio Young 18 - 30:** a loan with a subsidized rate (TAN 7.50%) for an amount between EUR 1,500 and EUR 15,000 which allows access to credit at favourable conditions. If requested online, the TAN is 7.25%;
 - **Consap:** the guarantee of the Prima Casa Consap Fund was introduced to allow access to credit for the purchase of a first home for under 36 young adults;
 - **Study with EV initiative:** to support the right to education, this initiative was created, which makes it possible to apply for a loan to support the costs of a degree course, a master's degree or a higher education school at a subsidized rate of 7.25%;
 - **SBAM:** in order to foster the passions of young people, the SBAM initiative was held for two consecutive years, with which more than 4,000 young people who joined the Bank for the first time by opening a checking account were rewarded with a EUR 300 credit to spend on experiences;
 - **Plafond "Giovani":** in order to favour, facilitate and support young people in the purchase of a property, the bank has provided 3 ceilings dedicated to the target (max 35 years of age) at favourable conditions.



- employees: as part of the offering reserved for them, the following products are highlighted:
 - **Conto Corrente 27 and 27Plus**: checking accounts dedicated to workers who intend to deposit their salary;
 - **Erbavoglio Gold**: a loan to support personal and/or family expenses with the possibility of postponing the payment of instalments for 6 months;
 - **Mutuo Rata Protetta**: to meet the needs of some customers, the offering of the mortgage loan called "Casanova Rata Protetta" has continued, with the aim of having a product in the catalogue that, given the situation of uncertainty and market volatility of rates, ensures the peace of mind of a predetermined maximum rate. The variable rate mortgage offers the certainty of a maximum rate ("cap") even if a certain threshold of the reference parameter (6-month Euribor) is exceeded;
 - **Mutuo Rata Certa**: in January 2024, Banca di Asti's commercial offering was further enriched with a new type of mortgage called "Casanova Rata Certa", to meet the needs of those customers who want the peace of mind of a predetermined monthly expense. In fact, the new mortgage provides for a constant payment (defined when the economic conditions are agreed) and a duration of 20 years. In the event of an increase in rates, the instalment remains constant and the duration of the amortization plan is extended up to a maximum of 35 years, after which the residual instalments are recalculated;
 - **Consap**: membership in the Guarantee Fund for the first home (Consap) to support access to long-term credit (Mortgages).
- retirees: as part of the offering dedicated to them, the following products are highlighted:
 - **Conto Pensione**: the checking account dedicated to retirees who intend to deposit their pension;
 - **Cessione del Quinto della Pensione**: a non-purpose loan, up to EUR 75,000, which allows realizing personal projects through a convenient direct debit of the instalments from the pension.
- financially disadvantaged parties: the offering reserved for them includes the following products:
 - **Conto di Base**: this is proposed as a tool with a social purpose to ensure the financial inclusion of even the weakest segments of the population;
 - **Consap**: membership in the Guarantee Fund for the first home (Consap) to support access to long-term credit (Mortgages) for financially disadvantaged groups.

Aware of the diversification of its customers and the importance of offering sustainable financial solutions, the Bank has also developed several "green" initiatives. These include "... **Muoviamoci con Erbavoglio**", a subsidized personal loan to encourage

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

the purchase of full electric or hybrid vehicles with a subsidized rate of 7.75% and the "**Mutuo GREEN**" Ceiling, a mortgage loan with advantageous conditions, which provides a variable rate with a 50% discount on processing fees for the purchase of residential properties belonging to at least energy efficiency class A.

To respond more effectively to market needs and consolidate the Bank's commitment to the ecological transition, the "**Green T**" Ceiling was also introduced, aimed at supporting the purchase of residential properties with specific sustainability characteristics, offering a subsidized rate with 3-year option at fixed start of 2.90%.

- **Direct Channels:** digital services for businesses and individuals, such as Internet Banking and Mobile Payments;
- **Insurance sector** for companies, professionals and individuals, including Welfare with a service card for the family.

As a distributor of insurance products and services, the Group is committed to the continuous improvement of the products offered to its customers. During 2024, the range of products in the catalogue was further expanded. The Helvetia Company has prepared a new type of Stand Alone coverage, in compliance with the legal provisions envisaged following the change in the reference legislation (Official Journal no. 247 of 21/10/2022), calling it "**HELVETIA DECENNALE POSTUMA Indennitaria L210**", aimed at construction companies or real estate companies for the protection of buyers of residential properties with building permits issued starting from 5/11/2022 and mandatory for the signing of the sale contract.

In 2024, thanks to the collaboration with the CNP Assurances Company, the product called "**Doppia Vita**" was also introduced in the catalogue, a temporary death insurance policy, collective with individual membership, designed to protect the Member - Natural Person in the event of an irreversible event, whatever the cause, with compensation in the event of death and a Bonus in case of survival of the insured at the due date of the policy.

With reference to the AIG Company, the product called "AmministrandD&O Plus" was replaced in the catalogue from July 2024 with the new product "**PRIVATE EDGE BANCASSURANCE AMMINISTRAND&O**" dedicated to the corporate sector.

This product structurally has the same group of guarantees as the previous product, namely:

- Basic Guarantee: Manager's liability (mandatory);
- Additional Guarantee: Civil liability of the Company (optional);
- Additional Guarantee: Company liability deriving from the management of employment relationships (optional).

In addition, it offers the possibility of integrating these guarantees with numerous innovations, such as additional guarantees not previously present and the modulation of limits according to specific business needs.



"Salutissima" Offer

The focus on "Welfare" areas remains strong, and is also integrated with the "health care" component through the collaboration with Salutissima SMS ETS (Salutissima Società di Mutuo Soccorso - Ente del Terzo Settore). Salutissima offers its **Health Plans** through its Supporting Members (among which Banca di Asti stands out for being the main one), which are real partners of the Società di Mutuo Soccorso (Mutual Aid Company). This allows their Customers to identify the solution they need with a simplicity and effectiveness that are more suitable for the needs of individuals and their families.

During 2024, the range of Mutual Plans dedicated to Banca di Asti Customers was expanded, with the introduction of health coverage dedicated to target customers defined as "Private". These Customers have the opportunity to take advantage of unlimited maximum coverage for hospital services for singles and/or the entire family and high maximum coverage for other out-of-hospital services (e.g. diagnostic tests, specialist visits, physiotherapy, reimbursement for lenses, etc.).

Banca di Asti joins Salutissima with the integration of **additional free services** such as, for example, legal advice by telephone, a free subscription to a health and well-being magazine and the possibility of taking advantage of discounted rates to benefit from health services in the numerous affiliated centres in the area.

- **Loans granted by Pitagora and We Finance** with products such as **wage-backed or pension-backed loans, payment delegation** for public employees, **TFS advance** (end of service indemnity) and the **GiustoXte loan** (the latter two granted only by Pitagora).
- **Management of real estate assets by Immobiliare Maristella**: its services include the purchase, enhancement, renovation and operation of real estate activities of all kinds up to alienation of the property.

As at 31 December 2024, the Customers of the Cassa di Risparmio di Asti Group were broken down as follows:

- **Private individuals** (458,021 Customers);
- **Retail Companies** (59,579 Customers);
- **Individual or similar companies** (12,017 Customers);
- **Corporate** (3,366 Customers);
- **Joint-stock companies** (2,149 Customers);
- **Partnerships** (660 Customers);
- **Entities** (176 Customers).

No specific information was indicated on groups of Customers eliminated or on new markets and there are no prohibited products within the markets; therefore, there are no significant changes in the reference period based on the data provided.

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

It should also be noted that the Group does not operate in the following sectors:

- fossil fuels (coal, oil and gas), including a breakdown of revenues from coal, oil and gas, as well as revenues from taxonomy-aligned economic activities related to fossil gas, as required by Article 8(7)(a) of Commission Delegated Regulation (EU) 2021/2178;
- manufacture of chemical products,
- controversial weapons (anti-personnel mines, cluster ammunition, chemical weapons and biological weapons);
- cultivation and production of tobacco.

Among the information regarding the fundamental elements of its general strategy that are linked to sustainability issues or that affect them, the number of Employees broken down by geographical areas is shown below.

Number of Employees broken down by geographical area

Geographical Area	Number of Employees
Northern Italy	1,851
Central Italy	15
Southern Italy	22

The Group pays particular attention to dialogue with individuals or groups who have an interest in its activities or who could be influenced both positively and negatively, seeking to gather their expectations and concerns in order to integrate them into company strategy, and meet their needs by defining sustainability objectives. In particular, in the 2025-2027 Sustainability Plan, the Group's desire to strengthen the ESG commercial offering in terms of significant products and services (loans to businesses, loans to private individuals, direct and indirect funding) is evident, so that it is in line with the sustainability preferences of customers and can support local communities in the transition to a zero-emission economy. By way of example, due to the materiality of the sub-topic "Climate change mitigation", Banca di Asti intends to strengthen its offering of loan products and services to support local communities in the transition to a zero-emission economy, with a particular attention to production chains, through the issue of sustainable bonds (Green Bonds, Social Bonds, Sustainability Bonds or Sustainability-Linked Bonds). For more details on the objectives relating to the ESG commercial offering, please refer to section E1-4.

The Cassa di Risparmio di Asti Group conducted an in-depth analysis of its value chain, in order to identify and understand the direct and indirect business relationships that could have an impact on people and the environment. This analysis was carried out in compliance with the indications provided by the ESRs 2 standards, paragraph 42 (c), and the "Implementation Guidance Value Chain FAQ no. 4".



The value chain includes the entire range of activities, resources and relationships related to the Group's business model and the external environment in which it operates, including all the actors who, both upstream and downstream, have a direct relationship with the Group (meaning only the first tier of the value chain), taking into account the external environment in which it operates. It includes all of the actors, both upstream and downstream, who contribute to the operation of the Group. The upstream actors, such as the Suppliers, provide goods and services used in the creation of the company's products and services, while the downstream actors, such as the Customers, receive the services offered by the Group.

For the Cassa di Risparmio di Asti Group, the value chain was analysed through two main perspectives:

- **"Company operations" perspective (Upstream and Own Operations)**

This perspective focuses on commercial relations with Suppliers (upstream) and on internal business processes (own operations). The relevant Stakeholders in this section include Employees, Suppliers, Business Partners, Customers, Shareholders and Top Management. In particular, the Group analyses how internal activities and relations with suppliers can have an impact on the environment, on society and on its company operations. With regard to the analysis of the section of the Value chain relating to Suppliers (upstream), a careful and in-depth assessment of the Group's main supply partners was carried out, considering the data present in the internal databases relating to the purchases made. In this context, three particularly relevant categories of Suppliers emerged, which represent a significant component of procurement and strategic support activities:

- **Consultants:** this includes consulting service suppliers, including those related to legal activities and specialist consultancies;
- **Suppliers of general goods and services:** these include suppliers of products and services not strictly linked to the core business but necessary for ordinary operations and operational efficiency;
- **Infoprovider:** suppliers of information and technology services essential for the procurement of data and strategic information.

The identification of these categories of Suppliers made it possible to conduct a targeted and complete assessment of the upstream supply chain, confirming the absence of material impacts, risks or opportunities for the Group. Therefore, no critical issues or risk elements emerged that could compromise operational continuity or performance at the supply level. The analysis therefore excluded the need for immediate corrective or strategic interventions, having ensured that the current supply dynamics are stable and without particular vulnerabilities.

- **"Business Activities" Perspective (Downstream)**

This perspective concerns the business activities downstream of the value chain, focusing on the Group's role as a lender and investor. The main Stakeholder in this part of the value chain is the Customer, divided into two categories: retail Customer (private) and corporate company. To accurately

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

assess the section of the Value chain relating to the downstream part of the Cassa di Risparmio di Asti Group, an in-depth analysis was carried out of the databases relating to the most significant business lines, i.e. investments, loans granted to private customers (with particular attention to real estate as collateral) and loans to businesses.

For the analysis of Impact Materiality – Business, the following segments were considered:

- Retail real estate mortgages: the Bank's exposure and its distribution by EPC class of the financed real estate assets were analysed, also considering the associated residual debt;
- Loans to businesses: for the analysis of loans to businesses, the Bank's exposure to businesses was examined by analysing the sectoral distribution according to the first digit of the NACE code and taking into account the associated residual debt;
- Investment portfolio: in the analysis of investments, the investments managed and owned by the Bank were considered, with an assessment of their sector distribution based on the first digit of the NACE code, including the associated GCA.

This assessment revealed impacts, risks and opportunities that were appropriately integrated into the Double Materiality process. The Cassa di Risparmio di Asti Group is committed to developing financial solutions that meet the specific needs of each category, guaranteeing access to responsible and sustainable loans, as already detailed above.

The analysis carried out on the value chain has enabled the Group to assess, on the one hand, the risks and opportunities deriving from its activities and, on the other, the impact of its operations and services on the community and on the environment. In this way, the Group is constantly committed to ensuring responsible and transparent management of its value chain, in order to positively contribute to the well-being of people and the planet.

SBM-2 – Interests and views of stakeholders Stakeholders are all parties that have a direct relationship with the Group, such as Employees, Shareholders, Customers, Suppliers, or who can interact with its management, such as Trade Unions, Control and Supervisory Bodies, in addition to Sector Associations and Legislators. Finally, they also include all those who may be interested and indirectly involved in the Group's activities, such as communities and local authorities, information bodies, schools and universities. The process for identifying material issues involves listening to key stakeholders for the organization, together with the involvement of Top Management, in order to make the assessments expressed by the Stakeholders more consistent with the business and the reality of the Group and in order to reflect a greater prospective relevance for some issues in the assessment in consideration of regulatory developments and the main trends in the sector.

In line with the provisions of the EFRAG Guidelines, the Double Materiality analysis conducted envisaged a phase involving both internal and external stakeholders. To



this end, a questionnaire was prepared and submitted to a sample of selected Stakeholders, namely:

- Non-shareholder Customers (diversified based on type and sector);
- Shareholders;
- Strategic suppliers belonging to different sectors;
- Employees;
- Top management.

For the categories of non-shareholder Customers, Shareholders, Suppliers, Employees, Top Management, direct involvement was planned through a specific online questionnaire, aimed at collecting their opinions on the materiality of the impacts that emerged from the Double Materiality analysis along the value chain of the Cassa di Risparmio di Asti Group.

By involving Stakeholders in the Double Materiality process, the Group intended to consolidate the selection of material ESRS topics, ensuring that all relevant perspectives were adequately represented in the analysis. To this end, a questionnaire was prepared that included 36 impacts relating to the 36 ESRS sub-topics (a sub-topic relating to the E4 standard "Biodiversity and ecosystems" was integrated), through which respondents were asked to indicate if the impact under analysis was:

- Material to Business;
- Material to Company operations;
- Material to both Company operations and Business;
- Not material.

The Stakeholder engagement process consists of a continuous dialogue with individuals or groups who have an interest in the Group's activities or who could be positively or negatively influenced by them. The objective is to actively involve the main stakeholders in company decisions and actions, gathering their expectations and concerns to integrate them into the company strategy, building and maintaining transparent and collaborative relationships and ensuring the sharing of clear information regarding activities, choices and the impacts of the company.

The Group considers it very important to maintain a constant relationship with all Stakeholders, in order to build and develop relationships of trust that can affirm its credibility and responsibility towards the social context in which it operates.

Adequate involvement can in fact facilitate the achievement of the following objectives:

- increase reputation;
- allow an in-depth understanding of the environment in which the Group operates, including market developments and the identification of new strategic opportunities;
- allow learning from Stakeholders, obtaining better results and improvements in processes;

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

- inform, educate and influence stakeholders and the external environment to improve their decision-making processes and actions that have an impact on the company and society;
- build trust between the Group and its Stakeholders by including their expectations and priorities in the definition of strategic guidelines.

For these reasons, the Group has always paid particular attention to its Stakeholders through the following actions:

- constant dialogue with customers through Customer Satisfaction, institutional websites, home banking, apps, etc.;
- promotion of meetings, seminars and events;
- discussion and dialogue with investors at the Shareholders' Meetings;
- periodic training activities, company Intranet and other internal communication tools with collaborators and periodic meetings with company trade union representatives.

The main methods for involving Stakeholders are detailed below, broken down by area.

OWN WORKFORCE

The Cassa di Risparmio di Asti Group consistently pursues policies of dialogue with and listening to Employees, in order to ensure a shared understanding of needs, align strategy and overall projects, stimulate motivation and promote a positive work environment.

At Banca di Asti, the interests, opinions and rights of the workers are brought to the attention of the corporate bodies through the trade union representatives, who organize meetings within the company premises using paid leave granted by the company, up to a maximum of ten hours annually. This method allows workers on the one hand to share proposals and actively contribute to the management of work dynamics and company decisions, and on the other, thanks to the possibility of using paid leave for these activities, underlines the company's commitment to guaranteeing a participatory and democratic work environment. The meetings, coordinated by the company trade union representatives, allow the definition of a platform of requests which, once approved by the majority of the participating colleagues, is subsequently presented to the company, thus carrying out the second level bargaining.

The platform may include requests relating to various aspects, such as the method and amount of the company bonus, measures relating to supplementary health care, guarantees for occupational safety, the protection of health and hygiene conditions in the workplace and the company contribution to Supplementary Pension Plan, as envisaged by the National Collective Labour Agreement. In addition, Banca di Asti has formalized in a single "Memorandum of Understanding" a series of additional agreements to improve the conditions of personnel regarding recruitment, training, transfers, allowances, working hours, leave and economic conditions.



The interests and opinions of Group Employees are also considered during the Double Materiality analysis process through which material issues are identified annually, also taking into account the point of view of internal Stakeholders.

LOCAL COMMUNITIES

The Cassa di Risparmio di Asti Group adopts a strategy focused on listening to and valuing the opinions of the various local communities, placing people at the centre of every initiative.

Google reviews become a fundamental tool for collecting feedback not only from direct Customers, but also from all members of the community who interact with the Branches in the area. This inclusive approach allows us to have a broader view of the needs and expectations of citizens, thus promoting an open and constructive dialogue. In this context, the Cassa di Risparmio di Asti Group does not just respond to reviews, but also uses this input to improve the services offered, personalize its proposals and strengthen its bond of trust with the territory. Events and communications are designed taking into account the needs expressed by the community, creating an environment in which everyone feels listened to and valued. There is also a strong synergy and continuous collaboration with local institutions, such as schools and municipalities, in order to promote social well-being and strengthen the bond with the territory.

CONSUMERS AND END-USERS

The Group attributes the utmost importance to the management and maintenance of relationships with customers, to be pursued by promoting long-lasting and continuous relationships characterized by the principles of professionalism, transparency, trust and collaboration. In pursuit of this objective, the constant commitment to provide quality and innovative services and products is of primary importance, paying the utmost attention to respecting the needs and characteristics of individual Customers, while guaranteeing the confidentiality of personal information shared. The Group has always paid particular attention to dialogue with customers both to develop relationships of trust and to manage market needs, as well as to maintain high levels of credibility from the reputational point of view, and it periodically monitors the appreciation of and satisfaction with products and/or services provided so that the interests and opinions of consumers guide the strategy and the business model.

Communication with Customers, both Retail and Business, takes place thanks to a wide choice of assistance channels (branches, toll-free telephone number 800 998 060, email, SMS, WhatsApp, video call and screen sharing) to allow current Customers and prospects to choose the one most in line with their respective needs, while their opinions are collected with different methods of listening, all aimed at improving the quality of the services offered and responding effectively to the needs of Customers. Each method, from online reviews and management of complaints to satisfaction and privacy surveys, is aimed at collecting specific and useful information.

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

In this regard, the main methods of listening to customers are shown below.

Listening methods	Segment Customers	Description
Online survey functional to the preparation of the Double Materiality Analysis	Retail and Businesses	Survey which requires analysing the significance of different impacts on company operations and on the business, concerning people and the environment.
Specific surveys	Retail and Businesses	Collection of feedback on sustainability issues and on the degree of satisfaction with the services and products offered, such as the subscription of loans.
Reviews on various online platforms (TrustPilot, Meta, Google, etc.)	Retail and Businesses	Collection of opinions and any concerns through online reviews on public platforms, specific to each Branch present in the area.
2023-2024 Business Survey	Businesses	Collection of targeted feedback on the needs and expectations of business customers to guide the strategy and business model and develop solutions in line with their needs.
POG questionnaire	Businesses	Identification of the products and services most suited to the needs of business customers.
Happiness Index	Retail and Businesses	Customer satisfaction survey, measuring their level of happiness when specific events occur, such as an appointment at the branch and opening a checking account.
Banking Centre customer service assessment survey	Retail and Businesses	Monitoring of the degree of satisfaction of Customers to whom the assistance service offered by the Banking Centre is provided.
Listening to the needs of the Sales Network	Retail and Businesses	Collection of reports from the sales network distributed throughout the territory and the top managers (Area Managers), in direct contact with the Group's Customers.
Monitoring of complaints and the target market	Retail and Businesses	Analysis of any complaints received and continuous monitoring of the needs of the target market.
Privacy consent control	Retail and Businesses	Monitoring and control of privacy consents given by Customers both for reporting to third-party companies and for sending communications.
Customer Service and Complaints	Retail and Businesses	Information disseminated on how to send complaints (transparency documentation, website, contracts) and the possibility of submitting complaints through different methods (email or certified email, ordinary mail, registered letter, fax, delivery to a branch office, etc.), with effective management of the case by the Complaints Office in order to preserve relations with the Customer in the event that elements of dissatisfaction arise.

The Group's culture is oriented towards satisfying the needs of Customers during all phases of the contractual relationship and enhances the relationship through in-depth and systematic listening, customer satisfaction surveys and effective management of complaints. Proper management of complaints makes it possible to use the information that can be obtained from them to identify any margins for improvement in the processes adopted in the marketing of products, as well as any malfunctions of company processes and anomalous behaviour, so as to allow the adoption of corrective measures and increase the organization's ability to improve its products and services for customers. This approach responds to the needs of trust and closeness expressed by Customers.



In addition to all the methods mentioned above, an annual Stakeholder engagement exercise is carried out for the purposes of the Double Materiality analysis. For more details, please refer to section ESRS 2 IRO-1.

Listening to the needs and expectations of Stakeholders allows the Group to understand material environmental and social aspects, identify emerging trends and new strategic opportunities, assess the adequate correlation between risks and opportunities and promote synergistic integration in the strategic planning process.

In fact, thanks to both the Stakeholder engagement process aimed at the Double Materiality analysis and through the channels of continuous dialogue specifically structured for each Stakeholder, the Group takes into account the expectations of its main stakeholders in defining the corporate strategy, integrating them into the management of impacts, the assessment of risks and the creation of business opportunities in the social and environmental sphere as a response to needs expressed by the stakeholders.

With reference to the Double Materiality analysis process, the results of the Stakeholder engagement were aggregated in order to take into account the most frequent response in the votes of the parties involved. In particular, the involvement of Stakeholders had an effect on the assessment of the Company operations perspective in relation to the topics "E1 - Climate change", "S1 - Own workforce" and "G1 - Business conduct", while it affected the Business perspective in relation to the topics "S3 - Affected Communities" and "S4 - Consumers and end-users".

These results, presented together with the results of the Double Materiality analysis, are brought, through the Head of the Budget and Planning Service, to the attention of the Chief Executive Officer who, after assessment, submits them to the Risk and Sustainability Committee and proposes them to the Board of Directors for assessment and approval.

The Double Materiality analysis offers the Board of Directors, through the analysis of IROs, updated and detailed information on sustainability issues deriving from two main sources: on the one hand, the analysis of internal dynamics and of the operations of the Group's business and, on the other hand, the direct involvement of Stakeholders. This integrated double perspective makes it possible to assess not only how environmental, social and governance (ESG) issues affect the company's financial performance, but also how the company's activities impact its Stakeholders and the surrounding environment. Strategic decisions can therefore be guided by a deeper understanding of the expectations and concerns of stakeholders, thus contributing to building a more responsible and resilient business.

This connection is clearly visible in the Group's 2025-2027 Sustainability Plan, which contains objectives and actions that can be linked to the issues that emerged as material in the Double Materiality exercise. For more details on the Sustainability Plan, please refer to the sections relating to Targets within the thematic topics. For further details on how IROs interact with the strategy and business model, please refer to sections ESRS 2 GOV-2, ESRS 2 SBM-1 and ESRS 2 SBM-3.

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



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

The tables below show the impacts, risks and opportunities that emerged from the Double Materiality exercise, with an indication for each IRO of the type, time horizon and segments of the value chain affected.

Material impacts

ESRS – Sub-topic	Description of the impact	Type of impact	Impact direction	Time horizon	Value Chain
E1 – Climate Change <i>Climate change mitigation</i>	Impact on ecosystems, people and the economy due to the occurrence of extreme climate events related to greenhouse gas emissions.	Actual	Negative	Short, medium, long-term	Company operations
E1 – Climate Change <i>Climate change mitigation</i>	Exposures to companies that generate an impact on ecosystems, people and the economy due to the occurrence of extreme climate events related to greenhouse gas emissions.	Potential	Negative	Short, medium-term	Business Activities
E1 – Climate Change <i>Climate change mitigation</i>	Impact linked to loans to individuals for the purchase of properties whose energy performance has an impact on climate change.	Actual	Negative	Short, medium, long-term	Business Activities
E1 – Climate Change <i>Energy</i>	Impact related to the consumption of electricity which, fuelled for the most part by the combustion of fossil fuels, produces large quantities of greenhouse gases such as carbon dioxide, methane and nitrous oxide, which contribute to climate change and have a negative impact on the environment.	Actual	Negative	Short, medium, long-term	Company operations
S1 – Own workforce <i>Working conditions</i>	Impact of the management of socio-economic conditions and the quality of life of the company population related to the protection of Employees, respect for workers' rights (including a balance between private and professional life, adequate wages, stable employment) and the promotion of a healthy and safe working environment, in line with industry standards.	Actual	Positive	Short, medium-term	Company operations
S1 – Own workforce <i>Equal treatment and opportunities for all</i>	Impact of Employees' satisfaction and productivity in relation to the working environment, with particular reference to inclusiveness, equal opportunities, diversity and fair remuneration.	Actual	Positive	Short, medium-term	Company operations
S1 – Own workforce <i>Other work-related rights</i>	Impact of socio-economic gaps related to the failure to respect basic rights of workers, such as the use of child and forced labour, as well as human	Potential	Negative	Short, medium-term	Company operations



SUSTAINABILITY STATEMENT

GENERAL DISCLOSURES

	rights, such as respect for privacy.				
S3 – Affected communities <i>Economic, social and cultural rights of communities</i>	Exposures to companies that generate an impact on the well-being of local communities through skills development and entrepreneurship projects which make it possible to support the social and economic development of the communities.	Potential	Positive	Short, medium-term	Business Activities
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end-users</i>	Impact of the dissemination of sensitive/confidential information due to inefficient management of the security systems and privacy of Customers.	Potential	Negative	Short, medium-term	Company operations
S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Exposures to companies that generate an impact on the accessibility of products and services, also through transparent communication of their characteristics.	Potential	Positive	Short, medium-term	Business Activities
S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Impact related to accessibility to products and services, also through transparent communication of their characteristics (e.g. responsible marketing) and financial education initiatives.	Potential	Positive	Short, medium-term	Company operations
G1 – Business conduct <i>Corporate culture</i>	Impact of increasing transparency on good practices through the use of policies on good conduct and promotion of the business culture.	Actual	Positive	Short, medium-term	Company operations
G1 – Business conduct <i>Protection of whistleblowers</i>	Impact related to the creation of healthy work environments through the promotion of initiatives and communication channels that ensure the confidentiality of the personal data of those who report possible violations of the organization's regulations and guidelines.	Actual	Positive	Short, medium, long-term	Company operations
G1 – Business conduct <i>Corruption and bribery</i>	Impact on business conduct related to the absence of policies and appropriate control over corruption.	Potential	Negative	Short, medium, long-term	Company operations

Material risks

ESRS – Sub-topic	Risk drivers and potential financial impact	Time horizon	Value chain
E1 – Climate Change <i>Climate change mitigation</i>	Credit risk (transition risk) Credit risk linked to regulatory developments and accelerated and potentially disorderly macroeconomic changes related to the pursuit of the reduction of CO2 emissions, with particular reference to climate-relevant sectors.	Medium, long-term	Business activities
E1 – Climate Change <i>Energy</i>	Credit risk (transition risk) Credit risk linked to regulatory developments on energy consumption (e.g. Green Homes Directive) and/or to new	Medium, long-term	Company operations



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

	methods of energy production and consumption that reduce greenhouse gas emissions and can lead to risk situations.		
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end-users</i>	Operational risk, reputational risk Risk of any increase in costs due to penalties for failure to disclose information on products and services offered by the Bank. Increased attention by consumers to the sustainability characteristics of the financial products and services purchased.	Short, medium-term	Company operations
S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Reputational risk Risks related to a lack of offerings consistent with the wishes and needs of consumers and poor accessibility to the services offered. Increased demand and public attention for the inclusion of the most vulnerable/marginalized consumers, with a consequent increase in pressure to develop and provide products and services for them.	Short, medium-term	Company operations
G1 – Business conduct <i>Corporate culture</i>	Reputational risk Risks related to lack of transparency, precariousness of the business model and failure to comply with good governance. Inadequate or unlawful competitive market practices or corporate governance management practices by commercial Partners and Suppliers.	Medium-term	Company operations
G1 – Business conduct <i>Protection of whistleblowers</i>	Reputational risk Risk of non-compliance with regulations that establish correct and safe channels and methods of communication, which can lead to sanctions. There is a qualitative assessment of litigation risks related to incorrect whistleblowing practices. Sectors with lower adoption of whistleblowing regulations are more exposed to litigation risks.	Short, medium-term	Company operations
G1 – Business conduct <i>Corruption and bribery</i>	Reputational risk Risk of increased costs linked to sanctions and legal actions caused by incorrect monitoring of issues related to corruption. Non-compliance with current legislation and unlawful conduct in areas such as the reuse of profits deriving from illegal activities, episodes of extortion, anti-competitive behaviours, etc.	Short, medium-term	Company operations

Material opportunities

ESRS – Sub-topic	Description of opportunities	Time horizon	Value chain
E1 – Climate Change <i>Climate change adaptation</i>	Promotion of the offering of insurance products for protection against climate and environmental risks (e.g. Budget Law).	Medium-term	Business activities
E1 – Climate Change <i>Climate change mitigation</i>	Strengthening of the offering of green loan products, including, for example, green real estate mortgages. The growth of the green mortgage market is driven by the evolving legislation on Green Homes and the growing demand from retail consumers interested in the purchase/renovation of high energy-efficiency homes	Medium-term	Business activities
ESRS S3 – Affected communities <i>Economic, social and cultural rights of communities</i>	Promotion and support of communities and companies of all size through subsidized forms of financing.	Medium-term	Business activities
ESRS S3 – Affected communities <i>Economic, social and cultural rights of communities</i>	Strengthening of the Bank's positioning in the area through the organization of financial education and sustainability programmes.	Short, medium-term	Business activities

The Cassa di Risparmio di Asti Group has identified the risks and opportunities that could significantly influence its development, asset-based and financial situation, economic result and cash flows, in the short, medium and long term. Taking into account the potential scale of the financial effects deriving from the various risks and



opportunities, and the probability that these may occur, the main risks and opportunities to which the Group is exposed have been identified, as detailed below:

Material Risks:

- Climate Change Mitigation and Adaptation: Credit risk linked to regulatory developments and accelerated and potentially disorganized macroeconomic changes related to the reduction of CO₂ emissions.
- Energy: Credit risk linked to regulatory developments on energy consumption and new methods of energy production and consumption. The portfolio of residential mortgages with collateral properties in energy classes from D to G presents a risk of future depreciation.
- Consumers and End-Users: Operational and reputational risk linked to sanctions for failure to disclose information on products and services, as well as possible risks linked to a lack of offering consistent with the wishes and needs of consumers, and poor accessibility to the services offered.
- Business Conduct: Reputational risk linked to the increase in costs deriving from sanctions and legal actions, caused by incorrect monitoring of issues related to corruption and the composition of the company's governance, which, by its nature (the presence of banking foundations with publicly appointed members), may generate reputational problems as a result of the actions taken. Reputational risk deriving from any non-compliance with regulations that establish correct and safe communication channels and methods, which can lead to sanctions.

Material Opportunities:

- Climate Change Mitigation and Adaptation: Strengthening the offering of green loan products, such as green real estate mortgages, driven by the legislation on Green Homes and the growing demand of consumers for high energy-efficiency homes. Promotion of insurance products for protection against climate and environmental risks.
- Affected communities: Strengthening of the Bank's positioning through financial education and sustainability programmes. Promotion and support of communities and companies of all size through subsidized forms of financing.
- Own workforce: Reduction of costs related to the management of human resources, thanks to an improvement in the retention rate, a reduction in turnover and a stronger attraction of talents. The well-being of Employees, the implementation of inclusion programmes and attention to the needs of Employees contribute to strengthening human capital.

In response to these risks and opportunities, the Group faces a credit risk linked to regulatory developments and accelerated macroeconomic changes, with particular reference to climate-relevant sectors. In addition, prolonged exposure to chronic physical risks could interrupt operational continuity and negatively affect customers' financial performance, increasing the risk of default.

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

The supply chain is also affected by regulations and economic changes, with potential disruptions and additional costs. The Cassa di Risparmio di Asti Group has already begun to integrate credit risk and climate regulation considerations into its strategy and decision-making processes. Currently, the financial effects on the income statement relating to climate change can be estimated in terms of higher value adjustments on loans for approximately EUR 5 million. For more details, please refer to ESRS E1 – IRO 1.

Future regulations and economic changes are expected to continue to influence the business model, requiring continuous adjustments to maintain financial sustainability. The value chain will need to be further adapted to respond to new regulations and evolving economic conditions, while the company strategy will continue to evolve to address transition risks and exploit opportunities related to climate change mitigation and adaptation.

In the short term, the asset-based and financial situation will be influenced by the increase in operating expenses, deriving from the implementation of new regulations and sustainable technologies, and by the potential depreciation of collateral properties with low energy classes. In the medium term, operating expenses are expected to stabilize thanks to the adoption of more efficient and sustainable technologies, with an improvement in the quality of the mortgage portfolio thanks to investments in high energy-efficiency properties. In the long term, a strengthening of the asset-based position is expected thanks to greater resilience to climate risks and a reduction in credit risk.

Consequently, in the short term, the economic result will be influenced by possible reductions in profit margins due to the initial costs of adapting to new regulations and technologies, but in the medium and long term, greater operational efficiency and better management of credit risk are expected. Finally, an increase in demand for sustainable financial products will lead to an increase in profits.

The Group is implementing various strategies to manage credit risk linked to climate regulations, in particular by integrating physical and transition risk elements in the credit decision process. This approach makes it possible to limit the disbursement of credit to sectors and Customers with a high climate risk, ensuring that the portfolio remains resilient in the face of climate change. At the same time, a gradual restructuring of the residential mortgage portfolio is envisaged to obtain a real estate portfolio as collateral with better energy classes and lower risk of devaluation in the medium-long term.

In the medium and long term, further changes will be made to the corporate strategy to respond to regulatory developments and changing economic conditions. In addition, new sustainable financial products and services will be developed to meet consumers' needs and improve competitiveness. Financial education and sustainability programmes are also planned to raise awareness of ESG issues among customers.

During 2024, the Group launched a process of collecting and analysing data relating to ESG risks and opportunities, in order to ensure transparent reporting in compliance with European regulations.



In this context, the resilience of the Group's strategy and business model is manifested in its ability to manage the risks and material impacts identified, as well as to capitalize on the opportunities that have emerged. This resilience is guaranteed by the consistency between the analyses carried out as part of the Double Materiality analysis, the involvement of Stakeholders, the 2025-2027 Sustainability Plan and the assessments on the effects of ESG risk factors on the Group's traditional risks. For more information on the resilience of the business model in relation to climate change, please refer to section ESRS E1 – SBM-3, with particular attention to the results deriving from the analysis of the scenarios.

Impacts, risks and opportunities management

Double Materiality analysis, as established by the CSRD Directive and the ESRSs, represents the basis for the identification of the material information to be included in the Sustainability Statement. This process is divided into two main approaches:

- **Impact Materiality:** based on an "inside-out" approach, this assesses the effects that the company's activities have on people and the environment, taking into consideration time horizons ranging from the short to the long term;
- **Financial Materiality:** adopting an "outside-in" approach, the emphasis is initially placed on identifying risks and opportunities arising from sustainability issues. This is followed by an analysis of how these factors can influence the Group, affecting development, the economic-financial situation, cash flows, access to loans and the cost of capital in the short, medium and long term.

Following the indications of the Implementation Guidance IG1, the Group has structured its Double Materiality process according to four main phases:

- understanding of the context and definition of the scope of analysis and the Value chain;
- identification of Impacts, Risks and Opportunities (IROs);
- assessment of IROs;
- determination of material matters.

The Cassa di Risparmio di Asti Group has drawn up a long list of impacts defined up to the ESRS sub-topic level. The long list of impacts is composed, shared and validated with the functions deemed relevant on the basis of the relevant ESRS topics.

After the definition of the long list of impacts, the latter were assessed in order to define a restricted list containing only the material impacts. The impact assessment methodology was structured separately between the Operations Perspective and the Business Perspective, in order to highlight how the analysis of banking operations, which includes the assessment of market strategies, services offered and interactions with the Customers, provides a more complete view of the Group's ability to create value, as well as to identify possible negative impacts in its commercial relationships. For more information on the Group's Value chain please refer to section ESRS 2 SBM-1.

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

GENERAL
DISCLOSURESSUSTAINABILITY
STATEMENT

In line with the requirements of the EFRAG Guidelines, the Double Materiality analysis conducted envisaged a phase of involvement of internal and external Stakeholders. In particular, in the context of the assessment of impacts, the "Stakeholder Perspective" was also considered, thanks to the Stakeholder Engagement process.

For the categories of non-shareholder Customers, Shareholders, Suppliers, Employees, Top Management, direct involvement was activated through a specific online questionnaire, aimed at collecting their opinions on the materiality of the impacts that emerged from the Double Materiality analysis along the value chain of the Cassa di Risparmio di Asti Group.

By involving Stakeholders in the Double Materiality process, the Group intended to consolidate the selection of material ESRS topics, ensuring that all relevant perspectives were adequately represented in the analysis. To this end, a questionnaire was prepared that included 36 impacts relating to the 36 ESRS sub-topics (a sub-topic relating to the E4 standard "Biodiversity and ecosystems" was merged), through which respondents were asked to indicate if the impact under analysis was:

- Material to Business;
- Material to Company operations;
- Material to both Company operations and Business;
- Not material.

After identifying the impacts generated by the Group, an assessment was carried out to select the material ones. The assessment methodology differs between the Operations Perspective and the Business Perspective, and is based on the following dimensions of the Directive:

- Scale: severity of the negative impact or benefit of the positive impact for people or the environment;
- Scope: extension of the impact, both geographical (environmental) and in terms of people involved;
- Irremediability: possibility of mitigating or restoring the environment or the people affected to their previous state, only for negative impacts;
- Likelihood: likelihood of an impact occurring, with the severity prevailing over the likelihood in the event of potential negative impacts on human rights.

The topic relating to ESRS S1 (Own workforce) was limited to the Operations Perspective, as it is not applicable to the Business Perspective.

The overall score for each impact of the Operations Perspective and the Business Perspective was calculated as follows:

- Positive impact: $\text{AVERAGE (Scale + Scope)} * \text{Likelihood}$;
- Negative impact: $\text{AVERAGE (Scale + Scope + Irremediability)} * \text{Likelihood}$.

In order to allow the correct assessment of the materiality of each impact, the scales of scores obtained through the analysis were re-proportioned in intervals from 1 to 5. For each perspective/analysis, the maximum and minimum scores achieved were considered in order to measure the width of the range.



The assessment was conducted using expert-based methods, considering the nature of the banking sector and benchmark analyses. Subsequently, the intervals were defined and the values were distributed in the established bands.

The final scores, weighted considering the results of the Stakeholder engagement and the assessments of the responsible functions, led to the identification of the most frequently selected response.

Once the final scores for each perspective were defined, the overall Impact Materiality score was determined by taking the highest value among those of the Operating Perspective and of the business lines of the Business Activities Perspective. Subsequently, the scores associated with impacts, risks and opportunities were aggregated, determining the maximum value for each sub-theme.

In order to ensure that the reporting included the most significant issues for the Group and its value chain, a minimum threshold of 3.5 was adopted on a scale from 1 to 5 for both impact materiality and financial materiality.

The identification of ESG risks in the Cassa di Risparmio di Asti Group began by analysing the existing controls, in order to understand the ESG risk drivers in line with the business model. The analysis focused on the prudential scope of the Group, including risk categories such as credit, operational, reputational, market, liquidity and strategic risk. On this basis, a long list of risks was developed, detailed down to the sub-topic level.

At the same time, the identification of ESG opportunities was carried out on the one hand by examining the strategic guidelines and objectives of the Cassa di Risparmio di Asti Group's Sustainability Plan, and on the other by considering external aspects, such as the growing interest of the market for sustainable financial products and regulatory developments. The analysis also took into consideration what was already reported in the Group's 2023 NFS, relating the opportunities identified with the issues of the ESRs. For each opportunity, the time horizon was defined, distinguishing between short, medium and long term. Also in this phase, the Risk Management function was involved to validate the opportunities identified, adopting an approach similar to that used for the identification of risks.

To assess the risks and opportunities to which the Cassa di Risparmio di Asti Group is exposed in the short, medium and long term, an analysis was conducted on the impact of ESG risks on the various prudential risk categories, including credit, operational, reputational, liquidity, market and strategic risk. This analysis did not envisage a specific prioritization of the risks linked to sustainability, but considered the risk factors from an overall perspective.

A score, calculated as the product of the scores associated with the following dimensions, was associated with each risk for its related assessment:

- magnitude: measures the scale of the financial effects deriving from the manifestation of a given risk or opportunity, assessed in the short, medium and long term;



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

- likelihood: indicates the likelihood of occurrence of risks and opportunities. It is important to underline that, for the purposes of the assessment of Financial Materiality, the ESRSs require that the likelihood of occurrence linked to the financial risk be assessed gross of the various controls introduced by the Group. Therefore, the intrinsic risk (so-called gross risk) and not the net risk is significant for the Financial Materiality analysis.

In order to allow the correct assessment of the materiality of each risk and opportunity, the score scales obtained through the analysis were re-proportioned in intervals from 1 to 5.

It should be noted that for each perspective/analysis the maximum and minimum scores achieved were considered, in order to measure the width of the range. Subsequently, the intervals were defined and the values were distributed in the defined bands.

The decision-making and control process in relation to the Double Materiality process is divided into several interconnected phases. Initially, a context analysis is carried out to identify significant impacts, risks and opportunities, considering both internal and external sources, such as company reports and sector indicators. Subsequently, the Responsible Function verifies that the list of Impacts, Risks and Opportunities (IROs) to be assessed is consistent with the sources used, ensuring that they are relevant for the internal and external dimensions. In the assessment of Double Materiality, the same Structure verifies that the views of the Stakeholders are considered, ensuring that their opinions are integrated into the decision-making process. This approach ensures that the process is complete, accurate and aligned with the expectations of all parties involved. The approval of the Double Materiality is the responsibility of the Board of Directors. For further details, please refer to section ESRS 2 GOV-1.

For more information on internal control procedures, please refer to section ESRS 2 GOV-5 relating to the Internal Control System.

The Group has developed a method to assess the potential scale and likelihood that the ESG risk drivers may generate, considering the Bank's main prudential risk categories: credit risk, operational risk, reputational risk, market risk, liquidity risk and strategic risk.

An "ESG Risk map" was therefore created to associate each prudential risk category with a potential level of scale (significant, potentially significant, negligible) generated by the ESG risk drivers considered. For the analysis, the ESG drivers were associated with the ESG thematic standards introduced by the regulations.

The ESG Risk map was defined, supplemented and modified on the basis of:

- assessments already initiated by the Group on sustainability risks;
- characteristics of the Group's business;
- input from the Risk Management function;
- external inputs such as reports and reference studies.



The assessment is based on a qualitative definition of the level of financial significance of each ESG risk driver, supported, where possible, by data and documentary evidence.

For the purposes of identifying opportunities, an analysis was carried out aimed at enhancing the Group's strategic planning, assessing the growing interest of the markets in sustainable financial products and considering the regulatory evolution underway.

Similar to the risk assessment, the Group has adopted a qualitative approach for the definition of the scores relating to magnitude and likelihood. In addition, each opportunity was associated with a specific ESRS, thus ensuring alignment with current regulations and greater transparency in reporting.

This process made it possible to systematically identify and assess opportunities, ensuring their consistency with the Group's overall strategy, with Stakeholders' expectations and with the needs of the market.

The assessments related to the Double Materiality process involved the use of internal Group archives containing the data of the real estate portfolio, the portfolio of receivables from companies and investments.

2024 marks the beginning of reporting according to the CSRD, which requires the adoption of the Double Materiality process. Therefore, it is not possible to compare this process with that adopted in the previous year.

Currently, no further changes are planned to the process; however, the Group reserves the right to align itself with market normal practice that may emerge in future years.

A Double Materiality exercise will be carried out annually, with which the results of the analysis carried out the previous year will be reviewed in order to identify the material topics subject to future reporting.

Impacts, risks and opportunities related to business conduct

The Cassa di Risparmio di Asti Group is committed to maintaining high standards of ethical and social responsibility, recognizing the importance of building relationships based on trust and transparency. The adoption of responsible practices not only contributes to good business conduct but also strengthens the reputation in the market and promotes a positive working environment for Employees. Responsibility along the value chain implies close collaboration with all the players involved, such as suppliers, commercial partners and financed companies. The Group expects all these entities to adhere to ethical and regulatory principles, thus contributing to a healthy and responsible financial ecosystem. To ensure compliance with regulations and good practices, the Cassa di Risparmio di Asti Group promotes continuous training and raises the awareness of all those involved. In this way, a corporate culture oriented towards responsibility and integrity is created, essential for the long-term success of the company and for the well-being of the community in which it operates.

In the Double Materiality assessment, the impacts, risks and opportunities relating to the corporate culture, the protection of whistleblowers and corruption and bribery were identified as material, in line with the business conducted by the Group, which



appears to be already adequately regulated in all aspects relating to the corporate culture. On the other hand, the impacts, risks and opportunities related to the management of relations with Suppliers, and the issues of lobbying and animal welfare were not material. The monitoring of the issues that emerged from the Double Materiality analysis according to the provisions of the Code of Ethics and the 231/2001 Model highlights the Group's commitment to guaranteeing responsible and sustainable conduct.

Climate-related impacts, risks and opportunities

The Group conducted a detailed analysis of the stress scenarios, as part of the ICAAP 2023, to assess the impact of climate risks on its credit risk metrics, in particular the Probability of Default (PD) and the Loss Given Default (LGD).

The quantification of climate and environmental risks, to be understood as an incremental delta of credit risk, assessed prospectively for the two-year period 2024-2025, was done using the advanced AIRB method for the determination of pillar 1 credit risks. The projection in the two-year period 2024-2025 was carried out with a view to climate stress on the AIRB internal risk metrics reported below:

- PD: application of a shift on the central PD values of the rating classes. This incremental shift in Probability of Default, provided by the Cerved infoprovder, derives from a set of proprietary statistical models that consider:
 - the effect of the reference NGFS scenario (Orderly or Hot House);
 - the impact of the climate transition on the economic and financial variables and on the FSI (Financial Sustainability Index) debt sustainability indicator of counterparties;
- LGD: estimate of the devaluation of the value of properties used as collateral deriving from the physical risk to which the property is exposed, obtained from the Cerved infoprovder. The new value of the property thus determines a change in the prospective loan to value (LTV) of the credit exposure, a variable considered by the LGD AIRB model, consequently influencing the LGD value associated with the individual relationship.

These scenarios require the authorities to promptly adopt active policies to support the transition and for companies to invest in reducing emissions in line with the objectives of the Paris agreements, to eliminate net emissions by 2050.

In the orderly scenario, the climate risk associated with credit exposures can be quantified in terms of an increase in risk-weighted assets of approximately EUR 58 million in 2024 and approximately EUR 59 million in 2025, with a significant decrease in the shortfall component of approximately EUR 3.8 million in 2024 and approximately EUR 3.5 million in 2025.

In the hot house scenario, the climate risk associated with credit exposures can be quantified in terms of an increase in risk-weighted assets of approximately EUR 26 million in 2024 and approximately EUR 20 million in 2025, with a significant decrease in the shortfall component of approximately EUR 3 million in 2024 and 2025.



SUSTAINABILITY STATEMENT

GENERAL DISCLOSURES

In terms of direct impact on the income statement, the quantification of climate risk can be estimated in terms of higher value adjustments on loans for approximately EUR 5 million.

In addition, the climate and environmental risk component was also introduced in the prospective idiosyncratic stress scenario, a scenario that assumes the joint occurrence of a series of independent events. For the ESG area, a geographically localized material atmospheric event was considered, with damage to the properties guaranteeing the Bank's loans and an impact for some specific sectors that are more sensitive to the transition risk in the event of a significant climate change. In summary, the following was calculated:

- a total loss of value of the collateral properties located in the provinces of Genoa, Savona and Imperia due to a sudden extreme weather event. Liguria is an area with a high physical risk and is material for Banca di Asti;
- a sudden and unexpected transition to non-performing of counterparties that present a "high" or "very high" transition risk (in Banca di Asti's credit portfolio, exposures with "high" and "very high" transition risk account for a total of 14%, and 58% of this is represented by exposures to the agricultural sector) dedicated to the cultivation of cereals, rice and grapes which, based on the internal rating assigned to them, were in the medium-high to high risk range as at 31 December 2023.

The results of the stress analysis indicated that, despite the assumed increase in PD and LGD, the overall exposure to climate risks remains limited. This is due to the low materiality of high climate risk sectors on the overall portfolio. The assessment confirmed that the Bank is not exposed to material climate risks that could compromise financial stability in the medium/long term. Climate risks will be monitored continuously and risk management strategies will be adapted to ensure the resilience of the business model.

Table of contents

ESRS – Sub-topic	Disclosure requirement	Pages
GENERAL DISCLOSURES		
Basis for preparation		
ESRS 2 – General disclosures	BP-1 General basis for preparation of sustainability statements	98
ESRS 2 – General disclosures	BP-2 Disclosure in relation to specific circumstances	99
Governance		
ESRS 2 – General disclosures	GOV-1 The role of the administrative, management and supervisory bodies	101
ESRS 2 – General disclosures	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	110
ESRS 2 – General disclosures	GOV-3 – Integration of sustainability-related performance in incentive schemes	111
ESRS 2 – General disclosures	GOV-4 – Statement on due diligence	113
ESRS 2 – General disclosures	GOV-5 – Risk management and internal controls over sustainability reporting	116

IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

	Strategy	
ESRS 2 – General disclosures	SBM-1 – Strategy, business model and value chain	118
ESRS 2 – General disclosures	SBM-2 – Interests and views of stakeholders	126
ESRS 2 – General disclosures	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	131
	Impacts, risks and opportunities management	
ESRS 2 – General disclosures	IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	137
ESRS 2 – General disclosures	IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	143
ESRS 2 – General disclosures	MDR-P Policies adopted to manage material sustainability matters	150
	ENVIRONMENTAL INFORMATION	
	Strategy	
ESRS E1 – Climate Change	E1-1 – Transition plan for climate change mitigation	232
ESRS E1 – Climate Change	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	232
	Impacts, risks and opportunities management	
ESRS E1 – Climate Change	IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	233
ESRS E1 – Climate Change	E1-2 – Policies related to climate change mitigation and adaptation	238
ESRS E1 – Climate Change	E1-3 – Actions and resources in relation to climate change policies	239
	Metrics and targets	
ESRS E1 – Climate Change	E1-4 – Targets related to climate change mitigation and adaptation	240
ESRS E1 – Climate Change	E1-5 – Energy consumption and mix	242
ESRS E1 – Climate Change	E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	244
ESRS E1 – Climate Change	E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	251
ESRS E1 – Climate Change	E1-8 – Internal carbon pricing	251
	SOCIAL INFORMATION	
	Strategy	
ESRS S1 – Own workforce	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	252
	Impacts, risks and opportunities management	
ESRS S1 – Own workforce	S1-1 – Policies related to own workforce	254
ESRS S1 – Own workforce	S1-2 – Processes for engaging with own workers and workers' representatives about impacts	260
ESRS S1 – Own workforce	S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns	261
ESRS S1 – Own workforce	S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	264
	Metrics and targets	
ESRS S1 – Own workforce	S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	268
ESRS S1 – Own workforce	S1-6 – Characteristics of the undertaking's employees	269
ESRS S1 – Own workforce	S1-7 – Characteristics of non-employee workers in the undertaking's own workforce	270
ESRS S1 – Own workforce	S1-8 – Collective bargaining coverage and social dialogue	271
ESRS S1 – Own workforce	S1-9 – Diversity metrics	271
ESRS S1 – Own workforce	S1-10 – Adequate wages	272



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

ESRS S1 – Own workforce	S1-11 – Social protection	272
ESRS S1 – Own workforce	S1-12 – Persons with disabilities	272
ESRS S1 – Own workforce	S1-13 – Training and skills development metrics	272
ESRS S1 – Own workforce	S1-14 – Health and safety metrics	273
ESRS S1 – Own workforce	S1-15 – Work-life balance metrics	273
ESRS S1 – Own workforce	S1-16 – Compensation metrics (pay gap and total compensation)	274
ESRS S1 – Own workforce	S1-17 – Incidents, complaints and severe human rights impacts	274
Strategy		
ESRS S3 – Affected communities	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	275
Impacts, risks and opportunities management		
ESRS S3 – Affected communities	S3-1 – Policies related to affected communities	276
ESRS S3 – Affected communities	S3-2 – Processes for engaging with affected communities about impacts	277
ESRS S3 – Affected communities	S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns	278
ESRS S3 – Affected communities	S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	279
Metrics and targets		
ESRS S3 – Affected communities	S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	283
Strategy		
ESRS S4 – Consumers and end-users	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	285
Impacts, risks and opportunities management		
ESRS S4 – Consumers and end-users	S4-1 – Policies related to consumers and end-users	288
ESRS S4 – Consumers and end-users	S4-2 – Processes for engaging with consumers and end-users about impacts	295
ESRS S4 – Consumers and end-users	S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	301
ESRS S4 – Consumers and end-users	S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	309
Metrics and targets		
ESRS S4 – Consumers and end-users	S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	319
GOVERNANCE INFORMATION		
Impacts, risks and opportunities management		
ESRS G1 – Business conduct	G1-1 – Corporate culture and business conduct policies	321
ESRS G1 – Business conduct	G1-3 – Prevention and detection of corruption and bribery	328
Metrics and targets		
ESRS G1 – Business conduct	G1-4 – Confirmed incidents of corruption or bribery	331
ESRS G1 – Business conduct	MDR-A - MDR-T – Actions and targets relating to business conduct	331



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

Data points deriving from other EU legislative acts in line with Appendix B

Disclosure requirement and related data point	Reference to the legislation	Result of the materiality assessment and reference in the text
<i>ESRS 2 GOV-1 21, d)</i>	SFDR, Annex I, table 1, indicator no. 13 Commission Delegated Regulation (EU) 2020/1816 (5), Annex II	GOV-1 - The role of the administrative, management and supervisory bodies
<i>ESRS 2 GOV-1 21, e)</i>	Commission Delegated Regulation (EU) 2020/1816, Annex II	GOV-1 - The role of the administrative, management and supervisory bodies
<i>ESRS 2 GOV-4 30</i>	SFDR, Annex I, table 3, indicator no. 10	GOV 4 - Statement on due diligence
<i>ESRS 2 SBM-1 40 d) i.</i>	SFDR, Annex I, table 1, indicator no. 4 Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk Commission Delegated Regulation (EU) 2020/1816, Annex II	SBM-1 – Strategy, business model and value chain
<i>ESRS 2 SBM-1 40 d) ii.</i>	SFDR, Annex I, table 2, indicator no. 9 Commission Delegated Regulation (EU) 2020/1816, Annex II	SBM-1 – Strategy, business model and value chain
<i>ESRS 2 SBM-1 40 d) iii.</i>	SFDR, Annex I, table 1, indicator no. 14 Article 12, paragraph 1, of Delegated Regulation (EU) 2020/1818 (7) and Annex II of Delegated Regulation (EU) 2020/1816	SBM-1 – Strategy, business model and value chain
<i>ESRS 2 SBM-1 40 d) iv.</i>	Article 12, paragraph 1, of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816	SBM-1 – Strategy, business model and value chain
<i>ESRS E1-1 14</i>	Article 2, paragraph 1, of Regulation (EU) 2021/1119	Not material
<i>ESRS E1-1 16 g)</i>	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity Article 12, paragraph 1, letters d) to g) and paragraph 2 of Delegated Regulation (EU) 2020/1818	Not material
<i>ESRS E1-4 34</i>	SFDR, Annex I, table 2, indicator no. 4 Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics Article 6 of Delegated Regulation (EU) 2020/1818	Not material



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

ESRS E1-5 38	SFDR, Annex I, table 1, indicator no. 5 and Annex I, table 2, indicator no. 5	E1-5 – Energy consumption and mix
ESRS E1-5 37	SFDR, Annex I, table 1, indicator no. 6	E1-5 – Energy consumption and mix
ESRS E1-5 40-43	SFDR, Annex I, table 1, indicator no. 6	E1-5 – Energy consumption and mix
ESRS E1-6 44	SFDR, Annex I, table 1, indicator no. 1 and 2 Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity Article 5, paragraph 1, Article 6 and Article 8, paragraph 1 of Delegated Regulation (EU) 2020/1818	Not material
ESRS E1-6 53-55	SFDR, Annex I, table 1, indicator no. 3 Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics Article 8, paragraph 1, of Delegated Regulation (EU) 2020/1818	Not material
ESRS E1-7 56	Article 2, paragraph 1, of Regulation (EU) 2021/1119	Not material
ESRS E1-9 66	Annex II of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816 Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk	Not material
ESRS E1-9 67	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book – Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral	Not material
ESRS E1-9 69	Annex II of Delegated Regulation (EU) 2020/1818	Not material
ESRS E2-4 28	SFDR, Annex I, table 1, indicator no. 8, Annex I, table 2, indicator no. 2, Annex I, table 2, indicator no. 1, Annex I, table 2, indicator no. 3	Not material
ESRS E3-1 9	SFDR, Annex I, table 2, indicator no. 7	Not material
ESRS E3-1 13	SFDR, Annex I, table 2, indicator no. 8	Not material
ESRS E3-1 14	SFDR, Annex I, table 2, indicator no. 12	Not material
ESRS E3-4 28 c)	SFDR, Annex I, table 2, indicator no. 6.2	Not material
ESRS E3-4 29	SFDR, Annex I, table 2, indicator no. 6.1	Not material
ESRS E4 IRO-1 16	SFDR, Annex I, table 2, indicator no. 10, Annex I, table 2, indicator no. 14	Not material



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

ESRS E4-2 24	SFDR, Annex I, table 2, indicator no. 11, Annex I, table 2, indicator no. 12, Annex I, table 2, indicator no. 15	Not material
ESRS E5-5 37 (d)	SFDR, Annex I, table 2, indicator no. 13	Not material
ESRS E5-5 39	SFDR, Annex I, table 1, indicator no. 9	Not material
ESRS S1 SBM-3 14	SFDR, Annex I, table 3, indicator no. 12, Annex I, table 3, indicator no. 13	S1 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS S1-1 20	SFDR, Annex I, table 3, indicator no. 9, Annex I, table 1, indicator no. 11	S1-1 - Policies related to own workforce
ESRS S1-1 21	Commission Delegated Regulation (EU) 2020/1816, Annex II	S1-1 - Policies related to own workforce
ESRS S1-1 22	SFDR, Annex I, table 3, indicator no. 11	S1-1 - Policies related to own workforce
ESRS S1-1 23	SFDR, Annex I, table 3, indicator no. 1	S1-1 - Policies related to own workforce
ESRS S1-3 32 (c)	SFDR, Annex I, table 3, indicator no. 5	S1-3 - Processes to remediate negative impacts and channels for own workers to raise concerns
ESRS S1-14 88	SFDR, Annex I, table 3, indicator no. 2, Annex I, table 3, indicator no. 3 Commission Delegated Regulation (EU) 2020/1816, Annex II	S1-14 – Health and safety metrics
ESRS S1-16 97	SFDR, Annex I, table 1, indicator no. 12, Annex I, table 3, indicator no. 8 Commission Delegated Regulation (EU) 2020/1816, Annex II	S1-16 – Compensation metrics (pay gap and total compensation)
ESRS S1-17 103	SFDR, Annex I, table 3, indicator no. 7 Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1, of Delegated Regulation (EU) 2020/1818	S1-17 – Incidents, complaints and severe human rights impacts
ESRS S1-17 104	SFDR, Annex I, table 1, indicator no. 10, Annex I, table 3, indicator no. 14	S1-17 – Incidents, complaints and severe human rights impacts
ESRS S2 SBM-3 11 (b)	SFDR, Annex I, table 3, indicator no. 12 and 13	Not material
ESRS S2-1 17	SFDR, Annex I, table 3, indicator no. 9, Annex I, table 1, indicator no. 11	Not material
ESRS S2-1 18	SFDR, Annex I, table 3, indicator no. 11 and 4	Not material



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

ESRS S2-1 19	SFDR, Annex I, table 1, indicator no. 10 Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1, of Delegated Regulation (EU) 2020/1818 Commission Delegated Regulation (EU) 2020/1816, Annex II	Not material
ESRS S2-4 36	SFDR, Annex I, table 3, indicator no. 14	Not material
ESRS S3-1 16	SFDR, Annex I, table 3, indicator no. 9, Annex I, table 1, indicator no. 11	S3-1 – Policies related to affected communities
ESRS S3-1 17	SFDR, Annex I, table 1, indicator no. 10 Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1, of Delegated Regulation (EU) 2020/1818	S3-1 – Policies related to affected communities
ESRS S3-4 36	SFDR, Annex I, table 3, indicator no. 14	Not material
ESRS S4-1 16	SFDR, Annex I, table 3, indicator no. 9, Annex I, table 1, indicator no. 11	S4-1 – Policies related to consumers and end-users
ESRS S4-1 17	SFDR, Annex I, table 1, indicator no. 10 Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1, of Delegated Regulation (EU) 2020/1818	S4-1 – Policies related to consumers and end-users
ESRS S4-4 35	SFDR, Annex I, table 3, indicator no. 14	S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
ESRS G1-1 10	SFDR, Annex I, table 3, indicator no. 14, Annex I, table 3, indicator no. 15, Annex I, table 3, indicator no. 6,	G1-1 - Corporate culture and business conduct policies
ESRS G1-4 24	SFDR, Annex I, table 3, indicator no. 17, Annex I, table 3, indicator no. 16 Annex II of Delegated Regulation (EU) 2020/1816	Not material

On the basis of the results of the Double Materiality process, it should be noted that the topics "E2 - Pollution", "E3 - Water and marine resources", "E4 - Biodiversity and ecosystems", "E5 - Resource use and circular economy" and "S2 - Workers in the value chain" were not material as detailed below.



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

Topics "E2 - Pollution", "E3 - Water and marine resources", "E4 - Biodiversity and ecosystems", "E5 - Resource use and circular economy"

The topics of pollution, water resources, biodiversity and the circular economy do not have a material impact on the Group's daily operations. Its main activities do not involve a material consumption of water, except for hygienic-sanitary needs, with limited implications, nor complex waste management, just as its operations do not focus on the management of natural resources or industrial processes. The analysis of the impacts from a company perspective, together with the assessment of risks and opportunities, did not reveal an exposure of the portfolio such as to make these issues material factors.

Topic "S2 - Workers in the value chain"

The Cassa di Risparmio di Asti Group, operating mainly in Italy and with a simple organizational structure, does not consider issues related to working conditions in its value chain to be material. Italian regulations and the operating environment reduce risks related to issues such as secure employment, working hours, adequate wages, health and safety and social dialogue. Similarly, the issue of equal treatment and opportunities, which includes gender equality, equal pay, inclusion of people with disabilities and diversity is not considered material, thanks to the simple structure of the Group and the regulatory context that limits the risks of discrimination. Also regarding work-related rights, such as child labour, forced labour and access to housing and sanitation, the Group does not encounter problems, as the value chain is not complex and Italian laws adequately protect workers. Although the Group considers social criteria in the selection of Suppliers, the impact on working conditions and equality is limited by the marginal visibility and influence on these issues.

The Cassa di Risparmio di Asti Group has determined the material information to be disclosed on the basis of the results of the Double Materiality analysis, considering both its dimensions, or rather on one hand, impacts on the environment and people (impact materiality) and on the other hand the risks and opportunities deriving from ESG factors (financial materiality).

<p>Minimum Disclosure Requirement - Policies MDR-P – Policies adopted to manage material sustainability matters</p>	<p>The Policies adopted for each sustainability issue identified as material are put in place to prevent, mitigate and remediate actual and potential impacts, address risks and pursue opportunities.</p> <p>The Top Management is responsible for their enforcement and implementation, ensuring that the objectives included therein are actively pursued. The Board of Directors, which performs a supervisory role and is responsible for their approval, ensures that they are in line with the company's mission and strategy.</p> <p>The Policies described therein, with the exception of the Policies on Diversity, Equity and Inclusion, which apply only to Banca di Asti, are addressed to all Group Companies and are effective for each Company starting from the date of approval or implementation by the respective Boards of Directors. The Parent Company sends the document to the subsidiaries, which transpose it as an integral part of their corporate regulations.</p>
--	--



SUSTAINABILITY STATEMENT

GENERAL DISCLOSURES

For information on the IROs addressed by each policy, please refer to each topic-specific section.

The table below provides for each policy a description of the main targets and contents, and the scope in terms of the value chain and stakeholders involved, references to the channels through which the Group makes them available to stakeholders, and reference to the thematic sections for further details.

Policies	Targets	Scope	Channels	Reference
Group Sustainability Policies	<ul style="list-style-type: none"> ➤ Outline the principles for the pursuit of the selected SDGs and the integration of ESG factors in the various company areas; ➤ Implement the Sustainability Plan. 	Own Operations, Business Activities	Website, Company Intranet	ESRS E1, ESRS S1, ESRS S3, ESRS S4, ESRS G1
Policies on Diversity, Equity and Inclusion	<ul style="list-style-type: none"> ➤ Protection of human and workers' rights; ➤ Definition of guiding principles and areas of intervention to promote the values of diversity, equity and inclusion both within and outside the organizational structure. 	Own Operations	Website, Company Intranet	ESRS S1
Code of Ethics	<ul style="list-style-type: none"> ➤ Define the rights, duties and responsibilities of the Group towards all Recipients; ➤ Establish ethical standards and behavioural rules to guide decision-making processes and business conduct; ➤ Require from the Recipients behaviours consistent with the corporate ethics principles established in the document. 	Own Operations, Business Activities	Website, Company Intranet	ESRS S1, ESRS G1 ESRS S3, ESRS S4
Remuneration Policies	<ul style="list-style-type: none"> ➤ Achieve remuneration systems linked to company results, taking into account all risks; ➤ Ensure consistency with capital, liquidity and regulations; ➤ Promote talent, corporate identity and a culture of merit. 	Own Operations	Website	ESRS 2, ESRS E1
Group Regulation on internal reporting of violations	<ul style="list-style-type: none"> ➤ Preventing offenses by defining a system of clear rules for reporting acts or facts that may constitute a violation of the rules; ➤ Ensure a transparent process and a safe environment; ➤ Define the tasks, responsibilities and protection measures of the various corporate actors involved; ➤ Provide appropriate disclosure on the reporting procedures adopted by the Group. 	Own Operations	Company Intranet	ESRS S1, ESRS G1
Group policies on product distribution	<ul style="list-style-type: none"> ➤ Define the service model, the operating and governance guidelines and the controls implemented to ensure that the Group complies with the regulations regarding the distribution of products. 	Own Operations	Company Intranet	ESRS S4
Regulation on the approval of new products and services and entry into new markets	<ul style="list-style-type: none"> ➤ Regulate the process of approval of new products and services or entry into new markets, defining the operating phases, roles and 	Own Operations, Business Activities	Company Intranet	ESRS S4



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

	responsibilities of the Corporate functions involved.			
Group policies on transparency	<ul style="list-style-type: none"> ➤ Regulate the transparency of pre-contractual and contractual conditions to protect all Customers, and in particular relations with Consumers or Retail Customers. 	Own Operations, Business Activities	Company Intranet	ESRS S4
Group policies on the processing of personal data	<ul style="list-style-type: none"> ➤ Regulate the processes relating to the Processing of Personal Data by identifying the operating phases, roles and responsibilities of the corporate bodies and functions involved in various capacities; ➤ Define a system of rules aimed at ensuring compliance with privacy regulations in business processes as well as control and mitigation of the risks associated with the activities carried out. 	Own Operations	Company Intranet	ESRS S4
Group policies on information security	<ul style="list-style-type: none"> ➤ Define principles, guidelines and rules to be applied for the management and governance of the security of information systems; ➤ Describe the scope and general contents of the IT security measures. 	Own Operations	Company Intranet	ESRS S4
Group policies on ICT and security risk management	<ul style="list-style-type: none"> ➤ Effectively manage ICT and security risk, establishing an adequate control and monitoring system; ➤ Ensure full compliance with supervisory regulations and internal regulations, in compliance with the guidelines set forth by the Bank of Italy and the EBA. 	Own Operations	Company Intranet	ESRS S4
Group policies on complaints and appeals by Customers	<ul style="list-style-type: none"> ➤ Address the management of Complaints submitted by Customers relating to banking and financial products and services, financial instruments and insurance products offered, defining the guidelines to ensure the effective protection of the interests of the Customers as well as the Group; ➤ Increase corporate awareness on the issue; ➤ Involve the various corporate structures in the management of complaints, and in compliance with the various reference regulations; ➤ Prevent the emergence of disputes. 	Own Operations	Company Intranet	ESRS S4

For more information on the individual Policies, please refer to the thematic chapters that can be identified in the "Reference" column.



2022-2024 Sustainability Plan

The Group's Sustainability Plan is a document that aims to outline the strategic guidelines and short-medium term targets for all sustainability areas considered priorities for the integration of ESG factors in its business models and in its operations, with the aim of generating shared value for all Stakeholders, including households and businesses in the areas in which the Group operates.

With the desire to be increasingly close to the expectations of our interlocutors, stakeholders were involved in the process of defining the targets for each material sustainability issue. In fact, on the basis of the information collected through surveys conducted with various Stakeholders and thanks to a constant dialogue with them, the Group has identified the performance indicators to be achieved, consistent with both the preferences expressed by the Stakeholders and with the company strategic guidelines. It also undertakes to periodically monitor the results achieved by adopting adequate management solutions.

The Board of Directors approved the first 2022-2024 Sustainability Plan of the Cassa di Risparmio di Asti Group on 16 December 2022, resolutely affirming its commitment to environmental, social and governance issues. On 18 January 2024, it approved its update for the year 2024, with a view to continuous adjustments of the initiatives, processes and strategies for integration of ESG factors into banking processes at all levels.

The initiatives envisaged in the Plan, divided into thematic areas, have as their common denominator the objective expressed in the Group Sustainability Policies, namely that of wanting to "be an active partner in the transition to a sustainable economy, both directly, at level of direct impacts, and indirectly, as regards the impacts deriving from its business".

The Plan was developed according to the following thematic areas:

- Integration of ESG risk factors in the phases of the credit process;
- Development of new products;
- Monitoring and reporting;
- Environment;
- Human Resources;
- Digitalization;
- Communication and relations with the territory.

Despite the complexity of the reference context, the results obtained were in line with expectations. As at 31 December 2024, the Sustainability Plan, defined for the three-year period 2022-2024, showed an advancement of 95%.

The main initiatives broken down by thematic area are shown below.

Integration of ESG risk factors in the phases of the credit process

This thematic area includes initiatives aimed at integrating:

- the physical and transition risks of corporate counterparties;
- physical risks and energy certifications relating to collateral properties;
- ESG qualitative questionnaires intended for business customer counterparties.



New Product Development

Sustainability-Loan Imprese: this is a mortgage dedicated to supporting companies that make investments to improve their sustainability profile. The SLI is characterized by a reward mechanism that allows the company to obtain a benefit linked to the financing by signing the commitment to achieve specific objectives (KPIs) in the ESG area.

Mutuo Green Taxonomy Aligned (GAR Approved) called *Green T*: this is an extension of the characteristics of the mortgage loan to individuals, applicable to residential properties in Classes A and B and with High or Very High Physical Risk. The Ceiling is intended to fully finance mortgages for the purchase of properties aligned with Taxonomy criteria. For properties built after 2020, the NZEB criteria prescribed by the Taxonomy Regulation are respected.

Monitoring and Reporting

ESG data has been included in the Data Quality framework in order to rigorously evaluate the methodologies used and the quality of data provided by third parties.

Environment

Installation of photovoltaic panels at a property owned by the Bank for the production of renewable energy and construction of a photovoltaic field within the area served by the primary substation of the headquarters in Asti.

Human Resources

Internal training on sustainability issues: several ESG-themed training courses were selected, offered and attended during the year. These include information courses dedicated to all colleagues, as well as specialized modules, aimed at responding to the different needs of the functions and offices directly involved in ESG developments. These include, for example, the ESG Expert course and the one dedicated to CSRD and the EFRAG Standards offered by ABI Formazione.

Digitalization

Dematerialization of contracts and accounting operations: implementation of efficiency measures and initiatives to raise awareness in the Sales Network regarding the use of AES (advanced electronic signature) and DS (digital signature) by involving Customers in the use of internet banking and ATMs. The activity was supported by the implementation of a dashboard in order to monitor its performance.

Communication and relations with the territory

Scheduling of in-person training events for customer companies, aimed at providing them with all the tools useful for learning more about ESG issues and accompany them through the transition process.

The initiatives carried out impact a number of Stakeholders and at the same time ensure that the Group is mutually influenced by them, covering the entire value chain.



SUSTAINABILITY STATEMENT

GENERAL DISCLOSURES

Initiatives in the Credit area, for example, are aimed at Customers, but also necessarily at the Bank's service and data providers. The communication activities are addressed not only to Customers but also to local communities, regardless of whether they are Customers or not. Similarly, environmental, social and digitalization initiatives generate benefits for all members of local communities, such as the contest for schools that involved classes of schools in the Asti area in a competition linked to the issue of abuse and mistreatment. The contest, promoted in collaboration with a local charity, aimed to promote the anti violence and stalking toll-free number 1522.

Finally, there is no shortage of initiatives dedicated to Employees, in particular those in the human resources area, designed to generate a positive impact in terms of awareness, such as the membership in the Diversity & Inclusion in Finance Observatory, organized by ABI, which saw the participation of around 60 bank managers in the fields of DE&I, HR, Sustainability, Communication and Marketing and in which the issues of inclusion in all its forms were highlighted and discussed.

For further details, the extract of the Sustainability Plan is provided below with reference to the objectives and targets defined with a time horizon of 2024.

ESRS	Initiative	Value chain	Final target	Target achieved	Perimeter
Integration of ESG risk factors in the phases of the credit process					
E1 – Climate Change	Physical and transition risk Integration of physical and transition risk in the credit rating assessment process for corporate counterparties	<i>Business</i>	Process integration and internal regulations	100%	Banca di Asti
E1 – Climate Change	EPC data integration EPC data integration to support the valuation of the of the collateral properties (restriction of the LTV Task to the EPC)	<i>Business</i>	Process integration and internal regulations	60% Closing in the following year	Banca di Asti
E1 – Climate Change	Integration of the company's ESG Score into the ELR Integration of the company's ESG Score in the Electronic Loan Request (ELR) that can be used in the assessment of credit rating, by collecting information from various internal and external sources, tending to favour real data from Customers, collected through specific questionnaires	<i>Business</i>	Process integration and internal regulations	65% Closing in the following year	Banca di Asti
E1 – Climate Change	Physical risk and collateral properties Integration of "Physical Risk" data to support the valuation of the collateral properties	<i>Business</i>	Process integration and internal regulations	85% Closing in the following year	Banca di Asti



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

E1 – Climate Change	Evolution of the RAF Evolution of the Risk Appetite Framework through the inclusion of ESG metrics in credit disbursement policies	<i>Business</i>	Definition of RAS objectives and thresholds with ESG metrics	70% Initiative related to the 2025-2027 strategic plan	Group
Development of new products and Commercial Policies					
E1 – Climate Change	Integration of Commercial Policies Feasibility study aimed at defining pricing policies that also incorporate the ESG component	<i>Business</i>	Implementation of the feasibility study	Initiative linked to the completion of the integration of ESG risk factors in the phases of the credit process	Banca di Asti
S3 – Affected communities	Raising awareness of ESG matters for businesses Dissemination events for companies that address ESG and sustainable transition issues through concrete cases and operational tools, with the aim of strengthening awareness of the opportunities and risks that the transformation process entails	<i>Business</i>	Implementation of 2 events	100%	Banca di Asti
S4 – Consumers and end-users	Sustainability-Loan Imprese Mortgage dedicated to supporting companies that make investments to improve their sustainability profile. The Sustainability-Loan Imprese may be characterized by a reward mechanism that will allow the company to obtain a benefit linked to the financing by signing a commitment to achieve specific objectives (KPIs) in the ESG area	<i>Business</i>	Product release	100%	Banca di Asti
S4 – Consumers and end-users	Mutuo Green Taxonomy Aligned (GAR Approved) Extension of the characteristics of the mortgage in order to align it with the Taxonomy and extension to the Classes B in order to expand the audience of potential interested Customers	<i>Business</i>	Release of the ceiling	100%	Banca di Asti
S4 – Consumers and end-users	Muoviamoci con Erbavoglio Extension of the product to Hybrid vehicles (in addition to Full Electric vehicles)	<i>Business</i>	Product extension	100%	Banca di Asti
S4 – Consumers and end-users	Full digital bank drafts Activation, collaboration in with	<i>Business</i>	Conclusion of operational test phase	100%	Banca di Asti


SUSTAINABILITY
STATEMENT

GENERAL
DISCLOSURES

	Cedacri and ABI Lab, of a platform able to manage in real time and fully digital the issue and collection of bank drafts through Blockchain technology.				
--	---	--	--	--	--

Monitoring and Reporting

G1 – Business conduct	Compliance Risk Assessment in the ESG area Annual performance and continuous updating of the Compliance Risk Assessment relating to the mapping and assessment of risks in the ESG area	<i>Own Operations</i>	Performance of activities	100%	Group
G1 – Business conduct	ESG Audit Plan Provision for inclusion in the annual Audit Plan of checks on ESG aspects	<i>Own Operations</i>	Performance of activities	100%	Group
E1 – Climate Change	Update of analyses related to physical and transition risks Update of the materiality analysis and assessments conducted as part of the ICAAP/ILAAP process in terms of physical and transition risk	<i>Business</i>	Update of materiality analysis	100%	Group
E1 – Climate Change S1 – Own workforce S3 – Affected communities S4 – Consumers and end-users G1 – Business conduct	Update of the set of quantitative ESG KPIs Update of the set of quantitative ESG KPIs used to measure the degree of achievement of sustainable targets and monitoring of information flows for the Corporate Bodies	<i>Business, Own Operations</i>	Identification of sets of ESG KPIs and integration of information flows for Corporate Bodies	40% Initiative related to the 2025-2027 strategic plan. The KPIs are being defined in line with future strategic objectives	Banca di Asti
E1 – Climate Change	ESG data in the Data Quality framework Inclusion of ESG data in the Data Quality framework in order to rigorously evaluate the methodologies used and the quality of data provided by third parties	<i>Business</i>	Activation of Data Quality controls on ESG data	100%	Banca di Asti

Environment

E1 – Climate Change	Photovoltaic Systems Installation of photovoltaic panels at an owned property for the production of renewable energy and construction of a photovoltaic field within the area served by the primary substation of the Asti headquarters	<i>Own Operations</i>	Preparation of a plant for the production of 440,000 Kwh/year	100%	Banca di Asti
----------------------------	---	-----------------------	---	------	---------------


GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

E1 – Climate Change	Conversion of company car fleet Conversion of the company car fleet to hybrid/electric power supply available to the Head Office Organizational Units	<i>Own Operations</i>	Conversion of 100% company car fleet for office use	100%	Banca di Asti
E1 – Climate Change	Installation of electric charging columns and recharging stations Installation of electric charging columns and recharging stations that can be used to power company cars	<i>Own Operations</i>	Installation of 10 electric charging columns/recharging stations	100%	Banca di Asti
E1 – Climate Change	Creation of smart branches with remote control Integration of "security technologies" with those of normal property management (lighting, cooling, heating, etc.), in order to monitor energy consumption	<i>Own Operations</i>	Activation of 5 remote-controlled branches	100%	Banca di Asti
E1 – Climate Change	Monitoring of consumption Preparation of a dashboard in order to implement a system for controlling and monitoring electricity consumption and waste management	<i>Own Operations</i>	Activation of monitoring	50% It was decided not to proceed with the development of the waste component as it did not emerge as a material issue from the Double Materiality process	Banca di Asti
S3 – Affected communities G1 - Business conduct	Sustainability of the supply chain Collection of the NFS of the main Suppliers	Suppliers	Request to the main Suppliers	100%	Banca di Asti
E1 – Climate Change S3 – Affected communities	Circular economy of mobile phones Recycling of unused and discarded mobile phones of the Bank (to date around 200) through donation to the company Jane Goodall Institute, which deals with the recovery and recycling of donated devices. The donation will help support the costs of education in an orphanage in Tanzania	<i>Own Operations</i>	Recycling of 100% discarded mobile phones at the date of donation	100%	Banca di Asti
E1 – Climate Change	Participation in ESG campaign Participation in the "M'illumino di meno" initiative to raise employees' awareness of	<i>Own Operations</i>	Participation in the initiative	100%	Pitagora



**SUSTAINABILITY
STATEMENT**

**GENERAL
DISCLOSURES**

	a more informed and correct use of electricity				
E1 – Climate Change	Water dispensers Reduction of the use of plastic thanks to the expansion of water access points at the branches	<i>Own Operations</i>	Expansion to 20 branches	100%	Pitagora
E1 – Climate Change	Conversion of company car fleet Conversion of the pooled car fleet into a hybrid car fleet	<i>Own Operations</i>	Conversion of 80% of the car fleet	100%	Pitagora
E1 – Climate Change	Electricity from renewable sources Purchase of energy generated from renewable sources	<i>Own Operations</i>	Purchase of electricity from 100% renewable sources	100%	Pitagora

Human Resources

S1 – Own workforce	Internal training on sustainability issues Implementation of an internal communication and training campaign on sustainability issues with a focus on the corporate target	<i>Own Operations</i>	Training for all business managers	100%	Banca di Asti
S1 – Own workforce	Professional growth of resources Recognition of potentials and skills; Development of a training plan aimed at the growth of resources; Youth Academy; The performance evaluation as a moment of professional growth	<i>Own Operations</i>	Potential Recognition; Activation of the training plan; Activation of the Academy; Performance evaluations	95% The mapping of potentials will be completed in the following year	Banca di Asti
S1 – Own workforce	Flexible working: Increase of Smart Working-Learning days Application of the "Next way of working" model (hybrid: in person/remote), reducing CO2 and ensuring greater flexibility for the Group's people.	<i>Own Operations</i>	50% increase in days usable for home-work commute > 80 km	100%	Banca di Asti
S1 – Own workforce	Participation in the D&I Observatory The Diversity & Inclusion in Finance Observatory, organized by ABI, envisages the participation of around 60 bank managers in the fields of DE&I, HR, Sustainability,	<i>Own Operations</i>	Participation in the initiative	100%	Banca di Asti


GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

	Communication and Marketing				
G1 – Business conduct	ESG training for the Board of Directors Training plan for the Board of Directors with initiatives dedicated to ESG issues, as described in the "Regulation on the composition and self-assessment of the Board of Directors"	<i>Own Operations</i>	Training provided	100%	Group
S1 – Own workforce	ESG training of investment advisors and private managers Training plan aimed at obtaining an ESG certification for investment advisors and private managers	<i>Own Operations</i>	40% of Employees-recipients	90% 39 Employees were trained	Banca di Asti
S1 – Own workforce	NRRP training for the Network Strengthening training activities for the Sales Networks with reference to the objectives of the NRRP (digitalization and innovation, ecological transition and social inclusion) and related measures	<i>Own Operations</i>	Training provided	100%	Banca di Asti
E1 – Climate Change S1 – Own workforce	Bike sharing Payment to Employees of the annual subscription for the "bike sharing" service	<i>Own Operations</i>	Purchase of 10 annual subscriptions	100%	Pitagora
S1 – Own workforce	Female leadership training Introduction of new training sessions on the growth of transversal and managerial skills	<i>Own Operations</i>	Activation of new annual sessions	100%	Pitagora

Digitalization

E1 – Climate Change S4 – Consumers and end-users	Dematerialization of contracts and accounting operations Measures to increase the efficiency and awareness of the Sales Network on the use of the AES (advanced electronic signature) and the DS (digital signature) involving the Customer in the use of internet banking and ATMs	<i>Own Operations, Business</i>	70% of accounting operations and digital contracts	100%	Banca di Asti
E1 – Climate Change S4 – Consumers and end-users	Remote digital signature Extension of the remote digital signature to all products offered	<i>Own Operations, Business</i>	75% of contracts signed digitally	100%	Pitagora


SUSTAINABILITY
STATEMENT

GENERAL
DISCLOSURES

Communication and relations with the territory

S3 – Affected communities	Participation in initiatives on ESG issues Participation in national/international initiatives (e.g. Day against violence against women, Mobility Week, M'illumino di meno, Pulire il mondo, etc.)	<i>Own Operations</i>	Participation in 2 social initiatives and 3 environmental initiatives	100%	Banca di Asti
S3 – Affected communities	Tactical urban planning initiatives Redevelopment of parks and/or areas of cities in which the Bank operates with low-cost urban regeneration processes that have high social content and high communication impact	<i>Own Operations</i>	Implementation of an initiative	100%	Banca di Asti
S3 – Affected communities S4 – Consumers and end-users	Outreach events Sustainability training and outreach events aimed at the community, also in partnership with local operators to support the production activities of the territory	<i>Own Operations, Business</i>	Implementation of 2 events	100%	Banca di Asti
S4 – Consumers and end-users	Planning of training events In-person training sessions for Customer companies, aimed at providing them with all the tools useful for learning more about ESG issues and accompany them through the transition process.	<i>Business</i>	Implementation of 2 training events	100%	Banca di Asti
S3 – Affected communities	Contest for schools Involvement of schools in the areas in which the Bank operates in competitions linked to sustainable and/or social issues	<i>Own Operations</i>	Implementation of the contest	100%	Banca di Asti
S4 – Consumers and end-users	ESG disclosure Sending information to Customers regarding the Bank's sustainable initiatives also through social media channels	<i>Business</i>	Structured activation of the service	100%	Banca di Asti
S4 – Consumers and end-users	Poliambulatorio Salutissima in Asti Possibility for Customers to use the Service Charter for the family of assistance and well-being services (FAB) at the Poliambulatorio di Asti (Mutual Aid Society, Occupational Medicine, dental department, physiotherapy)	<i>Business</i>	Activation of the service	100%	Banca di Asti



GENERAL
DISCLOSURES

SUSTAINABILITY
STATEMENT

S4 – Consumers and end-users	Fact-finding questionnaire dedicated to companies Analysis, in-depth study and recall of the questionnaire administered between 18/10/2023 and 30/11/2023 to approximately 40,000 business Customers on customers satisfaction, ESG issues, knowledge/interest in subsidized finance services, business consulting, foreign trade and insurance	<i>Business</i>	Processing and dissemination of results	100%	Banca di Asti
S3 – Affected communities	Participation in charitable initiatives Annual participation in at least one charitable philanthropic activity for the implementation of projects in favour of indigents	<i>Own Operations</i>	Participation in at least one initiative	100%	Pitagora

The costs incurred in 2024 for the implementation of the ESG initiatives described above equal to EUR 2,188,784 of which EUR 294,288 is Opex and EUR 1,894,496 is Capex.

The most significant initiatives include the one relating to photovoltaic plants, for which investments of EUR 1,722,409.05 were incurred. This expense was charged to item 90 Property, plant and equipment.



DISCLOSURE PURSUANT TO ARTICLE 8 OF REGULATION 2020/852 (European Taxonomy Regulation)

In line with what was outlined in the European Union Action Plan on sustainable finance, on 18 June 2020 the European Parliament adopted Regulation 2020/852/EU on the establishment of a framework (the so-called "European Taxonomy") aimed at making the sustainability performance of companies operating in the same sector comparable, outlining a common language for the definition of environmentally sustainable activities and thus contributing to the achievement of the objectives of the European Green Deal.

Through this regulation, the regulator aims to provide investors with the necessary tools to compare the performance of companies with reference to six climate and environmental objectives:

1. Climate change mitigation;
2. Climate change adaptation;
3. Sustainable use and protection of water and marine resources;
4. Transition to a circular economy;
5. Pollution prevention and reduction;
6. Protection and restoration of biodiversity and ecosystems.

In this regard, the regulator has established specific criteria to determine whether an economic activity can be considered "environmentally sustainable" (so-called "activity aligned with the European Taxonomy"). In particular, the classification of an "environmentally sustainable" activity involves passing a three-phase analysis:

- Substantial contribution: the activity must contribute substantially to the achievement of one or more objectives outlined by the European Taxonomy;
- Do Not Significant Harm (DNSH): the activity must not cause significant harm to the remaining objectives;
- Compliance with minimum safeguards: the performance of activities must be accompanied by compliance with minimum safeguards in terms of human rights, corruption/extortion, taxation and fair competition.

The legislation provides for a gradual implementation of disclosure obligations. In particular, it envisages, for 2024 and specifically for credit institutions, the reporting of information on alignment with the EU Taxonomy for the first two climate objectives and on eligibility regarding the remaining four environmental objectives. However, it should be noted that, for this reporting year, if precise data relating to alignment were available for the remaining environmental objectives, these were included in the reporting.

In 2024, the Group recorded an increase in the Green Asset Ratio of +94% (+98% if we consider the GAR based on CapEx) (0.5% based on Turnover and 0.5% based on CapEx 2023), mainly thanks to the updating of methodologies and approaches for verifying the alignment of exposures to individuals. The flow indicator shows an increase, equal to +9.8%, for both Turnover and CapEx (equal to 0.005% for both Turnover and CapEx in 2023). The KPIs regarding assets under management and financial guarantees recorded a significant increase this year, mainly due to the

**Results for the year
2024**



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

reporting in the 2023 NFS of the eligibility and alignment KPIs by the Credit Institutions. This also made it possible to identify the off-balance component of the counterparties to be included in the calculation.

Template o - Summary of KPIs

Main KPI	Total environmentally sustainable assets	Turnover Based KPIs	Capex Based KPIs	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Green asset ratio (GAR) stock	Turnover Based: 99,112,343 Capex Based: 99,551,427	0.99%	0.99%	77.0%	56.6%	23.0%

Additional KPIs	Total environmentally sustainable assets	Turnover Based KPIs	Capex Based KPIs	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
GAR (flow)	Turnover Based: 5,445,385 Capex Based: 5,445,944	0.054%	0.054%	77.0%	56.6%	23.0%
Trading book						
Financial guarantees	Turnover Based: 12 Capex Based: 12	1.0%	1.0%			
Assets under management	Turnover Based: 8,737,558 Capex Based: 9,815,185	4.6%	5.1%			
Fees and commissions income						

Green Asset Ratio The Green Asset Ratio (GAR) is the percentage of Group assets that finance "environmentally sustainable" economic activities pursuant to the European Taxonomy with respect to the total assets covered by the indicator, as defined in Article 1.1.2 of Annex V of the Delegated Regulation 2021/2178/EU.

Specifically, the Group calculated the GAR by applying the following rules:

- inclusion in the numerator and denominator of exposures to financial and non-financial counterparties subject to NFRD (Directive 2013/23/EU), exposures to households and local governments and real estate collateral recovered;



- exclusion from the GAR numerator of exposures to companies not subject to NFRD, on demand interbank loans, cash and cash-related assets, other categories of assets and derivatives;
- exclusion from both the numerator and the denominator of assets held for trading and of exposures to central governments, central banks and supranational issuers.

In addition to the representation of the GAR according to a flow and stock logic, as reported above, the relevant regulations require credit institutions to report the KPI through a breakdown into exposures by sectors covered by the European Taxonomy, according to NACE codes. It should be noted that, if the activities of a counterparty pertain to two or more sectors, the Group considers only the exposures attributable to NACE sectors eligible under the European Taxonomy and selects the most significant sector for the counterparty. In addition, in the absence of specific information on the use of the income associated with the Group's activities, the exposures were considered as generic loans in the process of assessing the eligibility and alignment of the portfolio.

Moreover, it is important to underline that the total assets included in template 1 (line 53) differ from the total assets reported in the Group Consolidated Financial Statements as at 31/12/2024, as the latter considers the revaluations of the gross book value.

The details of the methods adopted in order to populate the templates required by the regulations for exposures relating to the various categories of the following counterparties are provided below:

Financial and non-financial undertakings

The Group carried out a detailed analysis of the portfolio data, in accordance with the requirements of the European Taxonomy Regulation. The eligible and/or aligned exposures are measured through the use of the KPIs published by the counterparties in their respective Non-Financial Statements in relation to turnover and capital expenditure. In particular, with reference to insurance counterparties, the weighting for the indicator based on turnover and capital expenditure is calculated for the climate change adaptation objective as the weighted average of the KPI relating to subscription activities and the respective KPI of investment.

Households

Exposures to households (lines 24 to 27, template 1) include loans to households and their related classification into the following classes:

- loans collateralised by residential immovable property;
- building renovation mortgage loans;
- consumer credit for the purchase of motor vehicles.

These types of exposures constitute almost all of the aligned with respect to the total assets hedged. The Group carried out an analysis of its portfolios in compliance with the European Taxonomy Regulation, identifying exclusively loans collateralised by residential immovable property.

With reference to line 25, template 1, "loans collateralised by residential immovable property", the exposures to households attributable to the economic activity "7.7



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

Acquisition and ownership of buildings" of Annex I of Regulation 2021/2139/EU were identified, and therefore eligible for the European Taxonomy. For the verification of aligned exposures, the Group considered:

- for properties built before 31/12/2020, properties included in the top 15% of the national real estate stock in terms of primary operational energy requirements, selecting only properties with an energy performance certificate in classes A and B. With regard to the DNSH principle, assessments were carried out based on the analysis of the physical risks already integrated into the Banca di Asti systems. The Group considered the DNSH criterion satisfied only for exposures relating to properties with a physical risk score classified as "Low" and "Very Low". Compared to the 2023 financial year, the Group has implemented improvement actions in the collection of data and information on this type of exposure, resulting in an increase in the GAR;
- for properties built after 31/12/2020, properties with a primary operational energy requirement 10% lower than the threshold established for Net Zero Energy Buildings, consequently selecting only properties with energy performance certificates belonging to the two highest classes. Similarly, the DNSH criterion was considered satisfied only for properties with a physical risk score classified as "Low" and "Very Low". Furthermore, none of the properties selected has an area exceeding 5,000 m².

Local governments

Exposures to local governments (lines 28 to 30, template 1) include loans intended to finance public housing projects or other specialized lending for which the use of the proceeds is known. Currently, the Group does not have sufficiently detailed information to support this assessment. In consideration of this, the Group has opted for a precautionary approach, declaring no exposures to local governments with the use of the income known in the template.

**KPIs for off-balance
sheet exposures -
AuM and FinGuar
KPIs**

In line with the reporting models of the GAR KPI, the AuM KPI and the FinGuar KPI, respectively relating to assets under management in line with the European Taxonomy and the financial guarantees granted in line with the Taxonomy, are reported by the Group according to the stock and flow models. In particular, the Group considered all exposures attributable to these categories to counterparties subject to NFRD as the denominator, while the numerator considered the data relating to counterparties subject to NFRD that have levels of eligibility and alignment with the EU Taxonomy, with the same logics presented above to financial and non-financial counterparties.

**KPIs for exposures
relating to activities
related to the Gas &
Nuclear sectors**

In line with Delegated Regulation 2022/1214/EU, credit institutions must report information on their exposures to counterparties whose activities are related to the natural gas and nuclear sectors. Therefore, this document discloses information on the percentages and gross book value of the Group's exposures to non-eligible, eligible but not aligned and aligned activities pursuant to the European Taxonomy with reference to all KPIs applicable to credit institutions, in terms of turnover and capital expenditure. The analysis carried



out shows that there were no exposures to these types of activities with regard to the AuM KPI and the FinGar KPI; instead, the templates were compiled as per Annex XII for the applicable GAR Stock and GAR Flow KPIs, both in two versions (Turnover and CapEx).

The approach of the Cassa di Risparmio di Asti Group to the European Taxonomy of environmentally sustainable activities

The Group undertakes not only to comply with the regulatory obligations of the EU Taxonomy Regulation, but is also committed to the progressive integration of sustainability criteria into its business and its products. For more details, please refer to section "E1 – Climate Change".



TEMPLATE 1 – Turnover [1/4]

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	31/12/2024													
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both														
1 Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	2,650,626,597	2,577,862,376	99,106,673	-	165	4,318	27,051	4,511	-	2	655	585	-	-
2 Financial undertakings	64,395,941	16,284,351	755,937	-	-	-	19,454	3,287	-	-	-	-	-	-
3 Credit institutions	64,197,408	16,255,955	755,706	-	-	-	12,163	2,115	-	-	-	-	-	-
4 Loans and advances	64,197,408	16,255,955	755,706	-	-	-	12,163	2,115	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	198,533	28,396	231	-	-	-	7,291	1,172	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	197,998	28,396	231	-	-	-	7,291	1,172	-	-	-	-	-	-
17 Loans and advances	197,998	28,396	231	-	-	-	7,291	1,172	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial undertakings	3,196,510	364,768	41,546	-	165	4,318	305	52	-	2	655	585	-	-
21 Loans and advances	3,196,510	364,768	41,546	-	165	4,318	305	52	-	2	655	585	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 Households	2,561,184,861	2,561,184,861	98,308,958	-	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	2,561,184,861	2,561,184,861	98,308,958	-	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 Local governments financing	21,849,285	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 1 – Turnover [2/4]**

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31/12/2024																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)		Of which Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)		Of which Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)		Of which Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)				
GAR - Covered assets in both																		
1	Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	773	422	-	-	183	152	-	-	-	-	-	-	2,577,891,038	99,112,343	-	166	5,929
2	Financial undertakings	0.11	-	-	-	-	-	-	-	-	-	-	-	16,303,805	759,225	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	16,268,118	757,822	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	16,268,118	757,822	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	0.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	0.11	-	-	-	-	-	-	-	-	-	-	-	35,687	1,403	-	-	-
17	Loans and advances	0	-	-	-	-	-	-	-	-	-	-	-	35,687	1,403	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	773	422	-	-	183	152	-	-	-	-	-	-	366,684	42,757	-	166	5,929
21	Loans and advances	773	422	-	-	183	152	-	-	-	-	-	-	366,684	42,757	-	166	5,929
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	-	-	-	-	-	-	-	-	-	-	-	-	2,561,184,861	97,878,929	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	2,561,184,861	97,878,929	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



follows: **TEMPLATE 1 – Turnover [3/4]**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	31/12/2024													
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
32	Assets excluded from the numerator	7,371,119,854												
33	Financial and Non-financial undertakings	4,035,677,284												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	4,024,436,878												
35	Loans and advances	2,793,573,512												
36	of w hich loans collateralised by commercial immovable property	533,238,761												
37	of w hich building renovation loans	-												
38	Debt Securities	923,544,230												
39	Equity instruments	226,519,781												
40	Third country counterparties not subject to NFRD reporting obligations	11,240,406												
41	Loans and advances	11,240,406												
42	Debt Securities	-												
43	Equity instruments	-												
44	Derivatives	89,136												
45	On demand interbank loans	26,327,026												
46	Cash and cash-related assets	60,305,186												
47	Other categories of assets (e.g. Goodwill, commodities etc.)	3,329,520,578												
48	Total GAR assets	10,021,169,764	2,577,858,777.55	98,675,801.30	-	164.56	4,318.03	27,046.75	4,511.02	-	1.89	579.72	512.77	-
49	Assets not covered for GAR calculation													
50	Central governments and	2,026,454,649	-	-	-	-	-	-	-	-	-	-	-	-
51	Central banks exposure	876,578,167	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	88,344,147	-	-	-	-	-	-	-	-	-	-	-	-
53	Total Assets		-	-	-	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	1,249	149.9	12.5	-	-	-	-	-	-	-	-	-	-
55	Assets under management	190,699,628	57,674,585	6,916,108	-	272,951	873,287	18,267,856	1,821,451	-	-	-	-	-
56	Of which debt securities	190,699,628	57,674,585	6,916,108	-	272,951	873,287	18,267,856	1,821,451	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-

SUSTAINABILITY
STATEMENTENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 1 – Turnover [4/4]**

	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
	31/12/2024																	
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE+ PPC + BIO)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling		
32	Assets excluded from the numerator																	
33	Financial and Non-financial undertakings																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt Securities																	
39	Equity instruments																	
40	Third country counterparties not subject to NFRD reporting obligations																	
41	Loans and advances																	
42	Debt Securities																	
43	Equity instruments																	
44	Derivatives																	
45	On demand interbank loans																	
46	Cash and cash-related assets																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																	
48	Total GAR assets	744.23	417.86	-	-	173.00	103.00	-	-	-	-	-	-	2,577,887,321.25	98,681,345.94	-	164.56	4,319.92
49	Assets not covered for GAR calculation																	
50	Central governments and Supranational issuers	-	-	-	-	-	-	-	-	-	-	-	-					
51	Central banks exposure	-	-	-	-	-	-	-	-	-	-	-	-					
52	Trading book	-	-			-	-			-	-							
53	Total Assets													98,681,345.94	-	164.56	4,319.92	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	149.88	12.49	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	75,942,440.92	8,737,558.09	-	272,950.77	873,286.63
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	75,942,440.92	8,737,558.09	-	272,950.77	873,286.63
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



TEMPLATE 1 – Turnover (T-1) [1/4]

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
												45,291.00		
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)			Water an marine resource (WTR)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
GAR - Covered assets in both														
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	2,432,308,427	2,401,962,208	57,927,311	-	-	-	118,114	-	-	-	-	-	-	-
1 Financial undertakings	18,800,606	222,775	-	-	-	-	116,395	-	-	-	-	-	-	-
3 Credit institutions	18,351,908	222,691	-	-	-	-	-	-	-	-	-	-	-	-
4 Loans and advances	17,545,058	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	806,85	222,691	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	446,698	84	-	-	-	-	116,395	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	447,598	-	-	-	-	-	116,395	-	-	-	-	-	-	-
17 Loans and advances	447,598	-	-	-	-	-	116,395	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial undertakings	166,664	42,199	5,576	-	-	-	1,719	-	-	-	-	-	-	-
21 Loans and advances	166,664	42,199	5,576	-	-	-	1,719	-	-	-	-	-	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 Households	2,401,885,489	2,401,697,234	57,921,736	-	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	2,401,697,234	2,401,697,234	57,921,736	-	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	188,254	-	-	-	-	-	-	-	-	-	-	-	-	-
28 Local governments financing	11,455,669	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	11,455,669	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 1 – Turnover (T-1) [2/4]**

	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	31/12/2023																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both																	
1 Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	2,402,080,322	57,927,311	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	339,169	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	222,691	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	222,691	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	116,479	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	116,395	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	116,395	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	43,918	5,576	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	43,918	5,576	-	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 Households	-	-	-	-	-	-	-	-	-	-	-	-	2,401,697,234	57,921,736	-	-	-
25 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	2,401,697,234	57,921,736	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



follows: TEMPLATE 1 – Turnover (T-1) [3/4]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total gross carrying amount	31/12/2023												
			Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)			Water an marine resource (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		Of which Use of Proceeds
										Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	
32	Assets excluded from the numerator	9,609,427,415													
33	Financial and Non-financial undertakings	3,985,853,942													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	3,974,631,316													
35	Loans and advances	2,909,265,862													
36	of w hich loans collateralised by commercial immovable property	2,604,555,014													
37	of w hich building renovation loans	-													
38	Debt Securities	1,000,094,304													
39	Equity instruments	65,271,150													
40	Third country counterparties not subject to NFRD reporting obligations	11,222,626													
41	Loans and advances	11,222,626													
42	Debt Securities	-													
43	Equity instruments	-													
44	Derivatives	18,311,756													
45	On demand interbank loans	28,900,602													
46	Cash and cash-related assets	62,792,033													
47	Other categories of assets (e.g, Goodwill, commodities etc.)	5,513,569,081													
48	Total GAR assets	12,041,735,842	2,401,962,208	57,927,311	-	-	-	118,114	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation														
50	Central governments and Supranational issuers	713,029	-	-	-	-	-	-	-	-	-	-	-	-	-
51	Central banks exposure	846,509,550	-	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	38,481,751	-	-	-	-	-	-	-	-	-	-	-	-	-
53	Total Assets		2,401,962,208	57,927,311	-	-	-	118,114	-	-	-	-	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	41,849,134	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	1,676,254,967	115,704,851	-	-	-	-	-	-	-	-	-	-	-	-
56	Of w hich debt securities	1,676,254,967	115,704,851	-	-	-	-	-	-	-	-	-	-	-	-
57	Of w hich equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 1 – Turnover (T-1) [4/4]

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31/12/2023																
		Circular economy (CE)			Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which transitional	Of which enabling
32	Assets excluded from the numerator																	
33	Financial and Non-financial undertakings																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt Securities																	
39	Equity instruments																	
40	Third country counterparties not subject to NFRD reporting obligations																	
41	Loans and advances																	
42	Debt Securities																	
43	Equity instruments																	
44	Derivatives																	
45	On demand interbank loans																	
46	Cash and cash-related assets																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																	
48	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	2,402,080,322	57,927,311	-	-	-
49	Assets not covered for GAR calculation																	
50	Central governments and Supranational issuers	-	-	-	-	-	-	-	-	-	-	-	-					
51	Central banks exposure	-	-	-	-	-	-	-	-	-	-	-	-					
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-					
53	Total Assets	-	-	-	-	-	-	-	-	-	-	-	-	2,402,080,322	57,927,311	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	41,849,134	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	1,676,254,967	115,704,851	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	1,676,254,967	115,704,851	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



TEMPLATE 1 – Capex [1/4]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
										Of which Use of Proceeds	Of which enabling				
<u>GAR- Covered assets in both</u>															
1	Loans and advances, debt securities and equity instruments not H/T eligible for GAR calculation	2,650,626,597	2,578,073,498	99,539,147	-	462	94,089	33,342	10,376	-	-	1,897	1,735	-	-
2	Financial undertakings	64,395,941	16,656,764	1,070,412	-	80	1,055	24,107	7,308	-	-	-	-	-	-
3	Credit institutions	64,197,408	16,631,752	1,067,594	-	-	-	17,932	6,310	-	-	-	-	-	-
4	Loans and advances	64,197,408	16,631,752	1,067,594	-	-	-	17,932	6,310	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	198,533	32,067	3,370	-	80	1,055	7,354	3,011	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	197,998	32,067	3,370	-	80	1,055	7,354	3,011	-	-	-	-	-	-
17	Loans and advances	197,998	32,067	3,370	-	80	1,055	7,354	3,011	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	3,196,510	199,806	156,407	-	302	91,978	1,881	57	-	-	1,897	1,735	-	-
21	Loans and advances	3,196,510	199,806	156,407	-	302	91,978	1,881	57	-	-	1,897	1,735	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	2,561,184,861	2,561,184,861	98,308,958	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	2,561,184,861	2,561,184,861	98,308,958	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	21,849,285	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 1 – Capex [2/4]

		o		p	q	r	s		t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)					Pollution (PPC)					31/12/2024 Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds		Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds		Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	
GAR - Covered assets in both																				
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	485	40	-	-	-	199	129	-	-	-	-	-	-	-	2,578,109,421	99,551,427	-	462	96,670
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,680,872	1,077,720	-	80	1,055
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,649,684	1,073,904	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,649,684	1,073,904	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	39,420	6,381	-	80	1,055
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	39,420	6,381	-	80	1,055
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	485	40	-	-	-	199	129	-	-	-	-	-	-	-	204,269	158,368	-	302	94,559
21	Loans and advances	485	40	-	-	-	199	129	-	-	-	-	-	-	-	204,269	158,368	-	302	94,559
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,578,109,421	99,551,427	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,578,109,421	99,551,427	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



follows: TEMPLATE 1 – Capex [3/4]

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	31/12/2024													
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
32	Assets excluded from the	7,371,119,854												
33	Financial and Non-financial undertakings	4,035,677,284												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	4,024,436,878												
35	Loans and advances	2,793,573,512												
36	of which loans collateralised by commercial immovable property	533,238,761												
37	of which building renovation loans	-												
38	Debt Securities	923,544,230												
39	Equity instruments	226,519,781												
40	Third country counterparties not subject to NFRD reporting obligations	11,240,406												
41	Loans and advances	11,240,406												
42	Debt Securities	-												
43	Equity instruments	-												
44	Derivatives	89,136												
45	On demand interbank loans	26,327,026												
46	Cash and cash-related assets	60,305,186												
47	Other categories of assets (e.g. Goodwill, commodities etc.)	3,329,520,578												
48	Total G&R assets	10,021,169,764	2,578,079,594.14	98,949,915.09	-	382.19	93,033.47	25,532.74	7,365.07	-	-	1,521.21	1,374.26	- 54.54
49	Assets not covered for G&R	2,991,376,963												
50	Central governments and Supranational issuers	2,026,454,649												
51	Central banks exposure	876,578,167												
52	Trading book	88,344,147												
53	Total Assets		2,578,079,594.14	98,949,915.09	-	382.19	93,033.47	25,532.74	7,365.07	-	-	1,521.21	1,374.26	- 54.54
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	1,249	162.36	12.49	-	-	-	-	-	-	-	-	-	-
55	Assets under management	190,699,628	58,886,587	7,993,735	-	272,951	1,007,458	18,267,875	1,821,451	-	-	-	-	-
56	Of which debt securities	190,699,628	58,886,587.41	7,993,735.34	-	272,951.45	1,007,457.78	18,267,875.49	1,821,450.53	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 1 – Capex [4/4]

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31/12/2024																
		Circular economy (CE)			Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	
32	Assets excluded from the																	
33	Financial and Non-financial undertakings																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of w hich loans collateralised by commercial immovable property																	
37	of w hich building renovation loans																	
38	Debt Securities																	
39	Equity instruments																	
40	Third country counterparties not subject to NFRD reporting obligations																	
41	Loans and advances																	
42	Debt Securities																	
43	Equity instruments																	
44	Derivatives																	
45	On demand interbank loans																	
46	Cash and cash-related assets																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																	
48	Total GAR assets	362.34	27.25	-	-	148.13	86.00	-	-	-	-	-	-	2,578,107,158.56	98,958,767.66	-	382.19	93,033.47
49	Assets not covered for GAR																	
50	Central governments and Supranational issuers																	
51	Central banks exposure																	
52	Trading book																	
53	Total Assets	27.25	-	-	148.13	86.00	-	-	-	-	-	-	2,578,107,158.56	98,958,767.66	-	382.19	93,033.47	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	162.36	12.49	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	77,154,462.90	9,815,185.87	-	272,951.45	1,007,457.78	
56	Of w hich debt securities	-	-	-	-	-	-	-	-	-	-	-	77,154,462.90	9,815,185.87	-	272,951.45	1,007,457.78	
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



TEMPLATE 1 – Capex (T-1) [1/4]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total gross carrying amount	31/12/2023												
			Climate Change Mitigation (CCM)			Climate Change Adaptions (CCA)			Water an marine resource (WTR)						
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)						
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
<u>GAR - Covered assets in both</u>															
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	2,432,308,427	2,407,775,207	57,941,404	-	-	-	121,163	-	-	-	-	-	-	-
2	Financial undertakings	18,800,606	6,018,247	-	-	-	-	116,382	-	-	-	-	-	-	-
3	Credit institutions	18,351,908	6,017,936	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	17,545,058	6,017,936	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	806,85	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	448,698	311	-	-	-	-	116,382	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	447,598	-	-	-	-	-	116,382	-	-	-	-	-	-	-
17	Loans and advances	447,598	-	-	-	-	-	116,382	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	166,664	59,725	19,668	-	-	-	4,782	-	-	-	-	-	-	-
21	Loans and advances	166,664	59,725	19,668	-	-	-	4,782	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	2,401,885,489	2,401,697,234	57,921,736	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	2,401,697,234	2,401,697,234	57,921,736	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	188,254	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	11,455,669	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	11,455,669	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 1 – Capex (T-1) [2/4]

		31/12/2023																	
		o		p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			
GAR - Covered assets in both																			
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	2,407,896,370	57,941,404	-	-	-	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	6,134,629	-	-	-	-	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	6,017,936	-	-	-	-	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	6,017,936	-	-	-	-	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-		-	-		-		-		-	-	-			-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	116,693	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-		-	-		-		-		-	-	-			-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-		-	-		-		-		-	-	-			-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	116,382	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	116,382	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-		-	-		-		-		-	-	-			-	-	
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	64,507	19,668	-	-	-	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	64,507	19,668	-	-	-	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-		-	-		-		-		-	-	-			-	-	
24	Households	-	-	-	-									2,401,697	57,922	-	-	-	
25	of which loans collateralised by residential immovable property	-	-	-	-									2,401,697	57,922	-	-	-	
26	of which building renovation loans	-	-	-	-									-	-	-	-	-	
27	of which motor vehicle loans	-	-											-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	



follows: TEMPLATE 1 – Capex (T-1) [3/4]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n
		Total gross carrying amount	Climate Change Mitigation (CCM)				31/12/2023 Climate Change Adaptions (CCA)				Water an marine resource (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling			
32	Assets excluded from the	9,609,427,415													
33	Financial and Non-financial undertakings	3,985,853,942													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	3,974,631,316													
35	Loans and advances	2,909,265,862													
36	of w hich loans collateralised by commercial immovable property	2,604,555,014													
37	of w hich building renovation loans	-													
38	Debt Securities	1,000,094,304													
39	Equity instruments	65,271,150													
40	Third country counterparties not subject to NFRD reporting obligations	11,222,626													
41	Loans and advances	11,222,626													
42	Debt Securities	-													
43	Equity instruments	-													
44	Derivatives	18,311,756													
45	On demand interbank loans	28,900,602													
46	Cash and cash-related assets	62,792,033													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	5,513,569,081													
48	Total GAR assets	12,041,735,842	2,407,775,207	57,941,404	-	-	-	121.16	-	-	-	-	-	-	-
49	Assets not covered for GAR	885,704,331													
50	Central governments and Supranational issuers	713,029													
51	Central banks exposure	846,509,550													
52	Trading book	38,481,751													
53	Total Assets		2,407,775,207	57,941,404	-	-	-	121.16	-	-	-	-	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	41,849,134	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	1,676,254,967	115,704,851	-	-	-	-	-	-	-	-	-	-	-	-
56	Of w hich debt securities	1,676,254,967	115,704,851	-	-	-	-	-	-	-	-	-	-	-	-
57	Of w hich equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 1 – Capex (T-1) [4/4]**

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31/12/2023																
		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)							
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling				
32	Assets excluded from the numerator																	
33	Financial and Non-financial undertakings																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt Securities																	
39	Equity instruments																	
40	Third country counterparties not subject to NFRD reporting obligations																	
41	Loans and advances																	
42	Debt Securities																	
43	Equity instruments																	
44	Derivatives																	
45	On demand interbank loans																	
46	Cash and cash-related assets																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																	
48	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	-	2,407,896,370	57,941,404	-	-
49	Assets not covered for GAR																	
50	Central governments and Supranational issuers																	
51	Central banks exposure																	
52	Trading book																	
53	Total Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	2,407,896,370	57,941,404	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	41,849,134	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	1,676,254,967	115,704,851	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	1,676,254,967	115,704,851	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-


TEMPLATE 2 – Turnover [1/4]

		a	b	c	d	e	f	g	h	i	j	k	l
		31/12/2024											
Breakdown by sector - NACE 4 digits level (code and label)		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
			Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (WTR)		Of which environmentally sustainable (WTR)
1	B.19.20	2,053	25	-	-	-	-	-	-	-	-	-	-
2	C.20.42	1,320	-	-	-	-	-	-	-	-	-	-	-
3	C.21.20	550	-	-	-	-	-	-	-	-	-	-	-
4	C.22.11	1,583	507	-	-	-	-	-	-	-	-	-	-
5	C.24.10	218	-	-	-	-	-	-	-	-	-	-	-
6	C.27.33	326	16	-	-	-	-	-	-	-	-	-	-
7	C.27.90	616	370	-	-	-	-	-	-	-	-	-	-
8	C.28.92	496	-	-	-	-	-	-	-	-	-	-	-
9	C.29.32	619	1	-	-	-	-	-	-	-	-	-	-
10	C.30.11	626	-	-	-	-	-	-	-	-	-	-	-
11	C.30.91	570	36	-	-	-	-	-	-	-	-	-	-
12	C.30.99	240	29	-	-	-	-	-	-	-	11.76	-	-
13	C.32.50	327	-	-	-	-	-	-	-	-	-	-	-
14	C.32.99	279	-	-	-	-	-	-	-	-	-	-	-
15	C10.11	1,190	-	-	-	-	-	-	-	-	-	-	-
16	C15.11	1,978	-	-	-	-	-	-	-	-	-	-	-
17	C21.20	250	-	-	-	-	-	-	-	-	-	-	-
18	C22.11	604	193	-	-	-	-	-	-	-	-	-	-
19	C24.41	2,053	2	-	-	-	-	-	-	-	-	-	-
20	C26.40	756	-	-	-	-	-	-	-	-	-	-	-
21	C27.10	1,081	649	-	-	-	-	-	-	-	-	-	-
22	C27.31	1,467	190	-	-	-	-	-	-	-	-	-	-
23	C29.10	510	-	-	-	-	-	-	-	-	-	-	-
24	C29.31	656	-	-	-	-	-	-	-	-	-	-	-
25	C30.30	2,346	86	-	-	-	-	-	-	-	-	-	-
26	D.27.12	330	95	-	-	-	-	-	-	-	-	-	-
27	D.35.11	1,072	114	-	-	-	-	-	-	-	-	-	-
28	D.35.13	1,506	274	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 2 – Turnover [2/4]

		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
Breakdown by sector - NACE4 digits level (code and label)		31/12/2024															
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
			Of which environmentally sustainable (CE)		Of which environmentally sustainable (CE)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	B.19.20	-	-	-	-	-	-	-	-	-	-	-	-	2,053.00	24.64	-	-
2	C.20.42	-	-	-	-	-	-	-	-	-	-	-	-	1,320.00	-	-	-
3	C.21.20	-	-	-	-	-	100.58	-	-	-	-	-	-	550.00	100.58	-	-
4	C.22.11	-	-	-	-	-	-	-	-	-	-	-	-	1,583.00	506.56	-	-
5	C.24.10	-	-	-	-	-	-	-	-	-	-	-	-	218.00	-	-	-
6	C.27.33	-	-	-	-	-	-	-	-	-	-	-	-	326.00	15.65	-	-
7	C.27.90	-	-	-	-	-	-	-	-	-	-	-	-	616.00	369.60	-	-
8	C.28.92	-	-	-	-	-	-	-	-	-	-	-	-	496.00	-	-	-
9	C.29.32	-	-	-	-	-	-	-	-	-	-	-	-	619.00	0.62	-	-
10	C.30.11	-	-	-	-	-	-	-	-	-	-	-	-	626.00	-	-	-
11	C.30.91	-	-	-	-	-	-	-	-	-	-	-	-	570.00	35.74	-	-
12	C.30.99	-	0.72	-	-	-	0.24	-	-	-	-	-	-	240.00	41.28	-	-
13	C.32.50	-	-	-	-	-	-	-	-	-	-	-	-	327.00	-	-	-
14	C.32.99	-	-	-	-	-	-	-	-	-	-	-	-	279.00	-	-	-
15	C10.11	-	-	-	-	-	-	-	-	-	-	-	-	1,190.00	-	-	-
16	C15.11	-	-	-	-	-	-	-	-	-	-	-	-	1,978.00	-	-	-
17	C21.20	-	-	-	-	-	-	-	-	-	-	-	-	250.00	-	-	-
18	C22.11	-	-	-	-	-	-	-	-	-	-	-	-	604.00	193.28	-	-
19	C24.41	-	-	-	-	-	-	-	-	-	-	-	-	2,053.00	2.05	-	-
20	C26.40	-	-	-	-	-	-	-	-	-	-	-	-	756.00	-	-	-
21	C27.10	-	-	-	-	-	-	-	-	-	-	-	-	1,081.00	648.60	-	-
22	C27.31	-	-	-	-	-	-	-	-	-	-	-	-	1,467.00	189.50	-	-
23	C29.10	-	-	-	-	-	-	-	-	-	-	-	-	510.00	-	-	-
24	C29.31	-	-	-	-	-	-	-	-	-	-	-	-	656.00	-	-	-
25	C30.30	-	409.08	-	-	-	-	-	-	-	-	-	-	2,346.00	495.10	-	-
26	D.27.12	-	-	-	-	-	-	-	-	-	-	-	-	330.00	95.04	-	-
27	D.35.11	-	-	-	-	-	-	-	-	-	-	-	-	1,072.00	113.77	-	-
28	D.35.13	-	-	-	-	-	-	-	-	-	-	-	-	1,506.00	273.78	-	-



follows: TEMPLATE 2 – Turnover [3/4]

		a	b	c	d	e	f	g	h	i	j	k	l
Breakdown by sector - NACE 4 digits level (code and label)	31/12/2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		
		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (WTR)		Of which environmentally sustainable (WTR)	
29	D35.11	2	-	-	-	-	-	-	-	-	-	-	-
30	D35.20	2,045	810	-	-	-	-	-	-	-	-	-	-
31	E36.00	1,399	149	-	-	-	-	-	-	-	370.18	-	-
32	E38.21	3,488	294	-	-	-	-	-	-	-	83.40	-	-
33	E38.11	4,661	-	-	-	-	-	-	-	-	-	-	-
34	F42.11	934	832	-	-	-	-	-	-	-	-	-	-
35	F43.21	1,402	252	-	-	-	35.47	-	-	-	-	-	-
36	G.46.39	162	-	-	-	-	-	-	-	-	-	-	-
37	G.47.59	400	-	-	-	-	-	-	-	-	-	-	-
38	G47.11	31,760	-	-	-	-	-	-	-	-	-	-	-
39	G47.72	4,377	-	-	-	-	-	-	-	-	-	-	-
40	H.49.39	7,670	-	-	-	-	-	-	-	-	-	-	-
41	H.52.23	1,439	1,085	-	-	-	-	-	-	-	-	-	-
42	H.53.20	1,548,517	17,034	-	-	-	-	-	-	-	-	-	-
43	H49.50	661	172	-	-	-	-	-	-	-	-	-	-
44	H52.10	2,505	3	-	-	-	-	-	-	-	-	-	-
45	H53.20	1,515,802	16,674	-	-	-	-	-	-	-	-	-	-
46	I56.10	997	-	-	-	-	-	-	-	-	-	-	-
47	I56.10	5,263	-	-	-	-	-	-	-	-	-	-	-
48	J.58.13	705	-	-	-	-	-	-	-	-	-	-	-
49	J61.10	8,218	-	-	-	-	1.89	-	-	-	-	-	-
50	J62.01	2,257	-	-	-	-	-	-	-	-	-	-	-
51	M.71.11	242	16	-	-	-	-	-	-	-	-	-	-
52	N.78.10	10,764	-	-	-	-	-	-	-	-	-	-	-
53	N.81.29	5,748	5	-	-	-	-	-	-	-	-	-	-
54	N.82.99	4,872	180	-	-	-	14.27	-	-	-	32.49	-	-
55	S96.09	4,598	616	-	-	-	-	-	-	-	14.95	-	-

ENVIRONMENTAL INFORMATION

		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
Breakdown by sector - NACE4 digits level (code and label)		31/12/2024															
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
			Of which environmentally sustainable (CE)		Of which environmentally sustainable (CE)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
29	D05.11	-	-	-	-	-	-	-	-	-	-	-	-	1.69	-	-	-
30	D05.20	-	-	-	-	-	-	-	-	-	-	-	-	2,045.00	809.82	-	-
31	E36.00	-	-	-	-	-	-	-	-	-	-	-	-	1,399.00	518.75	-	-
32	E38.21	-	5.11	-	-	-	1.70	-	-	-	-	-	-	3,488.00	383.80	-	-
33	E38.11	-	-	-	-	-	-	-	-	-	-	-	-	4,661.00	-	-	-
34	F42.11	-	-	-	-	-	-	-	-	-	-	-	-	934.00	831.82	-	-
35	F43.21	-	-	-	-	-	-	-	-	-	-	-	-	1,402.00	287.83	-	-
36	G.46.39	-	-	-	-	-	-	-	-	-	-	-	-	162.00	-	-	-
37	G.47.59	-	-	-	-	-	-	-	-	-	-	-	-	400.00	-	-	-
38	G47.11	-	-	-	-	-	-	-	-	-	-	-	-	31,760.00	-	-	-
39	G47.72	-	-	-	-	-	-	-	-	-	-	-	-	4,377.00	-	-	-
40	H.49.39	-	-	-	-	-	-	-	-	-	-	-	-	7,670.00	-	-	-
41	H52.23	-	-	-	-	-	-	-	-	-	-	-	-	1,439.00	1,085.01	-	-
42	H53.20	-	-	-	-	-	-	-	-	-	-	-	-	1,548,516.73	17,033.68	-	-
43	H49.50	-	-	-	-	-	-	-	-	-	-	-	-	661.00	171.86	-	-
44	H52.10	-	-	-	-	-	-	-	-	-	-	-	-	2,505.00	3.26	-	-
45	H53.20	-	-	-	-	-	-	-	-	-	-	-	-	1,515,802.29	16,673.83	-	-
46	I56.10	-	-	-	-	-	-	-	-	-	-	-	-	997.00	-	-	-
47	I66.10	-	-	-	-	-	-	-	-	-	-	-	-	5,263.00	-	-	-
48	J.58.13	-	-	-	-	-	-	-	-	-	-	-	-	705.00	-	-	-
49	J61.10	-	-	-	-	-	-	-	-	-	-	-	-	8,218.00	1.89	-	-
50	J62.01	-	-	-	-	-	-	-	-	-	-	-	-	2,257.00	-	-	-
51	M.71.11	-	0.05	-	-	-	-	-	-	-	-	-	-	242.00	16.53	-	-
52	N.78.10	-	-	-	-	-	-	-	-	-	-	-	-	10,764.00	-	-	-
53	N.81.29	-	-	-	-	-	-	-	-	-	-	-	-	5,748.00	4.60	-	-
54	N.82.99	-	1.99	-	-	-	0.66	-	-	-	-	-	-	4,872.00	229.83	-	-
55	S96.09	-	0.92	-	-	-	0.31	-	-	-	-	-	-	4,598.00	631.69	-	-



TEMPLATE 2 – Capex [1/4]

		a	b	c	d	e	f	g	h	i	j	k	l
		31/12/2024											
Breakdown by sector - NACE 4 digits level (code and label)		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
			Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (WTR)		Of which environmentally sustainable (WTR)
1	B.19.20	2,053	301.79	-	-	-	-	-	-	-	-	-	-
2	C.20.42	1,320	-	-	-	-	-	-	-	-	-	-	-
3	C.21.20	550	-	-	-	-	-	-	-	-	-	-	-
4	C.22.11	1,583	538.22	-	-	-	-	-	-	-	-	-	-
5	C.24.10	218	-	-	-	-	-	-	-	-	-	-	-
6	C.27.33	326	21.84	-	-	-	-	-	-	-	-	-	-
7	C.27.90	616	492.80	-	-	-	-	-	-	-	-	-	-
8	C.28.92	496	-	-	-	-	-	-	-	-	-	-	-
9	C.29.32	619	14.24	-	-	-	-	-	-	-	-	-	-
10	C.30.11	626	-	-	-	-	-	-	-	-	-	-	-
11	C.30.91	570	88.12	-	-	-	-	-	-	-	-	-	-
12	C.30.99	240	66.48	-	-	-	-	-	-	-	58.80	-	-
13	C.32.50	327	-	-	-	-	-	-	-	-	-	-	-
14	C.32.99	279	-	-	-	-	-	-	-	-	-	-	-
15	C10.11	1,190	39.63	-	-	-	-	-	-	-	-	-	-
16	C15.11	1,978	54.30	-	-	-	-	-	-	-	-	-	-
17	C21.20	250	-	-	-	-	-	-	-	-	-	-	-
18	C22.11	604	205.36	-	-	-	-	-	-	-	-	-	-
19	C24.41	2,053	47.22	-	-	-	-	-	-	-	-	-	-
20	C26.40	756	-	-	-	-	-	-	-	-	-	-	-
21	C27.10	1,081	864.80	-	-	-	-	-	-	-	-	-	-
22	C27.31	1,467	421.78	-	-	-	-	-	-	-	-	-	-
23	C29.10	510	-	-	-	-	-	-	-	-	-	-	-
24	C29.31	656	-	-	-	-	-	-	-	-	-	-	-
25	C30.30	2,346	235.49	-	-	-	54.54	-	-	-	-	-	-
26	D.27.12	330	211.53	-	-	-	-	-	-	-	-	-	-
27	D.35.11	1,072	419.61	-	-	-	-	-	-	-	-	-	-
28	D.35.13	1,506	686.88	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 2 – Capex [2/4]

	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
	31/12/2024															
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Of which environmentally sustainable (CE)		Of which environmentally sustainable (CE)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	B.19.20	-	-	-	-	-	-	-	-	-	-	-	2,053.0	301.8	-	-
2	C.20.42	-	-	-	-	-	-	-	-	-	-	-	1,320.0	-	-	-
3	C.21.20	-	-	-	-	-	16.35	-	-	-	-	-	550.0	16.4	-	-
4	C.22.11	-	-	-	-	-	-	1,583.0	-	-	-	-	1,583.0	538.2	-	-
5	C.24.10	-	-	-	-	-	-	-	-	-	-	-	218.0	-	-	-
6	C.27.33	-	-	-	-	-	-	-	-	-	-	-	326.0	21.8	-	-
7	C.27.90	-	-	-	-	-	-	-	-	-	-	-	616.0	492.8	-	-
8	C.28.92	-	-	-	-	-	-	-	-	-	-	-	496.0	-	-	-
9	C.29.32	-	-	-	-	-	-	-	-	-	-	-	619.0	14.2	-	-
10	C.30.11	-	-	-	-	-	-	-	-	-	-	-	626.0	-	-	-
11	C.30.91	-	-	-	-	-	-	-	-	-	-	-	570.0	88.1	-	-
12	C.30.99	-	2.16	-	-	-	5.76	-	-	-	-	-	240.0	133.2	-	-
13	C.32.50	-	-	-	-	-	-	-	-	-	-	-	327.0	-	-	-
14	C.32.99	-	-	-	-	-	-	-	-	-	-	-	279.0	-	-	-
15	C10.11	-	-	-	-	-	-	-	-	-	-	-	1,190.0	39.6	-	-
16	C15.11	-	-	-	-	-	-	-	-	-	-	-	1,978.0	54.3	-	-
17	C21.20	-	-	-	-	-	-	-	-	-	-	-	250.0	-	-	-
18	C22.11	-	-	-	-	-	-	-	-	-	-	-	604.0	205.4	-	-
19	C24.41	-	-	-	-	-	-	-	-	-	-	-	2,053.0	47.2	-	-
20	C26.40	-	-	-	-	-	-	-	-	-	-	-	756.0	-	-	-
21	C27.10	-	-	-	-	-	-	-	-	-	-	-	1,081.0	864.8	-	-
22	C27.31	-	-	-	-	-	-	-	-	-	-	-	1,467.0	421.8	-	-
23	C29.10	-	-	-	-	-	-	-	-	-	-	-	510.0	-	-	-
24	C29.31	-	-	-	-	-	-	-	-	-	-	-	656.0	-	-	-
25	C30.30	-	-	-	-	-	-	2,346.0	-	-	-	-	2,346.0	290.0	-	-
26	D.27.12	-	-	-	-	-	-	-	-	-	-	-	330.0	211.5	-	-
27	D.35.11	-	-	-	-	-	-	-	-	-	-	-	1,072.0	419.6	-	-
28	D.35.13	-	-	-	-	-	-	-	-	-	-	-	1,506.0	686.9	-	-



follows: TEMPLATE 2 – Capex [3/4]

	a	b	c	d	e	f	g	h	i	j	k	l
	31/12/2024											
Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (WTR)		Of which environmentally sustainable (WTR)
29	D35.11	2	-	-	-	-	-	-	-	-	-	-
30	D35.20	2,045	1,654.41	-	-	-	-	-	-	-	-	-
31	E36.00	1,399	395.78	-	-	0.14	-	-	-	661.31	-	-
32	E38.21	3,488	811.03	-	-	-	-	-	-	416.99	-	-
33	E38.11	4,661	-	-	-	-	-	-	-	-	-	-
34	F42.11	934	742.62	-	-	-	-	-	-	-	-	-
35	F43.21	1,402	925.32	-	-	1.40	-	-	-	-	-	-
36	G.46.39	162	-	-	-	-	-	-	-	-	-	-
37	G.47.59	400	-	-	-	-	-	-	-	-	-	-
38	G47.11	31,760	-	-	-	-	-	-	-	-	-	-
39	G47.72	4,377	170.21	-	-	-	-	-	-	-	-	-
40	H.49.39	7,670	-	-	-	-	-	-	-	-	-	-
41	H.52.23	1,439	1,169.91	-	-	-	-	-	-	-	-	-
42	H.53.20	1,548,517	78,974.35	-	-	-	-	-	-	-	-	-
43	H49.50	661	191.69	-	-	-	-	-	-	-	-	-
44	H62.10	2,505	26.30	-	-	-	-	-	-	-	-	-
45	H63.20	1,515,802	77,305.92	-	-	-	-	-	-	-	-	-
46	I.56.10	997	-	-	-	-	-	-	-	-	-	-
47	I56.10	5,263	-	-	-	5,263	-	-	-	-	-	-
48	J.58.13	705	-	-	-	-	-	-	-	-	-	-
49	J61.10	8,218	-	-	-	0.41	-	-	-	-	-	-
50	J62.01	2,257	-	-	-	-	-	-	-	-	-	-
51	M.71.11	242	7.33	-	-	-	-	-	-	-	-	-
52	N.78.10	10,764	-	-	-	-	-	-	-	-	-	-
53	N.81.29	5,748	9.77	-	-	-	-	-	-	-	-	-
54	N.82.99	4,872	555.89	-	-	0.56	-	-	-	162.44	-	-
55	S96.09	4,598	1,058.96	-	-	-	-	-	-	74.73	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: TEMPLATE 2 – Capex [4/4]

		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		31/12/2024															
Breakdown by sector - NACE 4 digits level (code and label)		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
			Of which environmentally sustainable (CE)		Of which environmentally sustainable (CE)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
29	D05.11	-	-	-	-	-	-	-	-	-	-	-	-	1.7	-	-	-
30	D05.20	-	-	-	-	-	-	-	-	-	-	-	-	2,045.0	1,654.4	-	-
31	E36.00	-	0.14	-	-	-	-	-	-	-	-	-	-	1,399.0	1,057.4	-	-
32	E38.21	-	15.32	-	-	-	40.85	-	-	-	-	-	-	3,488.0	1,284.2	-	-
33	E38.11	-	-	-	-	-	-	-	-	-	-	-	-	4,661.0	-	-	-
34	F42.11	-	-	-	-	-	-	-	-	-	-	-	-	934.0	742.6	-	-
35	F43.21	-	-	-	-	-	-	-	-	-	-	-	-	1,402.0	926.7	-	-
36	G.46.39	-	-	-	-	-	-	-	-	-	-	-	-	162.0	-	-	-
37	G.47.59	-	-	-	-	-	-	-	-	-	-	-	-	400.0	-	-	-
38	G47.11	-	-	-	-	-	-	-	-	-	-	-	-	31,760.0	-	-	-
39	G47.72	-	-	-	-	-	-	-	-	-	-	-	-	4,377.0	170.2	-	-
40	H49.39	-	-	-	-	-	-	-	-	-	-	-	-	7,670.0	-	-	-
41	H52.23	-	-	-	-	-	-	-	-	-	-	-	-	1,439.0	1,169.9	-	-
42	H53.20	-	-	-	-	-	-	-	-	-	-	-	-	1,548,516.7	78,974.4	-	-
43	H49.50	-	-	-	-	-	-	-	-	-	-	-	-	661.0	191.7	-	-
44	H62.10	-	-	-	-	-	-	-	-	-	-	-	-	2,505.0	26.3	-	-
45	H63.20	-	-	-	-	-	-	-	-	-	-	-	-	1,515,802.3	77,305.9	-	-
46	I56.10	-	-	-	-	-	-	-	-	-	-	-	-	997.0	-	-	-
47	I66.10	-	-	-	-	-	-	-	-	-	-	-	-	5,263.0	-	-	-
48	J58.13	-	-	-	-	-	-	-	-	-	-	-	-	705.0	-	-	-
49	J61.10	-	-	-	-	-	-	-	-	-	-	-	-	8,218.0	0.4	-	-
50	J62.01	-	-	-	-	-	-	-	-	-	-	-	-	2,257.0	-	-	-
51	M71.11	-	0.92	-	-	-	-	-	-	-	-	-	-	242.0	8.3	-	-
52	N78.10	-	-	-	-	-	-	-	-	-	-	-	-	10,764.0	-	-	-
53	N81.29	-	-	-	-	-	-	-	-	-	-	-	-	5,748.0	9.8	-	-
54	N82.99	-	5.97	-	-	-	15.91	-	-	-	-	-	-	4,872.0	740.8	-	-
55	S96.09	-	2.75	-	-	-	7.32	-	-	-	-	-	-	4,598.0	1,143.7	-	-

ENVIRONMENTAL
INFORMATIONSUSTAINABILITY
STATEMENT

TEMPLATE 3 – Turnover [1/2]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r
% (compared to total covered assets in the denominator)		31/12/2024																	
		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				Circular economy (CE)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling							
	GAR - Covered assets in both																		
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	25.72%	0.98%	-	0.00%	0.00%	0.00%	0.00%	-	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	-
2	Financial undertakings	0.16%	0.01%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	0.00%	-	-	-	-
3	Credit institutions	0.16%	0.01%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	0.16%	0.01%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	0.00%	0.00%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	0.00%	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	0.00%	0.00%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	0.00%	-	-	-	-
17	Loans and advances	0.00%	0.00%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	0.00%	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	-
21	Loans and advances	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	25.56%	0.98%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	25.56%	0.98%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	25.72%	0.98%	-	0.00%	0.00%	0.00%	0.00%	-	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 3 – Turnover [2/2]**

		s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
		31/12/2024														
		Pollution (PPC)					Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
Of which Use of Proceeds		Of which enabling			Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling				
	GAR - Covered assets in both															
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	0.00%	0.00%	-	-	-	-	-	-	25.72%	0.98%	-	0.00%	0.00%	20.37%	
2	Financial undertakings	-	-	-	-	-	-	-	-	0.16%	0.01%	-	-	-	0.49%	
3	Credit institutions	-	-	-	-	-	-	-	-	0.16%	0.01%	-	-	-	0.49%	
4	Loans and advances	-	-	-	-	-	-	-	-	0.16%	0.01%	-	-	-	0.49%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
17	Loans and advances	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	0.00%	0.00%	-	-	-	-	-	-	0.00%	0.00%	-	0.00%	0.00%	0.02%	
21	Loans and advances	0.00%	0.00%	-	-	-	-	-	-	0.00%	0.00%	-	0.00%	0.00%	0.02%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	-	-	-	-	-	-	-	-	25.56%	0.98%	-	-	-	19.68%	
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	25.56%	0.98%	-	-	-	19.68%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	0.00%	0.00%	-	-	-	-	-	-	25.72%	0.98%	-	0.00%	0.00%	56.65%	



TEMPLATE 3 – Turnover (T-1) [1/2]

		a	b	c	d	e	f	g	h	j	k	l	m	n	o	p	q	r
% (compared to total covered assets in the denominator)		31/12/2023																
		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				Circular economy (CE)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)	
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling		
GAR - Covered assets in both																		
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	19.95%	0.48%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	0.00%	-	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UbP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	0.00%	-	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UbP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UbP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UbP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	0.00%	0.00%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	0.00%	0.00%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UbP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	19.94%	0.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	19.94%	0.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	19.95%	0.48%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 3 – Turnover (T-1) [2/2]**

		s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
% (compared to total covered assets in the denominator)		31/12/2024														Proportion of total assets covered
		Pollution (PPC)				Biodiversity and Ecosystems (BO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)						
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			
	<u>GAR - Covered assets in both</u>															
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	-	-	-	-	-	-	-	-	19.95%	0.48%	-	-	-	18.82%	
2	Financial undertakings	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.15%	
3	Credit institutions	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.14%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.01%	
7	Other financial corporations	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.00%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.00%	
17	Loans and advances	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.00%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
21	Loans and advances	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	-	-	-	-	-	-	-	-	19.94%	0.48%	-	-	-	18.58%	
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	19.94%	0.48%	-	-	-	18.58%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.09%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	19.95%	0.48%	-	-	-	74.33%	



TEMPLATE 3 – Capex [1/2]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r
% (compared to total covered assets in the denominator)		31/12/2023																	
		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				Circular economy (CE)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling					
	GAR- Covered assets in both																		
1	Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	25.73%	0.99%	-	0.00%	0.00%	0.00%	0.00%	-	-	0.00	0.00	-	-	0.00	0.00	-	-	
2	Financial undertakings	0.17%	0.01%	-	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	0.17%	0.01%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	0.17%	0.01%	-	-	-	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	0.00%	0.00%	-	-	
21	Loans and advances	0.00%	0.00%	-	0.00%	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	0.00%	0.00%	-	-	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	25.56%	0.98%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	of which loans collateralised by residential immovable property	25.56%	0.98%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	0.22%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	25.73%	0.99%	-	0.00%	0.00%	0.00%	0.00%	-	-	0.00%	0.00%	-	-	0.00%	0.00%	-	-	

SUSTAINABILITY
STATEMENTENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 3 – Capex [2/2]**

% (compared to total covered assets in the denominator)		s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
		31/12/2024														
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						Proportion of total assets covered
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)						
			Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both															
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	0.00	0.00	-	-	-	-	-	-	25.73%	0.99%	-	0.00%	0.00%	20.37%	
2	Financial undertakings	-	-	-	-	-	-	-	-	0.17%	0.01%	-	0.00%	0.00%	0.49%	
3	Credit institutions	-	-	-	-	-	-	-	-	0.17%	0.01%	-	-	-	0.49%	
4	Loans and advances	-	-	-	-	-	-	-	-	0.17%	0.01%	-	-	-	0.49%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.00%	0.00%	-	0.00%	0.00%	0.00%	
17	Loans and advances	-	-	-	-	-	-	-	-	0.00%	0.00%	-	0.00%	0.00%	0.00%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	0.00%	0.00%	-	-	-	-	-	-	0.00%	0.00%	-	0.00%	0.00%	0.02%	
21	Loans and advances	0.00%	0.00%	-	-	-	-	-	-	0.00%	0.00%	-	0.00%	0.00%	0.02%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	-	-	-	-	-	-	-	-	25.73%	0.99%	-	-	-	19.68%	
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	25.73%	0.99%	-	-	-	19.68%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.17%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	0.00%	0.00%	-	-	-	-	-	-	25.73%	0.99%	-	0.00%	0.00%	56.65%	



TEMPLATE 3 – Capex (T-1) [1/2]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r
% (compared to total covered assets in the denominator)		31/12/2023																	
		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				Circular economy (CE)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling		
	GAR - Covered assets in both																		
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	20.00%	0.48%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	0.05%	-	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	0.00%	-	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	0.10%	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	0.10%	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	0.00%	0.00%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	0.00%	0.00%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	19.94%	0.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	19.94%	0.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	20.00%	0.48%	-	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 3 – Capex (T-1) [2/2]**

		s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
		31/12/2024														
% (compared to total covered assets in the denominator)		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						Proportion of total assets covered
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)						
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
	GAR - Covered assets in both															
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	-	-	-	-	-	-	-	-	20.00%	0.48%	-	-	-	18.82%	
2	Financial undertakings	-	-	-	-	-	-	-	-	0.05%	-	-	-	-	0.15%	
3	Credit institutions	-	-	-	-	-	-	-	-	0.05%	-	-	-	-	0.14%	
4	Loans and advances	-	-	-	-	-	-	-	-	0.05%	-	-	-	-	0.14%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0.62%	
7	Other financial corporations	-	-	-	-	-	-	-	-	0.00%	-	-	-	-	0.00%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.10%	-	-	-	-	0.35%	
17	Loans and advances	-	-	-	-	-	-	-	-	0.10%	-	-	-	-	0.35%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
21	Loans and advances	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	-	-	-	-	-	-	-	-	19.94%	0.48%	-	-	-	18.58%	
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	19.94%	0.48%	-	-	-	18.58%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	0.15%	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	8.86%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	8.86%	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	20.00%	0.48%	-	-	-	74.33%	



TEMPLATE 4 – Turnover Flow [1/2]

	a	b	c	d	e	f	g	h	j	k	l	m	n	o	p	q	r
	31/12/2024																
% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				Circular economy (CE)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling		
GAR - Covered assets in both																	
1 Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	16.00%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial undertakings	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21 Loans and advances	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 Households	15.61%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 of w hich loans collateralised by residential immovable property	15.61%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 of w hich building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of w hich motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 Total GAR assets	16.00%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 4 – Turnover Flow [2/2]**

		s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
% (compared to total covered assets in the denominator)		31/12/2024														Proportion of total assets covered
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)						
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			
	GAR - Covered assets in both															
1	Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	-	-	-	-	-	-	-	-	16.00%	0.05%	-	-	-	7.17%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-		-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
20	Non-financial undertakings	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
24	Households	-	-	-	-	-	-	-	-	15.61%	0.05%	-	-	-	7.17%	
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	0.16	0.00	-	-	-	7.17%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	16.00%	0.05%	-	-	-	38.79%	



TEMPLATE 4 – Capex Flow [1/2]

		a	b	c	d	e	f	g	h	j	k	l	m	n	o	p	q	r
% (compared to total covered assets in the denominator)		31/12/2024																
		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				Circular economy (CE)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)							
	Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling			
GAR - Covered assets in both																		
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	9.32%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	9.32%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	9.32%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of w hich building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	9.32%	0.05%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

follows: **TEMPLATE 4 – Capex Flow [2/2]**

		s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
% (compared to total covered assets in the denominator)		31/12/2024														Proportion of total assets covered
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)						
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling		
GAR - Covered assets in both																
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	-	-	-	-	-	-	-	-	9.32%	0.05%	-	-	-	7.17%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-		-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-		-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-		-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-		-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-		-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-		-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-		-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
20	Non-financial undertakings	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-	0.00%	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-		-	-	-	
24	Households	-	-	-	-	-	-	-	-	9.32%	0.05%	-	-	-	7.17%	
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	7.17%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	9.32%	0.05%	-	-	-	38.79%	



TEMPLATE 5 – Turnover Stock

		a	b	c	d	e	f	g	h	i	j	k	l	m
		31/12/2024												
% (compared to total eligible off-balance-sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	30.88%	4.19%	-	0.14%	0.53%	9.58%	0.96%	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		31/12/2024																
% (compared to total eligible off-balance-sheet assets)		Circular economy (CE)				Pollution (PPC)			Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	0.00%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	40.46%	5.15%	-	0.14%	0.53%



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

TEMPLATE 5 – Turnover Flow

	a	b	c	d	e	f	g	h	i	j	k	l	m
	31/12/2024												
% (compared to total eligible off-balance-sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1 Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
	31/12/2024																
% (compared to total eligible off-balance-sheet assets)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)'				
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1 Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



TEMPLATE 5 – Capex Stock

		a	b	c	d	e	f	g	h	i	j	k	l	m
		31/12/2024												
% (compared to total eligible off-balance-sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	30.88%	4.19%	-	0.14%	0.53%	9.58%	0.96%	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		31/12/2024																
% (compared to total eligible off-balance-sheet assets)		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	0.00%	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	30.88%	4.19%	-	0.14%	0.53%

SUSTAINABILITY
STATEMENTENVIRONMENTAL
INFORMATION

TEMPLATE 5 – Capex Flow

		a	b	c	d	e	f	g	h	i	j	k	l	m
		31/12/2024												
% (compared to total eligible off-balance-sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptions (CCA)				Water an marine resource (WTR)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance-sheet assets)		31/12/2024																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional		Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



TEMPLATE 1 Gas & Nuclear – GAR Stock Turnover

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes



SUSTAINABILITY STATEMENT

ENVIRONMENTAL INFORMATION

TEMPLATE 1 Gas & Nuclear – GAR Stock Capex

Nuclear energy related activities		Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

Fossil gas related activities		Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 1 Gas & Nuclear – GAR Flow Turnover

Nuclear energy related activities		Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

Fossil gas related activities		Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 1 Gas & Nuclear – GAR Flow Capex

Nuclear energy related activities		Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

Fossil gas related activities		Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 1 Gas & Nuclear – AuM Turnover

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 1 Gas & Nuclear – AuM Capex

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 1 Gas & Nuclear – FinGar Turnover

Nuclear energy related activities		Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

Fossil gas related activities		Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 1 Gas & Nuclear – FinGar Capex

Nuclear energy related activities		Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

Fossil gas related activities		Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No



TEMPLATE 2 Gas & Nuclear – GAR Stock Turnover

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	19.66	0.00%	19.66	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	99,111,164	0.99%	99,106,653	0.99%	4511	0.00%
8	Total applicable KPI	99,111,184	0.99%	99,106,673	0.99%	4511	0.00%



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 2 Gas & Nuclear – GAR Stock Capex

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.00	0.00%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	99,549,523	0.99%	99,539,147	0.99%	10,376	0.00%
8	Total applicable KPI	99,549,523	0.99%	99,539,147	0.99%	10,376	0.00%



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 2 Gas & Nuclear – GAR Flow Turnover

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	5,445,386	0.05%	5,445,386	0.05%	-	-
8	Total applicable KPI	5,445,386	0.05%	5,445,386	0.05%	-	-



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 2 Gas & Nuclear – GAR Flow Capex

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	5,445,386	0.05%	5,445,386	0.05%	-	-
8	Total applicable KPI	5,445,386	0.05%	5,445,386	0.05%	-	-



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 3 Gas & Nuclear – GAR Stock Turnover

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	19.66	0.00%	19.66	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.05	0.00%	0.05	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.01	0.00%	0.01	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	99,111,164	100.0%	99,106,653	99.995%	4,511	0.005%
8	Total applicable KPI	99,111,184	100.0%	99,106,673	99.995%	4,511	0.005%



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 3 Gas & Nuclear – GAR Stock Capex

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.02	0.00%	0.02	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.01	0.00%	0.01	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	0.00	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	99,549,523	100.0%	99,539,147	100.0%	10,376	0.0%
8	Total applicable KPI	99,549,523	100.0%	99,539,147	100.0%	10,376	0.0%



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 3 Gas & Nuclear – GAR Flow Turnover

		a	b	c	d	e	f
Economic activities		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	5,445,386	100.0%	5,445,386	100.0%	0.00	0.00%
8	Total applicable KPI	5,445,386	100.0%	5,445,386	100.0%	0.00	0.00%



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 3 Gas & Nuclear – GAR Flow Capex

		a	b	c	d	e	f
Economic activities		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	5,445,944	100%	5,445,944	100%	0.00	0.00%
8	Total applicable KPI	5,445,944	100%	5,445,944	100%	0.00	0.00%



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 4 Gas & Nuclear – GAR Stock Turnover

Economic activities		a	b	c	d	e	f
		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	765.54	0.00%	765.54	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	741.53	0.00%	741.53	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	21.94	0.00%	21.94	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	2,478,776,714	24.7%	2,478,754,174	24.7%	22,540	0.00%
8	Total applicable KPI	2,478,778,243	24.7%	2,478,755,703	24.7%	22,540	0.00%



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 4 Gas & Nuclear – GAR Stock Capex

Economic activities	a	b	c	d	e	f
	Amount and percentage (present information in monetary amounts and percentages)					
	Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
	Amount	Percentage	Amount	Percentage	Amount	Percentage
1 Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2 Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3 Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4 Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,274.06	0.00%	1,274.06	0.00%	-	0.00%
5 Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	112.62	0.00%	112.62	0.00%	-	0.00%
6 Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	44.89	0.00%	44.89	0.00%	-	0.00%
7 Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	2,478,555,885	24.7%	2,478,532,919	24.7%	22,966	0.00%
8 Total applicable KPI	2,478,557,317	24.7%	2,478,534,351	24.7%	22,966	0.00%



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

TEMPLATE 4 Gas & Nuclear – GAR Flow Turnover

		a	b	c	d	e	f
Economic activities		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	94.08	0.00%	94.08	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	149.15	0.00%	149.15	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4.23	0.00%	4.23	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	928,100,920	9.26%	928,100,909	9.26%	11	0.00%
8	Total applicable KPI	928,101,168	9.26%	928,101,157	9.26%	11	0.00%



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

TEMPLATE 4 Gas & Nuclear – GAR Flow Capex

		a	b	c	d	e	f
Economic activities		Amount and percentage (present information in monetary amounts and percentages)					
		Total (CCM + CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	43	0.00%	43	0.00%	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	10	0.00%	10	0.00%	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	11	0.00%	11	0.00%	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	928,101,409	9.26%	928,101,405	9.26%	4	0.0%
8	Total applicable KPI	928,101,472	9.26%	928,101,468	9.26%	4	0.0%



TEMPLATE 5 Gas & Nuclear – GAR Stock Turnover

	Economic activities	a	b
		Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	58.98	0.0%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7,371,119,795	73.55%
8	Total applicable KPI	7,371,119,854	73.55%


SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

TEMPLATE 5 Gas & Nuclear – GAR Stock Capex

		a	b
Economic activities		Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
2	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
3	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	19.66	0.00%
4	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
5	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.08	0.00%
6	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7,371,119,834	73.55%
8	Total applicable KPI	7,371,119,854	73.55%



TEMPLATE 5 Gas & Nuclear – GAR Flow Turnover

	Economic activities	a	b
		Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
2	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
3	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
4	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
5	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
6	Taxonomy-aligned economic activities (denominator) - Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7,371,119,854	73.55%
8	Total applicable KPI	7,371,119,854	73.55%



SUSTAINABILITY STATEMENT

ENVIRONMENTAL INFORMATION

TEMPLATE 5 Gas & Nuclear – GAR Flow Capex

		a	b
Economic activities		Amount	Percentage
1	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
2	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
3	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
4	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
5	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
6	Taxonomy-aligned economic activities (denominator) -Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7,371,119,854	73.55%
8	Total applicable KPI	7,371,119,854	73.55%



E1 – CLIMATE CHANGE

Strategy

E1-1 – Transition plan for climate change mitigation At present, the Group has not yet defined a transition plan compliant with the ESRS requirements. However, the Group will assess the possibility of developing a plan, based on detailed analyses and consistent with company strategy, within the time span of the 2025-2027 Strategic Plan.

E1 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model The Group has identified the risks and opportunities that have or can be expected to have a material influence on its development, on its financial asset-based situation, on the economic result and on cash flows, in the short, medium or long term. In the area of climate risks, an in-depth assessment was carried out, identifying both physical and transition risks. Although the overall climate risk of the Group's customers is low, some sectors have been identified, such as agriculture, which present a high transition risk even though it does not represent a particularly material part of the Bank's total assets. In summary, the following risks and opportunities were identified:

▪ **Material Risks:**

- ***Climate Change Mitigation:*** credit risk (understood as transition risk) linked to regulatory developments and accelerated and potentially disorderly macroeconomic changes related to the pursuit of the reduction of CO₂ emissions;
- ***Energy:*** credit risk (understood as transition risk) linked to regulatory developments on energy consumption and new methods of energy production and consumption. The portfolio of residential mortgages with collateral properties in energy classes from D to G presents a risk of future depreciation. In this case, this is the transition risk that impacts the future value of the collateral properties.

▪ **Material Opportunities:**

- ***Climate Change Mitigation and Adaptation:*** the customers' growing awareness to sustainability issues represents an extremely significant opportunity for the Group to define the characteristics of products and services, with the potential to generate positive cash flows. In particular, the following products linked to these opportunities were identified:
 - **Finanziamento Green:** strengthening of the offering of green loan products, including, for example, green real estate mortgages. The growth of the green mortgage market is favoured by the evolution of regulations regarding green homes and by the increase in demand from retail consumers interested in the purchase or renovation of high energy-efficiency properties;
 - **Insurance Products:** promotion of insurance products to protect against climate and environmental risks.

Therefore, the Bank has to manage a credit risk related to regulatory developments and accelerations in macroeconomic dynamics, paying particular attention to sectors relevant to the climate. In addition, prolonged exposure to chronic physical risks could



interrupt operational continuity and negatively affect the financial performance of customers, consequently increasing their risk of default. In parallel, regulations and economic changes are affecting the supply chain, with the potential to cause disruptions and additional costs. The Bank has already begun the integration of considerations relating to credit risk and the evolution of climate regulations into its strategy and decision-making processes.

Currently, the Group is implementing various strategies to manage credit risk linked to climate regulations. In particular, elements of physical and transition risk were integrated into the credit rating assessment process for corporate counterparties through an update of the Credit Policies. This update is the result of analyses and assessments relating to the impact of the climate score and the exposure of the Bank's portfolio to physical and transition risk, as well as the integration of an ESG Score in the assessment of counterparties. In addition, valuations regarding collateral properties were integrated, with particular attention to EPC (Energy Performance Certificate) and physical risk. This approach makes it possible to limit the disbursement of loans to sectors and Customers with a high climate risk, thus ensuring that the portfolio remains resilient in the face of climate change. Similarly, a gradual restructuring of the portfolio of residential mortgages is envisaged in order to obtain real estate assets as collateral that are characterized by higher energy classes and, consequently, by reduced risk of devaluation in the medium/long term. During this period, further changes to the corporate strategy will be planned to adapt to regulatory developments and changing economic conditions, and new sustainable financial products and services will be developed to meet consumers' needs and improve competitiveness. Lastly, financial education and sustainability programmes will be organized by the Bank in order to raise customers' awareness of ESG issues.

For more details on the resilience analysis, understood as an analysis carried out on major risks based on various climate scenarios that may arise in the future, please refer to section E1 IRO-1.

Impacts, risks and opportunities management

With regard to the analysis of the impacts, these are considered material for both perspectives: that of Company operations and that of Business activities. Consequently, the impacts deriving from the Group's operations, such as the energy consumption of offices and branches, and from business activities are taken into consideration.

In fact, the Group recognizes that its activities and its business model can generate greenhouse gas (GHG) emissions, both directly through its energy consumption (Scope 1 and 2) and indirectly through its upstream and downstream activities (Scope 3).

The greenhouse gas emissions generated by the direct operations of Banca di Asti, Pitagora and We Finance are rather limited, also taking into account the fact that these companies belong to a sector with a low climate impact. However, considering the presence of Immobiliare Maristella within the consolidated perimeter, which operates in a sector with a high climate impact for its real estate business, it was decided to

E1 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

increase the scores associated with the variables analysed in the Double Materiality process. This is because the impact of this activity could be significant for climate change mitigation. It is also important to underline that, with regard to the impact relating to the "Energy" sub-topic, the Group is actively contributing to the green transition, since Banca di Asti, Pitagora and We Finance exclusively use energy from renewable sources for their internal consumption.

The table below shows the impacts that emerged from the Double Materiality exercise, with an indication, for each impact, of the type, time horizon and segments of the value chain affected.

ESRS – Sub- topic	Description of the impact	Type of impact	Impact direction	Time horizon	Value chain
E1 – Climate Change <i>Climate change mitigation</i>	Impact on ecosystems, people and the economy due to the occurrence of extreme climate events related to greenhouse gas emissions.	Actual	Negative	Short, medium, long-term	Company operations
E1 – Climate Change <i>Climate change mitigation</i>	Impact linked to loans to individuals for the purchase of properties whose energy performance has an impact on climate change	Actual	Negative	Short, medium, long-term	Business activities
E1 – Climate Change <i>Energy</i>	Impact related to the consumption of electricity which, fuelled for the most part by the combustion of fossil fuels, produces large quantities of greenhouse gases such as carbon dioxide, methane and nitrous oxide, which contribute to climate change and have a negative impact on the environment	Actual	Negative	Short, medium, long-term	Company operations

The table below illustrates the mapping of climate change risks, with an indication of the time horizon and the segments of the value chain affected, in correlation with the most directly affected business processes identified within the Group taxonomy, and with the related main controls put in place.


SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

ESRS – <i>Sub-topic</i>	Risk rationale	Time horizon	<i>Value chain</i>	Main business processes impacted	Main controls identified
E1 – Climate Change <i>Climate change mitigation</i>	Credit risk (transition risk) Credit risk linked to regulatory developments and accelerated and potentially disorderly macroeconomic changes related to the pursuit of the reduction of CO ₂ emissions, with particular reference to climate-relevant sectors	Medium, long-term	Business activities	<ul style="list-style-type: none"> Management and maintenance of real estate Energy and plant management Credit disbursement services Commercial planning and development Product portfolio management 	<ul style="list-style-type: none"> Guidelines on environmental issues in the Group Policies on Credit Ongoing activities aimed at integrating sustainability aspects into the processes linked to the disbursement of credit Expansion of the range of ESG credit products for customers Loans to support energy redevelopment Presence of Group Sustainability Policies Use of the Climate Change Risk component for the assessment and monitoring of the Customer portfolio
E1 – Climate Change <i>Energy</i>	Credit risk (transition risk) Credit risk linked to regulatory developments on energy consumption (e.g. Green Homes Directive) and/or to new methods of energy production and consumption that reduce greenhouse gas emissions	Medium, long-term	<i>Business activities</i>		

The table below illustrates the mapping of climate change opportunities with an indication of the time horizon and the segments of the value chain affected. In order to identify these opportunities, an analysis was carried out aimed at enhancing the Bank's strategic planning, assessing the growing interest of the markets in sustainable financial products and considering the regulatory evolution underway. Similar to the risk assessment, the Group has adopted a qualitative approach for the definition of the scores relating to magnitude and likelihood. In addition, each opportunity was associated with a specific ESRS, thus ensuring alignment with current regulations and

ENVIRONMENTAL
INFORMATIONSUSTAINABILITY
STATEMENT

greater transparency in reporting. The Group is actively and positively contributing to the green transition by strengthening the offering of green loan and insurance products to help Customers achieve their sustainability objectives.

ESRS – <i>Sub-topic</i>	Description of the opportunity	Time horizon	Value chain
E1 – Climate Change <i>Climate change mitigation</i>	Strengthening of the offering of green loan products, including, for example, green real estate mortgages. The growth of the green mortgage market is driven by the evolving legislation on Green Homes and the growing demand from retail consumers interested in the purchase/renovation of high energy-efficiency homes	Medium-term	Business activities
E1 – Climate Change <i>Climate change adaptation</i>	Promotion of the offering of insurance products for protection against climate and environmental risks (e.g. Budget Law)	Medium-term	Business activities

The Group is aware of the increasing importance that climate change represents at global level; in this perspective, it has defined a process aimed at identifying, managing and monitoring the risks associated with it, as well as implementing internal and external initiatives to promote responsible behaviour in this area. To this end, the Group has integrated these risk factors into its general mapping of material risks, identifying the types of "traditional" prudential risks potentially impacted.

These factors were considered as causal elements (risk drivers) capable of affecting exposure to traditional risk categories, and not as additional types of risk with respect to the scope of risks that could potentially be assumed.

In identifying the risk factors material to the Group, the dictates contained in the Supervisory Expectations on climate and environmental risks were also taken as a reference.

In particular, the definition of climate and environmental risks includes two main risk drivers: transition risk and physical risk.

The Group conducted a detailed analysis of the stress scenarios as part of ICAAP 2024 (reference date 31 December 2023), with a time horizon of 2050, to assess the impact of climate and environmental risks, with reference to both physical risk and transition risk, on its credit risk metrics, in particular the Probability of Default (PD) and the Loss Given Default (LGD). This analysis, as part of ICAAP 2024, is compatible with what is described in the other sections of the financial statements.

The quantification of climate and environmental risks, to be understood as an incremental delta of credit risk, assessed prospectively for the two-year period 2024-2025, was done using the advanced AIRB method for the determination of pillar 1 credit risks. The projection for the two-year period 2024-2025 was carried out with a view to climate stress on the AIRB internal risk metrics mentioned:



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

- PD: application of a shift on the central PD values of the rating classes. This incremental shift in Probability of Default, provided by the infoprovder Cerved, derives from a set of proprietary statistical models that consider:
 - the effect of the reference NGFS scenario (Orderly or Hot House);
 - the impact of the climate transition on the economic and financial variables and on the FSI (Financial Sustainability Index) debt sustainability indicator of counterparties;
- LGD: estimate of the devaluation of the properties used as collateral deriving from the physical risk to which the property is exposed according to the data provided by the infoprovder Cerved. The new value of the property thus determines a change in the prospective loan to value (LTV) of the credit exposure, a variable considered by the LGD AIRB model, consequently influencing the LGD value associated with the individual relationship.

These scenarios require the authorities to promptly adopt active policies to support the transition and for companies to invest in reducing emissions in line with the objectives of the Paris agreements, to eliminate net emissions by 2050.

In the orderly scenario, the climate risk associated with credit exposures can be quantified in terms of an increase in risk-weighted assets of approximately EUR 58 million in 2024 and approximately EUR 59 million in 2025, with a significant decrease in the shortfall component of approximately EUR 3.8 million in 2024 and approximately EUR 3.5 million in 2025.

In the hot house scenario, the climate risk associated with credit exposures can be quantified in terms of an increase in risk-weighted assets of approximately EUR 26 million in 2024 and approximately EUR 20 million in 2025, with a significant decrease in the shortfall component of approximately EUR 3 million in 2024 and 2025.

In terms of direct impact on the income statement, the quantification of climate risk can be estimated in terms of higher value adjustments on loans for approximately EUR 5 million.

In addition, the climate and environmental risk component was also introduced in the prospective idiosyncratic stress scenario, a scenario that assumes the joint occurrence of a series of independent events. For the ESG area, a geographically localized material atmospheric event was considered, with damage to the properties guaranteeing the Bank's loans and an impact for some specific sectors that are more sensitive to the transition risk in the event of a significant climate change. In summary, the following was calculated:

- a total loss of value of the collateral properties located in the provinces of Genoa, Savona and Imperia due to a sudden extreme weather event. Liguria is an area with a high physical risk and is material for Banca di Asti;
- a sudden and unexpected transition to non-performing of counterparties that present a "high" or "very high" transition risk (in Banca di Asti's credit portfolio, exposures with "high" and "very high" transition risk account for a total of 14%, and 58% of this is represented by exposures to the agricultural sector) dedicated to the cultivation of cereals, rice and grapes which, based on the internal rating assigned to them, were in the medium-high to high risk range as at 31 December 2023.

ENVIRONMENTAL
INFORMATIONSUSTAINABILITY
STATEMENT

The results of the stress analysis indicated that, despite the assumed increase in PD and LGD, the overall exposure to climate risks remains limited. This is due to the low materiality of high climate risk sectors on the overall portfolio. The assessment confirmed that the Bank is not exposed to material climate risks that could compromise financial stability in the medium/long term. However, climate risks will be monitored continuously and risk management strategies will be adapted to ensure the resilience of the business model.

The results obtained must be assessed considering the exceptional nature of the conditions on which the analysis conducted is based. In fact, the stress scenarios, being non-ordinary, have produced overall moderate results for the Group's exposures in relation to climate risks, unlike the results of the Double Materiality analysis, which take place under "normal" conditions, and therefore have highlighted the issue of climate change as material both from the perspective of company operations and of business activities.

Lastly, it should be noted that no business activities considered incompatible with the transition were identified.

**E1-2 – Policies related
to climate change
mitigation and
adaptation**

The Cassa di Risparmio di Asti Group has adopted the Group Sustainability Policies to define the management of potential impacts, risks and opportunities in relation to the sub-topics "Climate change mitigation", "Climate change adaptation" and "Energy". The Group considers the environment a primary asset for the community and the territory and therefore, in the exercise of its activities, is committed to contributing to its protection by taking into account direct and indirect environmental impacts and promoting a sustainable business through optimizing the use of resources, as well as reducing consumption and waste. The Group is therefore committed to planning a direct and indirect environmentally sustainable transition in order to mitigate the risks associated with a disorderly and late transition, such as reputational risk, credit risk, liquidity risk and market risk, and to leverage the related opportunities.

Also for this purpose, the Group periodically monitors its direct and indirect emissions levels and undertakes to reduce them. These objectives are periodically monitored and reported to the Board of Directors.

With regard to direct environmental impacts, the Group establishes the correct behaviour of all those who operate in its name and on its behalf or simply in its interest or advantage, in order to contribute to the protection and safeguarding of the environment. Specifically, this objective is particularly pursued through the following actions:

- encouraging energy savings measures, also for the remodelling of offices and branches;
- favouring the use of renewable energy sources;
- monitoring the effects of activities through the collection and analysis of environmental data, in order to optimize the related impacts and adopt the best solutions aimed at protecting the environment.



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

The Sustainability Plan is a document that aims to outline the strategic guidelines and medium/long-term targets of the Group for all areas of sustainability considered a priority for the integration of ESG factors into its business models and in its operations.

The 2022-2024 Sustainability Plan also included initiatives aimed at supporting climate change mitigation and adaptation. In particular, initiatives were implemented in 2024 to reduce the climate impacts related to the Group's activities. These include the installation of photovoltaic panels at an owned property for the production of renewable energy, the construction of a photovoltaic field within the area served by the primary substation of the Asti headquarters, the conversion of the company car fleet to hybrid/electric power supply, the installation of electric charging columns and recharging stations that can be used to power company cars, the creation of smart branches with remote control to monitor energy consumption, the purchase of energy generated from renewable sources and reduction of plastic use thanks to the extension of the water points at Pitagora's branches.

Banca di Asti has also decided to strengthen its offering of loan products and services to support local communities in the transition to a zero-emission economy. To this end, it introduced new products, such as the mortgage "Mutuo Green Taxonomy aligned" (GAR Approved), the "... Muoviamoci con Erbavoglio" loan dedicated to the purchase of hybrid and full electric vehicles, and the "Sustainability-Loan Imprese", a mortgage designed for companies that make investments to improve their sustainability profile and which allows the company to obtain a benefit linked to the loan, signing the commitment to achieve specific targets (KPIs) in the ESG area. In addition, targets have been defined to integrate ESG risk factors into the various phases of the credit process, such as the inclusion of physical and transition risk in the credit rating assessment process for corporate counterparties. The Group has also achieved targets related to digitalization, extending remote digital signature to all products offered and dematerializing 70% of contracts and accounting operations.

As a demonstration of its willingness to make a significant contribution to environmental sustainability, in 2023 Banca di Asti obtained the UNI EN ISO 14001: 2015 Environmental Certification, making a concrete commitment to monitor and limit direct and indirect environmental impacts, to pursue the reduction of its emissions, and to encourage recycling and sustainable behaviours. The standard defines an "Environmental management system" as part of the company management system aimed at managing the environmental aspects, meeting the obligations of legislative compliance and addressing and assessing material risks and opportunities. In order to ensure timely monitoring of direct impacts, with the aim of reducing them, the Parent Company uses an Environmental Management System (EMS), whose fundamental principles and commitments are outlined in the relevant Guidelines.

The Group is also attentive to indirect environmental impacts, originating from activities and behaviours that are not directly controllable as they are carried out by third parties subjects with whom the Group interacts, such as Customers and Suppliers (included in the value chain). In this regard, the Group is aware of the importance of identifying, managing and monitoring the risks deriving from its investment and loan decisions in a structured and continuous manner in order to

**E1-3 – Actions and
resources in relation
to climate change
policies**

ENVIRONMENTAL
INFORMATIONSUSTAINABILITY
STATEMENT

mitigate the impacts that may derive from them, as well as to act directly on the supply chain through information and awareness-raising policies on environmental sustainability issues.

The Group aims to contribute to the mitigation of climate change by guaranteeing, through products and services, adequate support to people and companies in their environmentally sustainable transition to a low-carbon economy.

The Group also intends to promote climate change adaptation by the subscription and placement of insurance products aimed at covering damages deriving from the occurrence of one or more physical risks.

The actions indicated are adequately supported by the resources provided by the Group to ensure their correct implementation.

To consult the 2022-2024 Sustainability Plan, with reference to the environmental objectives and targets set for 2024, please refer to section ESRS 2.

Metrics and targets

E1-4 – Targets related to climate change mitigation and adaptation

In line with its strategic policies, the Group defines specific objectives relating to climate change mitigation and adaptation, aimed at reducing negative impacts, enhancing positive impacts and managing material risks and opportunities.

The constant monitoring of the pre-established objectives is a fundamental activity to ensure their full achievement within the established times and to make any remedial actions. For more details on the Sustainability Plan, please refer to section ESRS 2.

Below are the targets defined in relation to climate change, in accordance with the provisions of the 2025-2027 Sustainability Plan. These targets reflect the principles and values expressed in the Code of Ethics and in the Group Sustainability Policies according to which "the Group wants to be an active partner in the transition towards a production and consumption model that pursues the objectives of environmental neutrality, respect for human rights and good corporate governance for the benefit of the People, Companies and Communities in which it operates"

ESRS – Sub-topic	Target	Final target	Base year and Base value	Achievement year	Actions	Perimeter
E1 – Climate Change <i>Climate change mitigation</i>	Promote the reallocation of own financial resources towards private initiatives that improve the climate and environmental impact	2.2% of green loans (i.e. eligible) on the stock of loans relating to the private segment	<ul style="list-style-type: none"> Base year: 31/12/24 Base value: 1.4% of green loans (i.e. eligible) on the stock of loans relating to the private segment 	2027	Expansion of the commercial offering of loan products with solutions that contribute to improving the sustainability profile of the counterparty (e.g. sustainable loans for individuals)	Banca di Asti


**SUSTAINABILITY
STATEMENT**
**ENVIRONMENTAL
INFORMATION**

E1 – Climate Change <i>Climate change mitigation</i>	Promote the reallocation of own financial resources towards private initiatives that improve the climate and environmental impact	4.0% of green loans (i.e. eligible) on the stock of loans relating to the SME/SB segment	<ul style="list-style-type: none"> Base year: 31/12/24 Base value: 0.2% of green loans (i.e. eligible) on the stock of loans relating to the SME/SB segment 	2027	Expansion of the commercial offering of loan products with solutions that contribute to improving the sustainability profile of the counterparty (e.g. sustainable loans for companies, Sustainability-linked Loans with ESG KPIs)	Banca di Asti
E1 – Climate Change <i>Climate change mitigation</i>	Promote the reallocation of own financial resources towards private initiatives that improve the climate and environmental impact	7.9% of the Bank's total bond issues in sustainable bond issues	<ul style="list-style-type: none"> Base year: 31/12/24 Base value: 0.0% of the Bank's total bond issues in sustainable bond issues 	2027	Placement of one or more sustainable bond issues and evolution of the commercial offering of sustainable investment products	Banca di Asti
E1 – Climate Change <i>Climate change adaptation</i>	Support to customers for the reduction of the impacts of climate change	Inclusion in the Product Catalogue of at least one NAT/CAT insurance product	<ul style="list-style-type: none"> Base year: 31/12/24 Base value: absence of insurance products in the Catalogue dedicated to covering catastrophic risks 	2027	Development of partnerships to expand the offering of insurance products to cover the impacts associated with Climate & Environmental risks (e.g. NAT-CAT products/product components)	Banca di Asti
E1 – Climate Change <i>Energy</i>	Reduction of consumption and of use of non-renewable sources	Continuation of the commitment to purchase electricity from 100% renewable sources	<ul style="list-style-type: none"> Base year: 31/12/24 Base value: purchase of all electricity consumed by the Group from 100% renewable sources 	2025	Maintenance of existing contracts that provide for the supply of electricity from 100% renewable sources	Group

ENVIRONMENTAL
INFORMATIONSUSTAINABILITY
STATEMENT**E1-5 – Energy
consumption and mix**

As regards the procurement of electricity, since 1 January 2023, Banca di Asti has supplied itself exclusively with energy produced 100% from renewable sources, certified by the Green Energy option, which ensures its origin with a guarantee issued by Gestore dei Servizi Energetici GSE S.p.A. Since 2024, Pitagora has also purchased 100% of its electricity supply from fully renewable sources, with the subsequent issue by the supplier of an annual certification on eco-friendly consumption. As regards the properties owned by the Group and rented to third parties, it is not possible to carry out a direct check of the energy supply choices. Consequently, there is no guarantee that these properties are supplied with energy from renewable sources.

The electricity produced by Banca di Asti derives from the photovoltaic systems installed at Agenzia 9, from the new wing of the Headquarters in Asti and from photovoltaic panels leased at a property owned by the Bank (located in Via Guerra in Asti).

The energy consumption of the Cassa di Risparmio di Asti Group for the year 2024 is summarized below.

Energy consumption and mix (in MWh)

Energy consumption and mix	31/12/2024	UoM
a) Total energy consumption from fossil sources (MWh)	13,152	MWh
Share of fossil sources in total energy consumption (%)	67%	MWh
b) Consumption from nuclear sources (MWh)	-	MWh
Share of consumption from nuclear sources in total energy consumption (%)	0%	MWh
c) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0	MWh
d) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	6,397	MWh
e) Consumption of self-generated non-fuel renewable energy (MWh)	39	MWh
f) Total energy consumption from renewable sources (MWh) (sum of lines 8 to 10)	6,435	MWh
Share of renewable sources in total energy consumption (%)	33%	MWh
g) Total energy consumption (MWh) (sum of lines 6 and 11)	19,587	MWh

Within the Cassa di Risparmio di Asti Group is Immobiliare Maristella, which operates in sector L - Real estate activities that falls under high climate impact sectors, as



SUSTAINABILITY STATEMENT

ENVIRONMENTAL INFORMATION

defined in sections A to H and section L of Annex I to Regulation (EC) 1893/2006 of the European Parliament and the Council (as defined in Commission Delegated Regulation (EU) 2022/1288). The energy consumption of Immobiliare Maristella for the year 2024 is summarized below.

Energy consumption and mix: high climate impact sector

Energy consumption and mix in the high climate impact sector	31/12/2024	UoM
1) Fuel consumption from coal and coal products (MWh)	-	MWh
2) Fuel consumption from crude oil and petroleum products (MWh)	-	MWh
3) Fuel consumption from natural gas (MWh)	603	MWh
4) Fuel consumption from other non-renewable sources (MWh)	-	MWh
5) Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources (MWh)	94	MWh
6) Total energy consumption from fossil sources (MWh) (sum of lines 1 to 5)	697	MWh
Share of fossil sources in total energy consumption (%)	82%	MWh
7) Consumption from nuclear sources (MWh)	-	MWh
Share of consumption from nuclear sources in total energy consumption (%)	-	MWh
8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	-	MWh
9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	152	
10) Consumption of self-generated non-fuel renewable energy (MWh)	-	
11) Total energy consumption from renewable sources (MWh) (sum of lines 8 to 10)	152	
Share of renewable sources in total energy consumption (%)	18%	
12) Total energy consumption (MWh) (sum of lines 6 and 11)	849	


ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

Energy intensity compared to net revenue for high climate impact sectors

Energy intensity compared to net revenue for high climate impact sectors	31/12/2024	UoM
Total energy consumption (MWh) (sum of lines 6 and 11)	849	MWh
Immobiliare Maristella Net Revenue	1,163,014	EUR
Energy intensity compared to revenue for high climate impact sectors	0.0007303	MWh/ Euro

For a better understanding of the data presented, the following table highlights the financial statements items included in the "total net revenues" category of Immobiliare Maristella, which operates in high climate impact sectors.

Financial statements items		31/12/2024
A.	Value of production	1,320,352.90
C.	Financial income and charges	(157,339.16)

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

With regard to own emissions (Scope 1 and 2), in this report it is not possible to make comparisons with historical data, in consideration of the changes introduced by the CSRD and the expansion of the perimeter implemented in 2024, which led to the alignment of the perimeter of Sustainability Reporting with that of the Financial Report. Furthermore, additional categories were included in the reporting of Scope 1 and 2 emissions, namely cars for mixed use and owned properties leased to third parties¹.

In addition, compared to previous years, the Group has implemented the calculation of the emissions of some Scope 3 categories, in particular 1 "Purchased goods and services", 6 "Business travel" and 15 "Investments".

The methodologies, main assumptions and the factors employed to calculate the gross emissions relating to the various Scopes 1, 2 and 3 are presented below, together with the reasons that justify the choices made for each relevant category. In general, the calculation methods are inspired by the GHG Corporate Accounting and Reporting Standard of the Greenhouse Gas Protocol and have been integrated with the ABI Lab Guidelines. The versions of the ABI Lab Guidelines adopted are the most recent ones available at the time of publication of the report, with reference to the year indicated in the table.

¹ The approach adopted by the Group is compliant with what is reported in the EFRAG IG2 Value Chain Implementation Guidance, which specify that the assets included among the Group's assets contribute to the emissions in Scope 1 and 2. However, it should be noted that at the time of disclosure, different reporting approaches are observed (inclusion in Scope 3 emissions) and more clarifications are expected from the regulator.

**Scope 1**

The emissions deriving from the use of fuel for company cars for both business and personal use were estimated by allocating the kilometres travelled to the engine capacity brackets indicated by the ABI Lab Guidelines, based on the distribution of the car fleet. The emissions factors [kgCO₂eq/km] were calculated as the average of the values associated with the technologies of the respective engine capacity brackets. For cars that are mixed use, 70% of the total km were considered as driven for work purposes. For the cars on which it was possible to find the registration document, the emission factor provided directly by the car manufacturer was used.

The energy consumption of Banca di Asti properties is classified into three main categories: (i) leased properties; (ii) non-leased properties; (iii) branches, offices and accommodations rented as fringe benefits.

For leased properties, in cases where it was not possible to obtain electricity and methane gas bills, consumption was estimated. If the property had an Energy Performance Certificate (EPC), the consumption indicated by the energy certifier was used. In the absence of EPC, the average non-renewable Global Energy Performance index (EPgl, nren) extracted from the SIAPE platform was used. This index measures the total annual energy consumption per square meter of surface area. By multiplying this value by the surface area of the property, the total consumption was obtained, subsequently divided between 30% electricity and 70% methane gas, applying the conversion factor of 9.45 kWh/Sm³ for the transformation into energy measurement units.

Non-leased properties were considered to have zero consumption, as they do not have active utilities.

For the branches, offices and accommodations rented as fringe benefits, the consumption reported in the invoices of the energy suppliers was used.

For the properties owned by Immobiliare Maristella, the reporting methodology follows the same principles described above, with the exception of some properties for which the company also acts as a condominium administrator, directly managing consumption.

For the properties of Pitagora, the same methodology adopted for Banca di Asti is applied.

Scope 2

The calculation methods adopted and the conversion factors used are those published by the ABI Lab Guidelines. Specifically, ABI Lab refers to the factors published by ISPRA in the document "Fattori di emissione per la produzione e il consumo di energia elettrica in Italia (1990-2022)" [Emissions factors for the production and consumption of electricity in Italy (1990-2022)]. The Location-Based approach quantifies emissions based on the average emissions factors of electricity production for defined locations within local, sub-national or national boundaries, the value of which is 307.28 gCo₂/Kwh. With regard to the calculation of Market-Based Scope 2 emissions, for Banca di Asti and Pitagora, since guarantees of origin are available for 100% of electricity supplies, the value applied to consumption was 0 gCo₂/Kwh, while



for the remaining supplies for which there is a standard contract, the 2024 Residual Mix factor for Italy was applied, equal to 500.57 gCo2/Kwh.

Scope 3

The Cassa di Risparmio di Asti Group is in the first year of reporting on its Scope 3 emissions. In the case of the metrics relating to Scope 3 emissions, which include data estimated on the basis of indirect sources, such as data on sector averages or other proxy variables, the accuracy of the data depends on the quality and specificity of the sources used. These values are averages and derive from an estimate based on secondary data, and therefore may not accurately reflect company specificities. Also in this case, the accuracy of the estimates depends on the representativeness of the sample and the quality of the data used. In general, the reliability of these metrics depends on the robustness of the indirect data sources, which, although useful for obtaining an overall overview, may not reach the same level of precision as the direct metrics.

The calculation of Scope 3 emissions is based on the principles of the GHG Protocol and the ABI Lab Guidelines. Also following the analysis of the categories included by the Group's peers, the categories shown below were identified as material.

Category 1 - Purchased goods and services (Paper)

Emissions related to purchased goods and services are limited to those deriving from paper consumption. For the purposes of the calculation, emissions factors from the ExioBase Database were applied, taking into consideration the expense items related to paper and cardboard consumption in the Income Statement of the individual companies that make up the Group.

Category 6 - Business travel

Category 3.6 includes emissions related to business travel by Employees, considering the following means of transportation:

- train;
- aircraft;
- short-term rental cars;
- private cars of Employees.

The data relating to business travel was calculated using a distance-based method. The distance travelled for each trip was calculated and, by multiplying the results obtained by the emissions factors of DEFRA relating to the various means of transportation, the total GHG emissions for the Cassa di Risparmio di Asti Group were quantified.

For reimbursements for which no specific mileage is available, an average distance of 64.1 km was estimated. This value was estimated as the average of the mileage recorded for other reimbursements with personal vehicles, excluding data with a frequency of less than 0.1%, in order to improve the quality of the estimate.

Category 15 - Investments

The calculation of Category 15 of Scope 3 of the Cassa di Risparmio di Asti Group is done according to the Global GHG Accounting and Reporting Standard for the



Financial Industry of the Partnership for Carbon Accounting Financials (PCAF). To date, the PCAF has defined specific calculation methodologies for seven types of financial instruments:

- Listed equity & Corporate bonds: shares and corporate bonds listed on regulated markets with generic purposes (i.e., for bonds the reference is to "unknown use of proceeds");
- Business loans and unlisted equity: investments in shares of companies not listed on the regulated market, loans, and credit lines with generic purposes (i.e., for loans the reference is to "unknown use of proceeds");
- Project Finance: investments and loans in favour of projects or activities with specific purposes (i.e., known use of proceeds);
- Commercial Real Estate: loans intended for the purchase and/or refinancing of properties used for commercial purposes;
- Mortgages: loans for the purchase and refinancing of residential properties (hereinafter also "Residential Real Estate");
- Motor vehicle loans: loans and credit lines to businesses and/or consumers to finance one or more motor vehicles;
- Sovereign debt: sovereign bonds and sovereign loans issued in domestic or foreign currency.

The PCAF calculation methodology envisages a general principle valid for all categories of financial instruments listed above, which includes the following elements:

- 1) the emissions factor is defined as the share of total annual GHG emissions of the asset/project or counterparty subject of the investment/loan;
- 2) the attribution factor is calculated by determining the share of the residual amount of a financial institution's loans and investments with respect to the total equity and debt of the company and the asset/project to which the financial institution has granted a loan or in which capital has been invested;
- 3) the financed emissions are always calculated by multiplying an attribution factor (specific for that asset class) by the emissions of the specific asset/project or of the counterparty, whose formula is indicated below:

$$\text{Financed Emissions} = \sum i \text{ Attribution factor} * \text{Absolute Emissions (tCO}_2\text{e)}$$

$$\text{where Attribution factor} = \text{Outstanding amount (€)} / \text{Total Equity} + \text{Debt (€)}.$$

For the year 2024, the following categories were considered: Listed equity & Corporate bonds, Business loans and unlisted equity, Commercial Real Estate, Mortgages, Sovereign debt. It should be noted that loans with known "use of proceeds" other than Commercial Real Estate and Residential Real Estate (attributable to the PCAF asset classes "Motor Vehicle Loans" and "Project Finance") were excluded from the scope of the calculation as they were absent.

In particular, the following portfolios were considered at the Group level:

- owned portfolio: the portfolio analysed is composed exclusively of sovereign securities for which the value of the exposure, the GHG emissions relating to


ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

the reference countries², and the GDP-PPP Adjusted of the country are used as calculation variables;

- portfolio of receivables from corporate counterparties: the Group has based the calculation of its financed Scope 1, 2 and 3 emissions by collecting the necessary information on the counterparties (including with the support of an external supplier);
- real estate portfolio: these are considered loans attributable to the "Mortgages" and "Commercial Real Estate" categories envisaged by the PCAF standard, with the exclusion of properties under construction and renovation. In the absence of specific data, the emissions factors provided by the PCAF were used with reference to Scope 3;
- portfolio of assets under management: the portfolio analysed is composed of both direct investments in UCI for which the Scope 1, 2 and 3 emissions were collected by an external supplier, and sovereign securities for which the same calculation methodology represented above is applied.

With a view to increasing the quality of the data and reporting, the Group intends to improve the reliability of specific information in the coming reporting years. This will be possible through greater collaboration with suppliers and the expansion of the number of categories reported. In this way, the intention is to reduce the uncertainty in the data provided and expand the reporting scope of emissions relating to this category.

Below are the total GHG emissions, disaggregated by Scope 1, Scope 2 and by the significant categories of Scope 3.

Total GHG emissions disaggregated by Scope 1, Scope 2 and by significant categories of Scope 3

Emissions	31/12/2024	UoM
Scope 1 greenhouse gas emissions		
<i>Gross Scope 1 greenhouse gas emissions</i>	2,263.79	tCo2e
Scope 2 greenhouse gas emissions		
<i>Gross location-based Scope 2 greenhouse gas emissions (tCO2eq)</i>	2,610.60	tCo2e
<i>Gross market-based Scope 2 greenhouse gas emissions (tCO2eq)</i>	586.38	tCo2e
Significant Scope 3 greenhouse gas emissions		
<i>1. Purchased goods and services (paper)</i>	188.63	tCo2e
<i>6. Business travel</i>	490.59	tCo2e

² DataBase of the UNFCCC.



**SUSTAINABILITY
STATEMENT**

**ENVIRONMENTAL
INFORMATION**

15. Investments	2,510,068.35	tCo2e
Total greenhouse gas emissions		
Total greenhouse gas emissions (location-based) (tCO2eq)	2,515,621.96	tCo2e
Total greenhouse gas emissions (market-based) (tCO2eq)	2,513,597.74	tCo2e

The GHG intensity rate based on net revenue is shown below.

GHG intensity rate based on net revenue

Intensity of total GHG emissions	31/12/2024	UoM
Intensity of total gross location-based GHG emissions (referring to the consolidated accounting group [parent company and subsidiaries])	2.998600552	tCo2e /EUR
Intensity of total gross market-based GHG emissions (referring to the consolidated accounting group [parent company and subsidiaries])	2.996187700	tCo2e /EUR
Net revenue used to calculate GHG intensity		
Total net revenue (from the financial statements)	838,932.00	EUR

For a better understanding of the data presented, the following table highlights the financial statements items included in the category "total net revenues".

Financial statements items		31/12/2024
10.	Interest income and similar revenues	524,463
40.	Fee and commission income	179,722
70.	Dividends and similar income	10,387
80.	Net profit (loss) from trading	90,922
90.	Net profit (loss) from hedging	1,256
100.	Gains (losses) on disposal or repurchase of:	(4,566)
	a) financial assets measured at amortised cost	(18,159)
	b) financial assets measured at fair value through other comprehensive income	14,742
	c) financial liabilities	(1,149)
110.	Net profit (loss) from other financial assets and liabilities measured at fair value through profit or loss	137



ENVIRONMENTAL
INFORMATION

SUSTAINABILITY
STATEMENT

	a) financial assets and liabilities designated at fair value	109
	b) other financial assets mandatorily measured at fair value	28
230.	Other operating expenses/income	36,881
280.	Gains (losses) on disposal of investments	(270)

Again with reference to total GHG emissions, the expansion of the reporting scope has led for the first time to the inclusion of properties owned by the Group that are rented to third parties in the calculation of Scope 1 and Scope 2 emissions, resulting in a significant increase of total emissions. For a clearer and more transparent representation of the Group's emission impact, the table below shows the total Scope 1 and 2 GHG emissions over which the Group has operational control. These emissions therefore exclude the Group's assets that are leased to third parties.

Total GHG emissions disaggregated by Scope 1 and Scope 2 with the exclusion of assets owned by the Group and rented to third parties

Emissions	31/12/2024	UoM
Scope 1 greenhouse gas emissions		
<i>Gross Scope 1 greenhouse gas emissions</i>	2,058.60	tCo2e
Scope 2 greenhouse gas emissions		
<i>Gross location-based Scope 2 greenhouse gas emissions (tCO2eq)</i>	2,281.44	tCo2e
<i>Gross market-based Scope 2 greenhouse gas emissions (tCO2eq)</i>	3.2	tCo2e

The biogenic emissions of CO₂ deriving from the combustion or bio-degradation of biomass, biofuels, biogas or other Scope 1 bioenergy sources consumed by the Group are equal to 0 tCO₂e.

With regard to Scope 3, emissions are reported limited to the following categories:

- 3.1: Purchased goods and services;
- 3.6: Business travel;
- 3.15: Investments.

The other categories were excluded from the calculation as they were not material for the Group's operations. In general, the categories defined as "upstream" by the ABI Lab Guidelines for which the data necessary for the calculation were available were preferred.

With regard to the "downstream" categories, the Group reports exclusively category 15, relating to investments. The remaining categories are excluded due to irrelevance with respect to the Group's core business (categories 9, 10 and 11) or due to the absence of Franchises (category 14).



SUSTAINABILITY
STATEMENT

ENVIRONMENTAL
INFORMATION

At the time of publication of this Sustainability Reporting, there are no active GHG emission mitigation projects financed with carbon credits within the Group.

E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

At the time of publication of this Sustainability Reporting, the calculation of internal carbon pricing was not developed, mainly because this activity is not in line with the Group's core business.

E1-8 – Internal carbon pricing



S1 – OWN WORKFORCE

Strategy

S1 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Every year, during the Double Materiality analysis process, Employees and Collaborators are involved with the aim of identifying the main material impacts for the Group, as defined in the section ESRS 2 IRO-1. The link between the Employees and the company strategy generates a virtuous circle: the impacts on its workforce identified by the Group derive mainly from the company strategic guidelines. The latter firmly highlight the importance and centrality of human capital, considered a fundamental element for the Group's development and a distinctive factor in the creation of a long-term competitive advantage.

The Group's own workforce has the opportunity, through surveys, to assess the materiality of impacts previously identified by the Group's reference functions. The result of this involvement is integrated into the Double Materiality analysis and communicated to the Collegial Bodies, the Risk and Sustainability Committee and the Board of Directors, which take it into account for the approval of the results of the Double Materiality analysis and, more generally, in the orientation of the company strategy.

The feedback received from internal Stakeholders highlighted the materiality of all impacts related to the sub-topics of ESRS S1.

The table below shows the impacts that emerged from the Double Materiality exercise, with an indication, for each impact, of the type, time horizon and segments of the value chain affected.

ESRS – Sub-topic	Description of the impact	Type of impact	Impact direction	Time horizon	Value chain
S1 – Own workforce <i>Working conditions</i>	Impact of the management of socio-economic conditions and the quality of life of the company population related to the protection of Employees, respect for workers' rights (including balancing private and professional life, adequate wages and stable employment) and the promotion of a healthy and safe work environment, in line with industry standards	Actual	Positive	Short, medium-term	Company operations
S1 – Own workforce <i>Equal treatment and opportunities for all</i>	Impact of Employees' satisfaction and productivity in relation to the working environment, with particular reference to inclusiveness, equal opportunities, diversity and fair remuneration.	Actual	Positive	Short, medium-term	Company operations



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

S1 – Own workforce <i>Other work-related rights</i>	Impact of socio-economic gaps related to the failure to respect basic rights of workers, such as the use of child and forced labour, as well as human rights, such as respect for privacy	Potential	Negative	Short, medium-term	Company operations
---	---	-----------	----------	--------------------	--------------------

As part of the Double Materiality process, no significant risks and opportunities related to the own workforce were identified.

As can be seen from the tables above, the Double Materiality analysis did not identify actual generalized or systemic negative material impacts in the contexts in which the Group operates or related to individual incidents.

In fact, the Group does not have any operations involving a serious risk of forced labour or child labour. The fact that operations are limited to the Italian territory, combined with the highly regulated and supervised financial sector, contribute to limiting the risk of incurring these problems.

Furthermore, at present, a transition plan aimed at reducing negative impacts on the environment and implementing greener and climate-neutral operations has not yet been defined. Therefore, there are no significant impacts on own workforce that may derive from transition plans.

On the other hand, the Double Materiality process showed a potential negative material impact regarding the socio-economic gaps related to the failure to respect basic workers' rights, such as the use of child and forced labour, as well as human rights, such as respect for privacy. Although no evidence of child or forced labour or systematic violations of human rights was found in the Group's operational context, it was considered important to identify this impact as material during the Double Materiality process in order to fully understand the possible implications for Employees, especially with regard to respect for privacy. In this regard, there are no references to specific categories of workers but the entire own workforce is considered.

All own workers may be subject to significant impacts by the company; therefore, all of them are included in the application of ESRS 2 disclosure.

The own workforce of the Cassa di Risparmio di Asti Group is composed of employees divided into executives, managerial staff and personnel, further divided into professional areas, as well as non-employee workers which mainly include contract workers, agents and brokers who form the local sales network.

Specifically, the composition of the staff of the companies of the Cassa di Risparmio di Asti Group is as follows:

- More than 90% of Banca di Asti is made up of Employees with permanent employment contracts, mainly on a full-time basis. The part-time contract is used by 9% of Employees and almost exclusively by women, at their request, to facilitate their return to work after their maternity leave. There is also a residual portion of contract workers.



**SOCIAL
INFORMATION**

**SUSTAINABILITY
STATEMENT**

- Pitagora employs not only workers with an employment contract, distributed among the different sectors of the company organizational chart, but also single-mandate VAT-registered agents, who constitute the direct sales network and carry out the profession of agent in financial activities exclusively on behalf of Pitagora. In addition, there are resources under training in the Academy, with a Co.Co.Co. contract, in order to obtain the qualification to operate as financial agents.

With regard to staff requirements and the consequent recruitment and selection activities, only figures within the company authorized to fill the role are involved. The Company does not make use of the support of third-party companies, except in exceptional cases.

- We Finance employees have an employment contract and are distributed among the various sectors of the company organizational chart. The main part is represented by agents and brokers in financial activities with legal personality, who in turn have the possibility of making use of their own collaborators and/or employees. There is also a residual share of agents in the form of natural persons.

For a description of the activities that have positive impacts, please refer to section ESRS 2 SBM-3.

Impacts, risks and opportunities management

**S1-1 – Policies
related to own
workforce**

The Cassa di Risparmio di Asti Group has adopted specific policies, applied to the entire own workforce, to manage the potential impacts that could affect all workers, as listed below:

- Group Sustainability Policies;
- Policies on Diversity, Equity and Inclusion;
- Code of Ethics and Conduct;
- Remuneration and Incentive policies;
- Guidelines for Health and Safety in the workplace;
- Group Regulation on internal reporting of violations (General Whistleblowing Disclosure).

To ensure that all internal and external Stakeholders can have access to the information, these documents are available for Group Employees in the Regulations section of the company Intranet, while external stakeholders can view them by accessing the institutional website of Banca di Asti.

The policies address the Impacts, Risks and Opportunities (IROs) that emerged as material within the Double Materiality process with regard to issues related to the own workforce, guaranteeing a structured and informed approach in their management. Each of them, based on their area of expertise, contributes to effective management of the socio-economic conditions and quality of life of the company population. This includes the protection of Employees, respect for their rights, the promotion of a healthy and safe working environment, in line with sector standards, with particular reference to inclusiveness, equal opportunities, diversity and fair remuneration, and protection of the basic rights of workers, such as respect for privacy.



According to the provisions of the **Group Sustainability Policies**, the Group promotes the enhancement of people and the protection of human rights in the conduct of its activities and in all relationships that result from them, both in dialogue with Employees and Collaborators, the primary importance of which it recognizes, both in its relationship with Customers and Suppliers, as well as in compliance with the principles of legality, loyalty, correctness and transparency in relations. The Group also promotes participation in the life of the local community and support for the entrepreneurial fabric and families, including through collaboration with public institutions, trade associations and local organizations.

All parties that interact directly with the Group, such as Employees, Shareholders, Customers and Suppliers, are considered the main Stakeholders of the Group Sustainability Policies. However, the scope of these policies also extends to those who can influence or be influenced by the Group's management, such as trade unions, control bodies, sector associations and legislators, and those who, albeit indirectly, could be affected by its activities, such as local communities, public bodies, the media, schools and universities.

The **Policies on Diversity, Equity and Inclusion** define the inspiring principles and areas of intervention established by Banca di Asti to constantly promote the values of diversity, equity and inclusion both within its organizational structure, thus favouring a better working environment for its Employees, as well as externally by supporting the commitment to an inclusive society.

To this end, as part of the management of human resources, the Bank adopts criteria of impartiality, merit, competence, professionalism and the correct assessment of individual skills and potential, guaranteeing the same opportunities and fairness of treatment in recruiting, selection and hiring, in remuneration, in training and development, in work-life balance, in everyday language respectful to all and in internal and external communication.

The Bank firmly intends to protect diversity, considering it a value that fuels creativity, innovation, productivity and the generation of ideas.

The **Code of Ethics and Conduct** of the Cassa di Risparmio di Asti Group is intended to inspire, regulate and preventively control the behaviours that the Recipients, understood as the generality of the subjects with whom the Bank enters into relations for the achievement of its corporate purpose (Shareholders, members of the corporate bodies, Employees, Collaborators, Promoters, etc.), are required to respect.

The Group considers human capital a fundamental resource and is committed to recognizing its merit and professional skills. It promotes constructive relationships with staff that, in line with company objectives, stimulate a sense of belonging, adaptability to change and individual motivation. These principles guide the policies relating to the management of human resources, remuneration and incentives.

The **Remuneration and Incentive Policies** represent a fundamental tool to support the Group's medium and long-term strategies with the aim of achieving – in

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

the interest of all Stakeholders – remuneration systems that are increasingly linked to corporate results, appropriately adjusted to take into account all risks, consistent with the levels of capital and liquidity necessary to support the activities undertaken and, in any case, such as to avoid distorted incentives that could lead to regulatory violations or excessive risk-taking. These Policies, aimed at attracting, motivating and retaining talent, creating a sense of belonging and promoting a culture oriented towards performance and merit, are addressed to the following subjects:

- Members of the Corporate Bodies;
- Identified Staff for the purposes of the risk profile: figures belonging to the Top Management, to the Corporate Control Functions and figures whose professional activity has or may have a material impact for the purposes of the risk profile of the individual Company or the Group;
- Other personnel, such as individuals linked to the Company by an employment relationship and not belonging to the "identified Staff";
- Collaborators, or parties not linked to the Company by employment relationships;
- Credit intermediaries such as financial agents and loan brokers;
- Insurance Intermediaries registered in the "E" register of the RUI.

The key principles, consistent with what is practised in general with respect to the management and development of resources, are: fairness, attention to risk and compliance, prudence, and the valuing of merit. Fairness is understood as the principle of remuneration consistency between comparable roles and responsibilities. The Group is attentive to risk and is always committed to achieving maximum compliance with regulatory requirements to ensure sustainable growth over time.

The Banca di Asti **Guidelines for Health and Safety in the workplace**, based on the provisions of national and EU legislation on the subject, are part of Banca di Asti's "Occupational Health and Safety Management System" (OHSMS), implemented in compliance with the UNI ISO 45001: 2018 standard and whose principles are of reference for the general objectives of company management in this regard. One of the fundamental principles of the OHSMS is to inform all those present in the company (Employees, Suppliers, Customers) about the organization in charge of safety and emergency management, as well as about the risks present and the related prevention and protection rules adopted. The responsibility for guiding the enforcement of these Guidelines lies with all the Bank's Management and their success depends on the constant commitment and respect of all Personnel. In addition, the Guidelines constitute the essential reference point for the definition and review of health and safety objectives, with the aim of achieving continuous improvement, and are available for consultation to anyone who requests them.

The **Group Regulation on internal reporting of violations** (Whistleblowing) has the following objectives:

- preventing offences by defining a system of rules for reporting acts or facts that may constitute a violation of the regulations;
- introducing a transparent process as well as defining the tasks, responsibilities and protection measures of the various corporate players



involved, enabling Employees to be able to carry out their work in a safe environment equipped with the necessary controls, guaranteeing the confidentiality and protection of the personal data of the person making the report and of the person reported;

- provide appropriate disclosure of the procedures that the Group has put in place to allow personnel to report acts or facts that may constitute a violation of the regulations governing banking activity and the other cases envisaged in annex no. 1 of Legislative Decree 24/2023.

In order to comply with regulatory provisions, as well as to implement and spread the culture of legality in all sectors of its organizational structure, the Group has in fact developed an internal system for reporting violations that allows for timely knowledge of different types of crimes, to undertake appropriate measures to maintain the integrity of the company's reputation with benefits in terms of reducing losses from possible damages, to improve the working environment and to promote the company's image.

The Cassa di Risparmio di Asti Group is also committed to respecting and promoting human rights within its workforce, in line with the principles contained in its Code of Ethics and in the Group Sustainability Policies. In the conduct of its business activities, the Group pursues principles of legality, loyalty, fairness and transparency, focusing on the respect and protection of human and workers' rights, as detailed below.

Respect for human rights, including labour and workers' rights

As envisaged in the Group Sustainability Policies, the Group shares and respects the four fundamental rights issued by the International Labour Organization (ILO) as part of the "Declaration on Fundamental Principles and Rights at Work", adopted by the 86th session of the International Labour Conference in Geneva on 18 June 1998. These rights concern the following areas:

- Freedom of association and effective recognition of the right to collective bargaining;
- Elimination of any form of forced labour;
- Effective abolition of child labour;
- Elimination of discrimination in the labour and employment sectors.

The Group pays great attention to respecting the dignity of all Employees and Collaborators, committing itself to guaranteeing wages that meet the minimum requirements and to promoting a system of relations based on constructive dialogue. This approach aims to strengthen the motivation, the sense of belonging and the direct involvement of people within the organization. The Group attaches particular importance to the psycho-physical well-being of its Employees and Collaborators, adopting the necessary measures to ensure high standards of occupational health and safety. The goal is to create work environments that respect individual dignity and are harmonious and safe.



**SOCIAL
INFORMATION**

**SUSTAINABILITY
STATEMENT**

Likewise, the Group undertakes to guarantee the full expression of each Employee and Collaborator, as well as respect for diversity in every phase of the working life of all personnel, and to promote an inclusive work environment where equal opportunities are promoted regardless of gender, race, language, ethnicity, skin colour, disability, sexual orientation and gender identity, economic status, national ancestry, social background, religion, political opinion, trade union membership, age or other personal characteristic, as well as any other form of discrimination envisaged by European Union legislation and national law, taking effective actions to combat any form of discrimination. In particular, it undertakes to avoid any form of discrimination in the processes of selection, recruitment, training, management, development and remuneration of personnel and to spread behaviour in the workplace based on loyalty, collaboration and mutual fairness, combating and condemning any form of sexual harassment and sexism in the workplace, including through the adoption of strict company policies and confidential reporting tools.

To this end, as part of the management of people, the Group adopts criteria of impartiality, merit, competence, professionalism and the correct assessment of individual skills and potential, guaranteeing the same opportunities and fairness of treatment. With particular reference to remuneration, the Group undertakes to apply the principle of equal remuneration for the same work or for work of equal value between men and women and to apply criteria and reporting of remuneration transparency.

In fact, the Group, as expressly established in the Code of Ethics, inspires its activities to the attention and promotion of the individual, and in particular:

- guarantees respect for human dignity;
- combats all forms of discrimination (sexual, religious, ethnic or social, etc.);
- promotes dialogue, interaction and constructive relationships among people;
- encourages the development of human resources, including through professional growth paths;
- guarantees safe and healthy working conditions;
- bans all forms of physical or psychological harassment.

In addition, it promotes continuous training on diversity and inclusion to raise awareness among workers in order to recognize and remove stereotypes and prejudices of all kinds.

These initiatives are part of a broader process aimed at consolidating an ethical and responsible organization, in line with the principles of social sustainability and respect for human rights, thus strengthening the trust and sense of belonging of Employees and Collaborators.

Although the commitment is not formalized within a specific policy, the Group carries out numerous actions aimed at supporting parenting.

The management of leave for the birth or adoption of children takes place in compliance with Italian legislation on maternity leave, which provides for a mandatory period of five months' abstention from work and an optional abstention from work up to a further six months. For the birth of a child, a leave of three working days is also



granted to the father in addition to what is required by law. In all cases of return from maternity leave, new mothers benefit from breastfeeding breaks for the entire period envisaged by the legislation and, if required, the part-time contract; specific training is also provided to facilitate the return to working life, with a course dedicated to new mothers called "Work Life Balance". The objective of the course is to recognize the factors that influence the jobs of new mothers when they return to work, identify the motivational factors that characterize the personal and professional life of each resource and identify the main sources of stress, in order to propose effective alternative solutions. In continuity with previous years, the "Female Leadership" training course dedicated to women who hold positions of responsibility was also offered again, in order to promote a path of self-awareness regarding leadership and identify a new way to manage the managerial role, with particular reference to gender culture.

The Group Sustainability Policies and Policies on Diversity, Equity and Inclusion establish the guiding principles and areas of intervention for continuously promoting the values of diversity, equity and inclusion, both within the organization, creating a more favourable working environment for Employees in which there is an evolved coexistence among differences, combating any form of sexual harassment and sexism, as well as externally, by supporting the commitment to an inclusive society. In this context, in order to enhance its commitment to Employees and Collaborators, Banca di Asti was among the very first Italian banks to achieve, during 2022, and to maintain during the annual revaluation, the UNI PdR 125: 2022 Certification of its Gender Equality Management System. The Commission for Gender Equality was also established in 2023, with the task of promoting, overseeing, managing and monitoring issues related to inclusion, gender equality and integration.

Engaging with own workers

The Group recognizes how fundamental the active engagement of its Employees is in decision-making processes and in the management of company impacts. For this reason, it has adopted a structured approach that includes tools for listening, dialogue and participation, with the aim of creating an inclusive work environment oriented towards the enhancement of people. The Group engages both its own individual workers and trade union representatives, in order to also consider their perspectives in the development of company strategies, in the decision-making processes and in the management of material impacts. For more information on the methods of involving own workers, please refer to section S1-2.

Measures to remediate and/or make it possible to remediate impacts on human rights

The Group is actively committed to creating a working environment that protects human rights and to take all necessary measures to remediate any violations of the rights of its workers. This includes the constant monitoring of the working environment and the adoption of corrective measures if situations arise that may compromise the rights of Employees. The Group also ensures that human rights

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

problems are addressed promptly, listening to workers' reports and collaborating with the competent authorities and trade unions to resolve any dispute.

As part of the prevention policies aimed at protecting its own workforce, the Group considers the psycho-physical well-being of personnel and collaborators to be extremely important; to this end, it adopts all actions deemed necessary to ensure high standards of health and safety, pursuing the aim of ensuring working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current legislation on workplace accident prevention and worker protection. In order to strengthen its commitment to these issues, Banca di Asti adopts an Occupational Health and Safety Management System (OHSMS), implemented in compliance with the UNI ISO 45001:2018 standard, whose fundamental principles are outlined within the Guidelines for Occupational Health and Safety, based on the provisions of national and EU legislation on the subject.

The OHSMS is divided into fundamental principles that include, for example, compliance with Italian and European legislation on occupational health and safety, the communication of company safety guidelines to its Stakeholders and the promotion of prevention activities in order to avoid accidents and occupational diseases. Banca di Asti also undertakes to identify the residual risks present in the workplace, taking the most appropriate measures to eliminate and/or reduce them, through the adoption of innovative methodologies and information supports.

In addition, not only is the training of human resources enhanced to ensure that workers are aware of their responsibilities and the need to comply with current legislation, but constant information on risks, prevention and safety regulations is also promoted, involving all parties present in company environments (Employees, Suppliers and Customers). Suppliers are selected considering health and safety aspects as well, promoting common initiatives for the management and resolution of any risk situations with a view to mutual collaboration.

Lastly, Banca di Asti also promotes the active participation of workers through their Safety Representatives, and is committed to continuous improvement, investing resources to achieve the safety objectives set in the OHSMS. Compliance with the principles of health and safety is considered an essential element in the management of all company activities, including the design and maintenance of plants and buildings.

**S1-2 – Processes for
engaging with own
workers and
workers'
representatives
about impacts**

The Group engages with both its individual workers and trade union representatives in order to also consider their perspectives in the decision-making processes and the management of material impacts. An initial method of direct engagement takes place annually with the administration of an on-line questionnaire aimed at collecting the opinions of internal Stakeholders regarding the materiality of the impacts that emerged from the Double Materiality analysis along the value chain of the Cassa di Risparmio di Asti Group. At the same time, on an annual basis, the Employee performance evaluation process is carried out, which first involves a self-assessment phase aimed at stimulating self-diagnosis, and then a subsequent phase oriented towards discussion between Managers and Collaborators. During the meeting, the strengths and areas of improvement of the annual performance are first analysed and



SUSTAINABILITY
STATEMENT

SOCIAL
INFORMATION

then the person being evaluated is given the opportunity to express any requests/considerations both with respect to the level of current and prospective satisfaction with the role they play, and with respect to any expectations and potential interest in other areas of work. The activity in question, currently applied in Banca di Asti and Pitagora, will also be introduced in We Finance in 2025.

Another engagement tool available to its own workforce is the "HR Desk", which takes the form of interviews at the initiative of the Human Resources Service at the individual organizational units and with "event" involvement at the request of the individual worker. The information collected is then used in the broader scope of human resource management and development processes (for example: job rotation, training, professional development) in line with the company's technical-organizational needs. As regards the involvement of workers' representatives, it is structured within the overall system of industrial relations, which provides for annual/semi-annual meetings on the areas envisaged by the national contract (training, evaluation systems, economic results, etc.) and specific meetings on request. This negotiation allowed the drafting of a Supplementary Company Contract and a Company Memorandum of Understanding that provide for regulatory and economic articles that are improvements with respect to the National Contract, such as forms of supplementary health care and supplementary pension plan.

The highest-level role within each Company, which is responsible for ensuring that the involvement of workers takes place correctly and that the results guide the company's approach, is attributed to the Director of Resources.

In the broader process of engaging its own workforce to guide company decisions, there are also specific agreements between Banca di Asti and the workers' representatives in relation to respect for the human rights of its own workforce.

In Article 1 - "Social Responsibility" of the Memorandum of Understanding, the Parties express their agreement with the content of the Protocol on Sustainable Development and Corporate Social Responsibility, signed by the national parties on 16/06/2004, whose principles are referred to in full. Professional ethics towards Customers and respect for the rights and dignity of workers are fundamental, shared and essential values. These principles are the basis of the company's commitment to guaranteeing respect for human rights within its workforce, in line with the agreements existing between the company and the workers' representatives.

In addition, Banca di Asti has adopted specific measures, such as the establishment of the Commission for Gender Equality and the election of Occupational Safety Representatives (OSR), to better understand the perspectives of its workers who may be particularly vulnerable to impacts and/or marginalized (e.g. women, people with disabilities, etc.).

In the Double Materiality analysis process, with reference to the sub-topic "Other work-related rights", potential negative impacts on the internal workforce were identified, related to the failure to respect basic rights of workers, such as the use of child and forced labour, as well as human rights, such as respect for privacy. To

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

mitigate any negative impacts, the processes impacted and the relative controls were identified; for more details in this regard, please refer to section ESRS 2 GOV-4. In particular, the Group has adopted an Organization and Management Model (pursuant to Legislative Decree 231/2001), which includes a system for reporting violations (Whistleblowing) in compliance with Supervisory regulations. This system is governed by a specific internal procedure (Group Regulation on reporting violations), which allows Employees to report any irregularities. The reports are then sent to the competent bodies of the company to undertake the necessary corrective or disciplinary actions.

The Group has also set up specific channels so that its own workers can share their feedback and communicate their concerns or needs, as detailed in section S1-2.

In addition, any behaviour that is in conflict, even if only potentially, with the provisions of the Group's Code of Ethics and Conduct must be reported to the direct Manager or a member of the General Management of the Group Companies and, in the most important cases, to the Supervisory Body pursuant to Legislative Decree 231 if relating to areas of competence of the same.

The Group establishes suitable communication channels through which reports relating to any violations of the Code can be transmitted.

Those who have submitted the reports are protected from any type of retaliation or act that may constitute a form of discrimination or penalty.

The Group guarantees the adequacy of the communication channels, ensuring that reports relating to alleged violations can be forwarded effectively and securely; it also protects persons who make reports from any form of retaliation, discrimination or penalty. To communicate any concerns or needs related to the identification of hazards, risks or incidents, the "Comunica Whistleblowing" channel is active, which uses IT methods to guarantee the confidentiality of the identity of the reporting person. The process of ascertaining violations of the duties established in the Code is entrusted to the competent corporate control bodies and functions.

Although the IT channel is preferred, reports can also be made through the following methods:

- telephone conversation with the Head of the internal systems for reporting violations (or an alternative contact person);
- direct interview agreed with the Head of the internal systems for reporting violations (or an alternative contact person);
- compilation and submission of the paper reporting form to be addressed to the Head of the internal systems for reporting violations (or an alternative contact person).

The procedures envisaged in the Organization and Management Model also apply to own workforce as there are no specific mechanisms for handling complaints/reports for problems concerning personnel.

For more details on the internal reporting system ("Whistleblowing"), please refer to section G1-1.



The Group adopts specific measures to ensure compliance with company provisions, as well as channels dedicated to the reporting of concerns, guaranteeing their monitoring and the effective protection of people from any retaliation. In particular, the Code of Ethics was approved by the Board of Directors of the Parent Company, after consulting the Supervisory Body pursuant to Legislative Decree 231/01, and was endorsed by the Group Companies by resolution of the respective Boards of Directors, after consulting the respective Supervisory Bodies. Any change or integration requires a similar approval process. The Recipients of the Code are required to strictly comply with the provisions contained therein.

The Corporate Bodies, the Supervisory Body established pursuant to Legislative Decree 231/2001 and the Corporate Control Functions have the task of supervising the enforcement and observance of the Code. The Supervisory Body, in particular, is responsible for:

- expressing opinions regarding ethical-behavioural problems that could arise in the context of company decisions and alleged violations of the Code, including on the basis of reports received or checks carried out;
- monitoring the periodic review of the Code and its enforcement mechanisms, including through the presentation of proposals for adjustments;
- promoting and monitoring initiatives aimed at encouraging the communication and dissemination of the Code to all parties required to comply with the principles and rules of conduct contained therein.

The Internal Audit Function and the Compliance Function, each as part of their respective control activities, monitor the degree of compliance with the provisions of the Code by carrying out periodic audits.

More generally, the Managers of the various Organizational Units pay particular attention to ensuring that the principles and values set out in the Code are respected as part of the activities of the relative structures.

Any behaviour that is in conflict, even if only potentially, with the provisions of the Code must be reported to the direct Manager or to a member of the General Management of the individual Group Companies, and, in the most important cases, to the Supervisory Body pursuant to Legislative Decree 231/01, if relating to areas of competence of the same.

The Group establishes suitable communication channels through which reports of any violations of the Code can be made.

Those who have submitted the reports are protected from any type of retaliation or act that may constitute a form of discrimination or penalty.

The investigation of violations of the duties set forth in the Code is conducted by the competent corporate control bodies or functions of the Bank. For further details, please refer to section G1-1.



SOCIAL
INFORMATION

SUSTAINABILITY
STATEMENT

The Group Companies have also envisaged, in line with Legislative Decree 24/2023, the exposure of the Whistleblowing disclosure in the transparency bulletin board of the operating offices (branches) and in a specific section in the institutional websites where the updated information on the channel, the procedures and the prerequisites necessary to make internal and external reports are published, the relative documentation for sending the report, as well as the dedicated link for transmission via the "Comunica Whistleblowing" platform. Please refer to section G1-1 for more details regarding the communication channels made available to Employees, the methods with which these channels are supported and the procedures for monitoring the reports received.

Lastly, Chapter 6 of the Group Regulation on internal reporting of violations, entitled "Protection Measures", explains the processes adopted by the Group to prevent any retaliation against reporting persons. The identity of the reporting person and any other information from which that identity can be deduced, directly or indirectly, may not be disclosed to persons other than those competent to receive or follow up on the reports without the express consent of the reporting person.

S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

The Group has always been attentive to the well-being of its Employees, and to this end promotes benefits and protections aimed at improving their working conditions. The main corporate welfare initiatives valid for Banca di Asti and Pitagora consist of disbursements relating to the following areas:

- the Supplementary Pension Plan, which provides for a contribution from the employer against a portion paid by the Employee;
- the company welfare platform through which part of the company bonus was paid in June (50%) with the possibility of using numerous services (including "repayment of expenses incurred", "social security", "purchase vouchers", "free time" and "health vouchers") as well as obtaining tax advantages;
- the disbursement of a Meal Voucher for each day of work attendance (also issued to We Finance Employees);
- contracted *smart working* for office personnel.

Banca di Asti supplements its welfare plan with disbursements relating to the following areas:

- health care for all Employees and for tax-dependent family members. Favourable conditions are applied to the spouse and to non tax-dependent children upon payment of the relative shares;
- benefits for the children of Employees, with an additional supplement for children who study away from home;
- benefits for Employees with disabled children;
- the protection of working students with fully paid study permits for exams and theses;
- the degree bonus;



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

- the granting of a commuting allowance, calculated on the basis of the distance between the usual residence/domicile and the workplace, if the same exceeds 20 kilometres;
- favourable conditions on bank charges and commissions, as well as loans with favourable conditions, in line with the best offers on the market;
- the seniority bonus upon completion of 25 and 30 years of service.

Pitagora completes its welfare offering with the following measures:

- flexible entry hours between 8:00 and 10:00 in the morning, lunch break between 12:30 and 15:00 and exit starting from 17:00 for Pitagora office staff;
- the development of a network of agreements at the local and national level with access to discounts reserved for Pitagora Employees.

The Group also actively supports Employee socialization initiatives, including outside working hours, and the promotion of events linked to the territory. In 1978, the Polisportiva Banca di Asti was founded with the aim of involving Banca di Asti Employees in recreational and sports activities. Over time, its initiatives have expanded, and today the association brings together around 800 members. The activities are divided into 11 distinct sections which operate independently as part of a common coordination of the entire Polisportiva, implementing numerous initiatives. Every year, following the reporting of the activities carried out, the Polisportiva, as an amateur sports association, obtains a financial contribution from the company to cover operating costs.

The aforementioned actions, whose application along the value chain is concentrated in the context of own operations, are constantly monitored and updated according to the needs of Employees, in order to prevent and mitigate potential negative impacts on own workforce. At Banca di Asti, any problem reported by Employees regarding these initiatives is brought to the attention of the Company both through the trade union representatives and by the workers who are directly involved, with the aim of identifying a solution together.

During 2022, Banca di Asti was among the very first Italian banks to achieve UNI PdR 125:2022 Certification of its Gender Equality Management System, enhancing its commitment to Employees and Collaborators. UNI/PdR 125:2022 defines the guidelines of a management system for gender equality, i.e. it delimits the issues to be addressed to support women empowerment within company growth paths and at the same time to avoid stereotypes/discrimination and guide the corporate culture so that it can be increasingly inclusive and respectful of women's skills. The assessment process was carried out by the certifying body RINA through the analysis of specific qualitative and quantitative indicators linked to the following six macro-areas: culture and strategy, governance, human resources (HR) processes, opportunities for growth and inclusion of women in the company, pay equity by gender, protection of parenting and work-life balance. Banca di Asti's commitment to equal opportunities and inclusion has resulted in the preparation of the policy document that defines the

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

initiatives envisaged by Regulation UNI/PdR 125:2022, the implementation of which has made it possible to obtain maintenance of the certification during the annual reassessment.

In this context, the Commission for Gender Equality was also established in 2023, with the task of promoting, overseeing, managing and monitoring issues related to inclusion, gender equality and integration. The Commission holds quarterly meetings during which updates of the planned activities are reviewed.

In 2024, the Group did not have to intervene to remediate or allow to remediate actual material negative impacts, as none occurred in the reporting period considered.

The Group is constantly committed to fully respecting the human rights of all parties involved in its operations. With regard to potential negative impacts on the issues of child labour and forced labour, considering its business model and the regulation of the Banking sector, the Group has not currently deemed it necessary to implement specific initiatives. However, it maintains careful monitoring on the issue of work-related rights as highlighted in detail in ESRS 2 GOV-4. Please refer to this section for further details on the correlation between the potential material negative impact emerged from the Double Materiality analysis, the most directly affected business processes identified within the Group taxonomy and the related main controls put in place.

With regard to the protection of the privacy of its Employees, processes have been implemented for the security of information and sensitive data. In order to prevent the occurrence of any security problems in ICT systems and services, specific procedures are defined with the following objectives:

- identify and block potential vulnerabilities, using firewalls, proxies, IPS, network access control and antivirus apps;
- protect the software installed on servers and company PCs, through virtual patching processes and solutions;
- protect network devices to guarantee their integrity and ensure the confidentiality and availability of data. The security aspects regarding the exchange of data between the various Group offices and with third parties must also be guaranteed.

Depending on the importance and risk profiles of the communications, the connections are appropriately given "redundancy" with structures that guarantee service continuity in the event of malfunctions. In order to prevent the loss of data or the unauthorized modification of data and programmes, the Information System managed in outsourcing with Cedacri S.p.A. provides a clear methodology for managing the life cycle of the systems, including business applications and infrastructural systems.

The outsourcer guarantees the separation of the Development, Testing and Production environments, with access to the source code of the programmes limited only to specifically authorized users. It also guarantees the security of information within the



development cycle of information systems, ensuring the protection, also in terms of confidentiality, of the data used for testing the applications.

The software and information are protected from malicious agents such as computer viruses and malware to ensure their integrity. Rules are established and tools are used that limit the installation of software by unauthorized users. The security requirements are systematically guaranteed and any changes to their application are defined in advance of the development, modification and/or implementation of new applications and/or IT systems.

The Group ensures that its practices do not cause or contribute to causing material negative impacts on its own workforce.

In fact, the Group undertakes to maintain professional conduct based on the principles of fairness, morality and honesty, guaranteeing the same ethics in both internal and external relationships, both in physical and digital contexts. To this end, it adopts specific policies, including the Code of Ethics, the Guidelines on Workforce Health and Safety and the Policies on Diversity, Equity and Inclusion, which guide the entire Group's activities.

In particular, the Code of Ethics sets out at the company level the rights, duties, including moral, and internal and external responsibilities of all parties with whom the Group enters into relations, in order to affirm recognized and shared values and behaviours as well as the consequent rules of conduct, including for the purpose of preventing and combating possible offences pursuant to Legislative Decree no. 231 of 8 June 2001. All Recipients of the Code are required to comply with and, insofar as they are responsible, to enforce the principles and rules of conduct contained therein. Under no circumstances does the claim to act in the interest of the Group justify the adoption of conduct contrary to that set out in the Code itself.

Lastly, it should be noted that the management of material impacts takes place through the involvement of all company functions considered relevant for the individual impact identified, which work in close collaboration to define the actions to be implemented and the resources to be allocated.



Metrics and targets

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The Group, based on the needs of its own workforce and in line with its strategic policies, defines specific targets aimed at reducing negative impacts, enhancing positive impacts, and managing material risks and opportunities for its Employees to support their professional growth, constantly maintaining a focus on promoting a healthy work environment.

The Stakeholder engagement process consists of a continuous dialogue with individuals or groups who have an interest in the Group's activities or who could be positively or negatively influenced by them. The objective is to actively engage the main stakeholders, collecting their expectations and concerns in order to integrate them into the company strategy, building and maintaining transparent and collaborative relationships and ensuring the sharing of clear information about the company's activities, choices and impacts.

The Group engaged a sample of Stakeholders, including Employees and Top Management, through an exploratory online survey functional to the preparation of the Group's Double Materiality analysis.

The results of the survey conducted, which asked participants to assess the significance of various impacts on company operations and on the business concerning people and the environment, were taken into consideration also in defining the strategic objectives of the 2025-2027 Sustainability Plan, so that they expressed consistency both with the preferences expressed by the Stakeholders and with the strategic directives of the company.

The constant monitoring of the pre-established objectives is a fundamental activity to ensure their full achievement within the established times and to make any remedial actions. For more details on the Sustainability Plan, please refer to section ESRS 2 GOV-1.

The targets defined in relation to the own workforce, according to the provisions of the 2025-2027 Sustainability Plan, are reported below. These targets reflect the principles and values expressed in the Group Sustainability Policies and in the Code of Ethics, according to which "the Group promotes the enhancement of human assets as its main resource, recognizing merit and professional attitudes and fostering a system of relationships with personnel which, in order to achieve company objectives, nurture individuals' sense of belonging, propensity to change and motivation. These values consistently guide the guidelines of the human resource management policies and those of remuneration and incentives".

These targets reflect the provisions of the Workforce management policies and are an integral part of the sustainability strategy, supporting the growth and well-being of Employees.



SUSTAINABILITY STATEMENT

SOCIAL INFORMATION

ESRS – Sub-topic	Target	Final target	Base year and Base value	Final target year	Actions	Perimeter
S1 – Own workforce <i>Working conditions</i>	Constant monitoring and improvement in the management of social aspects in the areas of health and safety, diversity & inclusion	- Maintenance of the Uni Pdr 125:2022 Gender Equality Certification - Maintenance of the ISO 45001 Worker Health and Safety Certification	<u>Base year:</u> 31/12/24	2025 2026 2027	Oversight, monitoring and continuous streamlining of the processes connected to the management systems subject to certification	Banca di Asti
S1 – Own workforce <i>Equal treatment and opportunities for all</i>	Achievement of substantial pay equity by gender	Average pay gap for the same job category by gender and with equal skills of less than 5% in 2027**	<u>Base year:</u> 31/12/24 <u>Base value:</u> the average pay gap for the same level of job category by gender and with equal skills is not less than 5% in all job categories	2027	Periodic monitoring of diversity and remuneration indicators	Banca di Asti
S1 – Own workforce <i>Other work-related rights</i>	Increase in Employees' knowledge of ESG issues and related awareness	Evolution of the internal, general and specialist training programme, with an increase in ESG-themed training sessions for Employees	<u>Base year:</u> 31/12/24	2025 2026 2027	Assessment of training needs, definition and subsequent provision of training sessions	Group

** Parent Company target

To consult the 2022-2024 Sustainability Plan, with reference to the objectives and targets set for 2024, please refer to section ESRS 2.

None of the metrics shown below have been validated by an external body other than the party issuing the certificate of compliance.

Information on the number of Employees by gender

GENDER	Number of Employees (in number of people)
Men	755
Women	1,133
Other	0
Not communicated	0
Total Employees	1,888

S1-6 – Characteristics of the undertaking's employees

The methodology used for the reporting of the data envisaged as a reference the selection of the precise data of the workforce as at 31 December 2024.



SOCIAL
INFORMATION

SUSTAINABILITY
STATEMENT

The number of Employees is aligned with that reported in section 12.2 of the administrative expenses of the Consolidated Financial Statements.

There were 63 terminations in the year subject to reporting. The turnover rate, which for the reference period is equal to 3%, was calculated by comparing the number of Employees who left the company during the period with the total number of Group Employees as at 31 December 2024.

Information on Employees based on the type of contract, broken down by gender (in number of people)

Men	Women	Other *	Not communicated	Total
Number of Employees (in number of people)				
755	1,133	0	0	1,888
Number of permanent Employees (in number of people)				
752	1,098	0	0	1,850
Number of fixed-term Employees (in number of people)				
3	35	0	0	38
Number of Employees with variable hours (in number of people)				
0	0	0	0	0
Number of full-time Employees (in number of people)				
742	943	0	0	1,685
Number of part-time Employees (in number of people)				
13	190	0	0	203

(*) Gender as specified by the employees themselves

Information on Employees based on the type of contract, broken down by geographical area (in number of people)

EMPLOYEES BY CONTRACT	North West	North East	Central	South and Islands	Total
Permanent contract	1,791	32	9	18	1,850
Fixed-term contract	25	3	6	4	38
Total Employees	1,816	35	15	22	1,888
Variable hours	0	0	0	0	0
Full-time	1,633	31	7	14	1,685
Part-time	183	4	8	8	203
Total Employees	1,816	35	15	22	1,888

**S1-7 –
Characteristics of
non-Employee
workers in the
undertaking's own
workforce**

As at 31 December 2024, the total number of non-Employees was 402.

The methodology used to calculate non-Employee workers envisaged the exact number of external workers as at 31 December 2024.

The types of non-Employee workers are divided as follows:

- Banca di Asti: contract workers;



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

- Pitagora: single-mandate VAT-registered agents that characterize the direct sales network, who carry out the profession of financial agent exclusively on behalf of Pitagora;
- We Finance: agents and brokers in financial activities with legal personality. Each agent/broker may also make use of its own collaborators and/or Employees. Lastly, there is also, to a lesser extent, a share of agents in the form of natural persons.

The National Collective Labour Agreements for the sector cover all Employees of the Cassa di Risparmio di Asti Group, as reported below:

- Number of Employees covered by collective labour agreements: 1,888;
- Total number of Employees: 1,888.

S1-8 – Collective bargaining coverage and social dialogue

The Group operates exclusively in Italy within the EEA and the total percentage of its Employees covered by collective agreements is 100%.

The percentage of Group Employees covered by employee representatives is 87%. The breakdown is provided below:

- Number of Employees working in offices with employee representatives: 1,647;
- Total number of Employees: 1,888;
- Coverage rate: 87%.

There are 5 trade union organizations at Banca di Asti, three of which are confederal (CGIL-CISL-UIL) and two are independent (FABI and UNISIN). Pitagora and We Finance do not have trade union representatives.

Collective bargaining coverage and social dialogue

	COLLECTIVE BARGAINING COVERAGE	SOCIAL DIALOGUE
COVERAGE RATE	Employee workforce – EEA	Representation in the workplace (EEA only)
0-19%	0	0
20-39%	0	0
40-59%	0	0
60-79%	0	0
80-100%	1,888	Italy

There are no agreements with Employees for representation by a European Works Council (EWC), a works council of a European company (EC) or a works council of a European cooperative company (ECC), as required by Italian legislation.

The tables below show the number of senior management broken down by gender and the number of Employees by age group as at 31 December 2024. Senior management refers to the first and second level below the administrative, management and supervisory bodies.

S1-9 – Diversity metrics



SOCIAL
INFORMATION

SUSTAINABILITY
STATEMENT

Distribution of senior management by gender

GENDER	Number of Employees at senior management level	% of Employees at senior management level
Men	25	83%
Women	5	17%
Other	0	0
Not communicated	0	0
Total	30	100%

Distribution of Employees by age group

AGE	Number of Employees	% of Employees
Under 30 years of age	229	12%
Between 30 and 50 years of age	948	50%
Over 50 years of age	711	38%
Total	1,888	100%

S1-10 – Adequate wages All Group Employees receive an adequate wage according to the relevant National Collective Labour Agreement. Second-level bargaining also applies to Employees of Banca di Asti.

S1-11 – Social protection All Employees of the Cassa di Risparmio di Asti Group are covered, through public programmes or services offered by the company, by social protection against loss of income due to illness, unemployment starting from the moment in which the own worker works for the company, work-related accident and acquired disability, parental leave and retirement.

S1-12 – Persons with disabilities The Group employs 102 persons with disabilities, equal to 5% of Employees. A breakdown of the data is provided below:

- Total number of employees: 1,888;
- Number of employees with disabilities: 102
 - of which are men: 42
 - of which are women: 60.

In order to understand the data and the relative compilation methods, it should be noted that the definition of "persons with disabilities" was taken into consideration in line with art. 1 of Law 69/1999 on protected categories.

S1-13 – Training and skills development metrics In the reference reporting period, the average number of training hours per Employee was 49.8 while the average number of training hours by gender was:

- Men: 48.6;
- Women: 50.6.

During the year, Employees subject to periodic performance review receive, on average, an annual evaluation.


**SUSTAINABILITY
STATEMENT**
**SOCIAL
INFORMATION**
Number of reviews in proportion to the number of reviews agreed by management

	Men	Women	Other	Not communicated	Total
Percentage of Employees who participated in periodic performance and career development reviews	89%	91%	0	0	90%

The periodic performance review is envisaged for all Employees of Banca di Asti; for Pitagora and We Finance, it is envisaged for all Employees active as at 31 December of the previous year (in 2024, the review was therefore envisaged and carried out on employees active as at 31/12/2023).

The percentage of workers covered by the health and safety management system for the Cassa di Risparmio di Asti Group is 87%. The breakdown between Employees and non-Employees is shown below:

- Employee Workforce: 100%;
- Non-Employee Workforce: 9%.

The percentage of workers covered by the company's health and safety management system, subject to external audit, is 87%. These metrics are in fact also verified by the Certifying Body RINA, which is responsible for the audit for the maintenance of the Certificate of Compliance with the international standard UNI ISO 45001:2018 for the adoption of the "Occupational Health and Safety Management System - OHSMS" of the operational headquarters and the entire network of branches of Banca di Asti.

During the reporting year, there were no deaths due to work-related injuries or illnesses among employees and non-employees of the Cassa di Risparmio di Asti Group.

In 2024, there were 10 cases of recordable work-related accidents, and the total number of hours worked by own workers was equal to 2,800,429. The workplace accident rate based on 1,000,000 hours worked is equal to 3.47. It should also be noted that four of the accidents recorded are attributable to "commuting" type accidents, i.e. they happened during regular home-work trips.

In 2024, there were no cases of work-related illnesses for the Cassa di Risparmio di Asti Group, nor did it record any cases of recognized/compensated occupational diseases.

For the reporting year, the number of days lost due to work-related injuries caused by work-related accidents was 207.

100% of the Employees of the Cassa di Risparmio di Asti Group have the right to leave for family reasons.

The table below shows the percentage of eligible Employees who have taken leave for family reasons.

S1-14 – Health and safety metrics
S1-15 – Work-life balance metrics

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT**Percentage of eligible Employees who have taken leave for family reasons**

	Men	Women	Other	Not communicated	Total
Percentage of eligible Employees who have taken leave for family reasons	12%	16%	0	0	14%

S1-16 – Compensation metrics (pay gap and total compensation)

The gender pay gap for the Cassa di Risparmio di Asti Group, defined as the difference between the average pay levels paid to female and male workers, expressed as a percentage of the average pay level of male workers, is equal to 21%. It should be noted that this figure was calculated considering the gross hourly remuneration.

The ratio between the total annual remuneration of the person who receives the highest wage and the median total annual remuneration of all Employees (excluding the person with the highest wage) is equal to 26.23. In particular, the basic wage and all remuneration variables (fringe benefits and bonuses) were considered in the calculation.

S1-17 – Incidents, complaints and severe human rights impacts

In 2024, there were no episodes of discrimination, including harassment, or complaints submitted through the provided channels. There was one case of a report by an Employee who submitted comments regarding the use of inappropriate terms during an e-learning course. The Bank promptly activated the remediation processes in order to identify the most suitable actions to understand and subsequently resolve the problem. The supplier, after being contacted by the Bank to remediate the event, modified the slides on the basis of the Bank's suggestions, thus resolving the anomaly.

During the reporting period, there were no serious human rights incidents related to the company's workforce, nor did the Group receive fines, sanctions and requests for compensation for damages resulting from incidents and complaints.



S3 – AFFECTED COMMUNITIES

Strategy

The Double Materiality analysis identified a series of material impacts and opportunities, which are closely intertwined with the Group's business model.

In particular, from the point of view of materiality of impact, exposures to companies that generate an impact on the well-being of local communities through skills development and entrepreneurship projects are of fundamental importance to support the social and economic growth of communities. These initiatives, aimed at strengthening the entrepreneurial and training skills of people, contribute significantly to the enhancement of local economies, generating job opportunities and improving the quality of life. These activities have a positive impact in the short and medium term, as they stimulate a virtuous circle of growth and inclusion. In addition, they are closely linked to the Group's commercial operations, as they foster the strengthening of relations with local communities and consolidate the Group's position in the territory by responding to social and economic needs, in line with its long-term strategic objectives.

This analysis highlights not only the financial and operational impacts linked to social and environmental dynamics, but also how strategic choices can positively or negatively affect local communities. In fact, the Group aims to maintain solid relations with them, aware that continuous dialogue with the territory to understand its needs is fundamental for guaranteeing lasting success. Banca di Asti, for example, intends to support financial education for local businesses, in order to accompany them in a cultural change that can facilitate the green transition and allow them to grow, minimizing risks and seizing all opportunities, including those related to the world of sustainability.

Banca di Asti has always been considered a "local Bank": it has a widespread presence and its history is closely linked to that of the areas to which it belongs. From these aspects derives a deep knowledge of the social, cultural and environmental character of the areas in which the Bank mainly operates (Piedmont, Liguria, Valle d'Aosta, Lombardy and Veneto) and a deep sensitivity and attention to local needs and requirements.

In continuity with past years, the Group has played an active role in the development and well-being of the local area in which it operates, understood as the set of people, companies and local institutions that are part of it and in which they share interests, values, cultural traditions, economic activities and social relations.

With the aim of pursuing a project of growth and sustainable value creation for all its Stakeholders, it has promoted numerous commercial initiatives through sponsorships (purchase of advertising space, on a voluntary basis and in line with the promotion of the brand, as part of initiatives in support of the territory) for the benefit of associations and local authorities.

The commitment to the community is manifested through environmental, social and cultural initiatives aimed at territories, institutions, companies and individuals.

S3 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

The Group supports events and associations that promote local development, collaborates with local bodies and entities to offer scholarships to deserving students and improve access to health and welfare services. In the environmental field, it participates in awareness-raising campaigns and carries out activities in favour of sustainability. In addition, it promotes financial and social education, with a particular focus on young people and the prevention of vulnerabilities. For more details on the initiatives carried out during 2024, please refer to section S3-4. The table below shows the impact that emerged from the Double Materiality exercise, with an indication of the type, time horizon and segments of the value chain affected.

ESRS – Sub-topic	Description of the impact	Type of impact	Impact direction	Time horizon	Value chain
S3- Affected communities <i>Economic, social and cultural rights of communities</i>	Exposures to companies that generate an impact on the well-being of local communities through skills development and entrepreneurship projects which make it possible to support the social and economic development of the communities.	Potential	Positive	Short, medium-term	Business activities

The table below illustrates the mapping of the opportunities in the affected communities with an indication of the time horizon and the segments of the value chain affected.

ESRS – Sub-topic	Description of the opportunity	Time horizon	Value chain
S3- Affected communities <i>Economic, social and cultural rights of communities</i>	Promotion and support of communities and companies of all size through subsidized forms of financing.	Medium-term	Business activities
S3- Affected communities <i>Economic, social and cultural rights of communities</i>	Strengthening of the Bank's positioning in the area through the organization of financial education and sustainability programmes.	Short, medium-term	Business activities

In light of the material assessment, it should be noted that no cases have been identified that have particular characteristics, or that operate in specific contexts, or that carry out activities that expose them to greater risks among the affected communities. Through a careful analysis, the Group has verified that the communities involved do not fall into these categories, therefore excluding the presence of distinctive risks linked to these variables.

Impacts, risks and opportunities management

S3-1 – Policies related to affected communities The Cassa di Risparmio di Asti Group, in order to also regulate, among the various areas, the management of potential impacts and opportunities on affected communities, has adopted the following policies:

- Group Sustainability Policies;
- Code of Ethics and Conduct.



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

This documentation is available to all Stakeholders on the Parent Company's institutional website.

The Group actively promotes its image by supporting numerous cultural, sports and social initiatives, thus providing its support to the community and the territories in which it operates. It actively collaborates with the Public Administration and the Supervisory Authorities, always and strictly adhering to the principles of fairness, integrity, independence, transparency and compliance with current regulations.

Aware of the strategic importance of the territory for a future of sustainable growth and development, the Group performs its role as a financial intermediary with responsibility, aiming to create long-term value for people and businesses. It supports and promotes technological, financial and organizational innovation and the internationalization of the local business network.

The Group also promotes participation in the life of the local community and support of the entrepreneurial fabric and families, including through collaborations with public institutions, trade associations and local organizations. Within its Code of Ethics, the Group specifies clear guidelines that define relations with local communities, recognizing and sharing the value of corporate social responsibility.

The Group is also committed to respecting social obligations and contributes to the economic, intellectual and social enrichment of the communities in which it operates, supporting humanitarian, cultural and sports initiatives through grants, sponsorships and donations, always in full compliance with its Code of Ethics.

The Group promotes the enhancement of people and the protection of human rights in the conduct of its activities and in all the resulting relationships. This commitment is reflected both in the dialogue with personnel and collaborators, of whom it recognizes the primary importance, and in relations with Customers and Suppliers, as well as in its compliance with the principles of legality, loyalty, fairness and transparency. Although there is no formal human rights policy for the affected communities, these rights are respected in compliance with the Group's ethics principles and values, as local communities are considered an integral part of the Group's Stakeholders.

The Group has not reported, in its own operations upstream and downstream in the value chain, any cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving affected communities.

The Cassa di Risparmio di Asti Group is actively committed to the direct engagement of the affected communities, with particular attention to the youth target on social networks, in particular on the social media *Instagram*. The communication covers a wide range of topics, from financial education to sustainability, to awareness building on important issues such as "gender-based economic violence" to prevention of online scams. It takes place on a weekly or monthly basis through the dissemination and publication of content. In addition, the Group organizes a variety of thematic informational events focusing on topics related to sustainability, business and infrastructure, in synergy with various entities, such as *Corriere della Sera*.

**S3-2 – Processes for
engaging with affected
communities about
impacts**

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

These events are held annually, as are contests and events with schools which address social and environmental issues, carried out in collaboration with schools and voluntary associations. Another important event is the reception of the plogging tour, organized in collaboration with the Lo Sport è Vita ODV Association and Polisportiva CR Asti. Sponsorships are managed annually with the direct involvement of the community. The active participation of the Stakeholders involved and the large attendance numbers make it possible to understand which issues are of particular interest to local communities, thus promoting the active listening to their needs and conveying future initiatives in order to adequately respond to these requests.

The aforementioned engagement is measured by means of various metrics, such as the number of registrations to the initiatives by schools and pupils, the number of participants in the events, the number of views and the level of engagement on social media and the news in local newspapers.

The operational responsibility for these activities is attributed to the Communication Office and to the Manager of the Direct Channels and Communication Service, who guarantees compliance with and proper monitoring of all phases of involvement.

**S3-3 – Processes to
remediate negative
impacts and channels
for affected
communities to raise
concerns**

The Group has set up a structured process to monitor and respond to the concerns of affected communities, providing dedicated channels to express any concerns and to receive assistance. In particular, Banca di Asti and Pitagora are present on public platforms that are accessible by both Customers and non-Customers, such as Trustpilot, Meta and Google My Business, whose reviews are monitored and analysed weekly.

Any negative reviews or specific requests are promptly reported to the competent Offices and the Branches concerned by email, with an invitation to intervene directly to resolve any problems and provide prompt feedback. The Branches are also required to provide feedback to the Communication Office after contacting the Stakeholder involved. This system ensures the rapid and effective management of problems raised. Although the communication channel through the reviews on Google and other platforms is autonomous and independent, it is in any case supervised by the Communication Office to ensure that responses are adequate and timely.

The Group undertakes to support the effectiveness of these channels through careful monitoring, even if not formalized within a specific Policy, thus ensuring transparency and the protection of users against any retaliation. The reviews are accessible to the entire community, without the possibility of manipulation by individual companies, offering people the opportunity to freely express their needs or concerns.



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

The Cassa di Risparmio di Asti Group has undertaken several strategic initiatives with the primary objective of producing positive impacts for the affected communities by addressing social and economic challenges.

Below is a representation of the main initiatives broken down by areas of intervention.

Cultural and territorial support initiatives

Sport is universally recognized as a vehicle for fundamental values such as loyalty, sense of responsibility, determination and teamwork. The Bank has always sponsored local sports clubs, often volunteer-based, which involve individuals of all age groups in their activities.

Banca di Asti also strongly believes in development and innovation, supporting the area in which it operates through initiatives aimed at creating value for individuals and businesses.

Large sponsorships were granted to support the important events that it was possible to organize throughout the year, including the Palio di Asti, the Festival delle Sagre di Asti, the Douja d'Or, the Magico Paese di Natale in Asti and the Fattoria in Città in Vercelli, activities that have had positive economic repercussions on the territory.

The cultural initiatives promoted by both the Asti museum circuit, such as the Escher Exhibition at Palazzo Mazzetti and the Biella museum circuit, such as the Steve McCurry Exhibition at Palazzo Gromolosa, were also of great importance.

In continuity with previous years, Banca di Asti has confirmed its presence, through sponsorship, in the assignment of the 2023/2024 scholarships in collaboration with the Fondazione Cassa di Risparmio di Asti and UniAstiss. The initiative provides for the awarding of a scholarship of EUR 500 (gross of any legal withholdings) for each student of the Secondary Schools of Asti and Province, or resident in the Province of Asti who attended a school outside the province, who obtained the maximum score in the final exam for the 2023/2024 school year.

The Group undertakes to choose suppliers linked to the territory in which it operates which, as required by the "Group Sustainability Policies", base their activities on compliance with the principles of legality, loyalty, fairness and transparency and in compliance with the law and with current regulations, favouring the production of eco-sustainable gadgets and materials. By way of example, in 2024, on the occasion of the Vinitaly event, 100% recycled cotton shopping bags and recycled paper diaries were ordered. The Group also undertakes to choose posters printed by FSC (Forest Stewardship Council) certified paper mills.

For over 15 years, Banca di Asti and Salutissima SMS ETS (Salutissima Società di Mutuo Soccorso – Ente del Terzo Settore) have been actively collaborating in the "Welfare" sector, implementing various initiatives in favour of the local communities in which they operate.

Starting as early as 2017, FAB SMS, now Salutissima, wanted to translate the concept of mutuality in a modern way to get closer to the territory and offer services related to health and well-being.

S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

In this regard, Salutissima and the Primo Dental Centres opened a new multi-specialist facility of over 750 square meters in via Carso 15/B in Biella in 2023. The new office provides citizens with dental care and numerous specialist examinations. During 2024 it was the turn of the "New Health Service Centre", inaugurated in Corso G. Ferraris in Asti, with the aim of becoming a local point of reference for the assistance and treatment of health problems of people of all ages. This project was made possible thanks to the partnership with Hastafisio, which in recent years was looking for a plan for further development and growth. The Centre, designed according to the principles of industry 4.0, i.e. innovation, technology, digitalization, research and development, stands out for its accessibility and inclusiveness, both from an architectural and operational point of view, thanks to smart systems for making appointments and intake of patients, and consists of four operating units:

- 1st level Functional Recovery and Re-education centre equipped with every technology and served by the work of qualified Professionals who base their choices and therapeutic strategies on the Evidence of Scientific Research and on the needs of each individual;
- Sports Medicine centre;
- multi-specialist medical assistance clinic;
- Radiodiagnostic service centre for first level examinations (radiology, mammography, ultrasound) and second level examinations (magnetic resonance) provided by JB Medica with latest generation technologies.

Salutissima also aims to promote educational, cultural and research activities aimed at spreading the values of mutualism and to support social initiatives for the benefit of the entire community. These projects are related to the seven pillars on which the services that Salutissima provides to its Patients are based: medical care, assistance, prevention, dental care, telemedicine, nutrition, exercise. It spreads the values of the Culture of Well-being thanks to the provision of free prevention services with the "Camper della Salute", which in 2024 saw its participation in the "Banca di Asti Private - Golf Tour 2024", a 7-stage sporting event dedicated to the Bank's Private customers, in collaboration with Golfindustria ASD. During the event, dedicated to well-being and exercise, participants were offered free health prevention services.

Environmental initiatives

As a demonstration of an increasing awareness of environmental issues and in continuity with past years, in 2024 the Group also chose to join the "M'illumino di meno" initiative, an important awareness raising and communication campaign dedicated to energy savings and a sustainable lifestyle on an international scale. All the signs at the Branches present in the territories were switched off from 16 to 19 February. In September, Banca di Asti also took part in the European Mobility Week, the week dedicated to sustainable mobility. The promotional campaigns for both initiatives, aimed at encouraging more sustainable behaviour, were also disseminated on Banca di Asti's social channels.

The Group has organized various initiatives to educate and inform the community about sustainability and to spread greater awareness of the risks deriving from incorrect practices that may have an impact on the environment. In particular, it has



promoted dissemination events such as "The City and the River - Businesses, Innovation and Infrastructure" in collaboration with Corriere della Sera. It also participated in the plogging tour (jogging while picking up trash) in the city of Asti, supporting the initiative of the "National Plogging Champions" and the "Giro d'Italia Plogging". To complete its environmental activities, the Bank has installed a panel with air purifying graphics in Asti, with the aim of making the local population aware of the importance of air quality and the effects of pollution.

Social initiatives

The Group intends to promote and favour people's independence and security, with particular attention to young people between 18 and 34 years of age.

To counteract poor financial and digital education, it therefore launched awareness raising campaigns on its social platforms, focusing in particular on the social media Instagram, where it promoted the provision of information and content related to a wide range of topics, such as financial education, sustainability, prevention of digital fraud and important social issues such as "economic gender violence". In this regard, since the statistics on gender-based violence are particularly worrying, the Group has decided to promote awareness raising actions both on social media and directly in schools, with the aim of fostering greater awareness and spreading a more inclusive and respectful culture. The Bank has therefore organized contests on this issue addressed to the First and Second Degree Secondary Schools of Asti and the Province, in collaboration with the Mani Colorate Volunteer Association, and planned events and projects on the same topics in synergy with the Schools, which took place at the Banca di Asti Auditorium.

Pitagora has demonstrated its social commitment by supporting the volunteer association "Casa UGI", a project created to host, in its apartments, families who reside outside Turin of children and young people in therapy at the Paediatric Oncology Centre of the Regina Margherita Children's Hospital. Thanks to its donation, Pitagora was able to support a family by covering their ordinary expenses. The mission of the Turin-based association is to promote and support initiatives aimed at improving medical and social care for children and adolescents with cancer, as well as supporting their families and encouraging scientific research and treatment in this area.

In 2024, Pitagora renewed its support for the volunteer organization "Amici di Jangany", which is dedicated to the development of the village of Jangany in Madagascar, and the education of its inhabitants. This gesture underlines the company's commitment to promoting inclusion and social growth projects, both locally and internationally.

The Group has achieved significant results both in the events it has organized and in the management of its social channels. The events promoted were widely attended, demonstrating the strong interest and engagement of the community. At the same time, social media activities achieved excellent performance, with favourable results both in terms of views and a high level of engagement, highlighting a growing interaction with the digital audience.

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

Banca di Asti has always been a "local Bank", thanks to its widespread presence and deep roots in the history of the areas to which it belongs. This close bond has allowed it to acquire an in-depth knowledge of the local social, cultural and environmental context, showing particular attention to the needs and requirements of the community with which it interacts.

The Bank is actively committed to the enhancement of the economic and social context in which it operates, pursuing a project for sustainable growth aimed at generating value for all Stakeholders and supporting the promotion of numerous initiatives, thus strengthening the Group's positioning in the territory.

To this end, the Group has adopted a targeted strategy that envisages the execution of concrete actions to seize the opportunities deemed relevant, with particular attention to strengthening its positioning and Customers' access to subsidized forms of loans. With this in mind, it has organized various financial education and sustainability informational events in the territories in which it operates, available not only to its Customers but also to the entire community. It also strengthened its collaboration with public and private institutions to develop joint initiatives to support the local economy, including sustainable finance projects and credit solutions dedicated to businesses and individuals. Lastly, the Bank has embarked on a path to adhere to subsidized loan programmes promoted at national and European level, with the aim of facilitating access to credit for the economic realities of the territory, thus contributing to sustainable and inclusive development. For more details on the actions promoted, please refer to section S3 SBM-3.

At the same time, to meet the needs of its Customers and enhance the bond with the territory, the Group has developed a wide range of dedicated products and services, aimed at the affected communities. For further details on the products and services offered, please refer to the section ESRS 2 SBM-1.

For the reporting year 2024, no serious human rights issues and incidents were reported in relation to the affected communities.

The Cassa di Risparmio di Asti Group informs the community through various channels, including the press, its website and social networks. In the case of events or situations of particular importance, it ensures timely communication to keep the community constantly updated.



Metrics and targets

Based on the needs of the affected communities, in line with its strategic policies and in synergy with the local institutions, the Group defines specific targets aimed at supporting the territory in which it operates and supporting local economic growth, protecting the environment and encouraging social inclusion.

The Stakeholder engagement process consists of a continuous dialogue with individuals or groups who have an interest in the Group's activities or who could be positively or negatively influenced by them. The objective is to actively engage the main stakeholders, collecting their expectations and concerns to integrate them into company strategies, building and maintaining transparent and collaborative relationships and ensuring the sharing of clear information about the company's activities, choices and impacts.

The Group involved a sample of Stakeholders, such as Shareholders, Customers, Employees and Suppliers belonging to the local community, diversified in terms of role, gender and age, through an exploratory online survey functional to the preparation of the Double Materiality analysis.

The results of the survey conducted, which asked participants to analyse the significance of various impacts on company operations and on the business concerning people and the environment, were also taken into consideration in the definition of the strategic objectives of the 2025-2027 Sustainability Plan, so that the initiatives identified are consistent both with the preferences expressed by the Stakeholders and with the strategic directives of the company.

The constant monitoring of the pre-established objectives is a fundamental activity to ensure their full achievement within the established times and to make any remedial actions. For more details on the Sustainability Plan, please refer to section ESRS 2 GOV-1.

The target defined in relation to the affected communities, according to the provisions of the 2025-2027 Sustainability Plan, is shown below. This target reflects the principles and values expressed in the Group Sustainability Policies and in the Code of Ethics, according to which "the Group actively promotes its image by supporting numerous cultural, sports and social initiatives, thus providing its support to the communities and the territories in which it operates".

S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities



SOCIAL
INFORMATION

SUSTAINABILITY
STATEMENT

ESRS – Sub-topic	Target	Final target	Base year and Base value	Achievement year	Actions	Perimeter
S3- Affected communities <i>Economic, social and cultural rights of communities</i>	Support to the entrepreneurial fabric and the local community	Preparation of agreements to support companies that intend to benefit from funds or guarantees intended for the transition and/or the achievement of sustainability targets (e.g. SACE Green and Futuro, EIF) and their related maintenance	<u>Base year:</u> 31/12/2024 <u>Base value:</u> Banca di Asti signed an agreement with the EIB for financing the Bioeconomy and a framework agreement with Finpiemonte to support investments in the territory	<ul style="list-style-type: none"> ▪ 2025 ▪ 2026 ▪ 2027 	Contact, assessment and contractualization of agreements with the relevant bodies that provide funds and guarantees for the benefit of Customer companies	Banca di Asti

To consult the 2022-2024 Sustainability Plan, with reference to the objectives and targets set for 2024, please refer to section ESRS 2.



S4 – CONSUMERS AND END-USERS

Strategy

Following the Double Materiality analysis, the Group identified potential material impacts, both positive and negative, regarding the information intended for consumers and end-users, as well as the social inclusion of the latter. Protecting the privacy of its Customers, data security and accessibility to banking services are key elements for consolidating Customer trust and respect. Therefore, these factors are among the top strategic priorities of the Group, which invests in advanced data security technologies and adopts strict internal policies for the management of sensitive data in compliance with current regulations, such as the GDPR.

In addition, the Group is committed to offering banking solutions that are transparent and easily understandable for all Customer segments, including those in vulnerable conditions. In fact, accessibility to banking products and services is a fundamental element for promoting social inclusion. The Group develops and supports initiatives such as financial education programmes to ensure total clarity and comprehensibility of the products and services offered and of all communications transmitted to its Customers.

Every communication, operation and transaction – understood in the broadest sense of the term – carried out or implemented is inspired by the utmost operational correctness, the completeness and transparency of the information, legitimacy from a substantial and formal aspect and clarity and truth in the accounting and documentary evidence. The Group adopts responsible marketing practices, ensuring that its offerings are easily accessible and understandable even for Customers with less financial knowledge.

The regulations on the transparency of pre-contractual and contractual conditions that protect all Customers and in particular relations with consumers or retail Customers, are characterized by the following elements:

- simplification of the documentation made available to Customers ("Pre-contractual information" and "Contractual information"): the disclosure documents must be drafted in a simple and clear way, using a language suitable for the level of financial culture of the different groups of customers, also in relation to the proposed product;
- correctness, completeness and comprehensibility of the information to be provided: the information contained in the disclosure documents must be concise, essential and exhaustive, to allow the Customer to understand the characteristics, risks and costs of the product and provide them with a clear illustration of their rights, as well as the information contained in the contracts, with proof of receipt by delivering a copy of the same to the Customers, together with the general conditions;
- comparability of offers: the structure of the disclosure documents must include, in addition to the indication of the summary cost indicators, the articulation of information on products and services in a logical and priority order, in order to facilitate their understanding and comparison with similar products/services to make comparability immediate and effective;

S4 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model



SOCIAL
INFORMATION

SUSTAINABILITY
STATEMENT

- preparation on due date of the contract, and in any case at least once a year, of a periodic report containing complete and clear information on the progress of the relationship, accompanied by the updated version of the Summary Document containing the economic conditions applied, in addition to the document called "Statement of Fees" (SOF), drawn up in accordance with the provisions of Article 11 of Regulation (EU) 2018/33 of 28/9/2017 for Consumers who are current account holder.

With this inclusive and responsible approach, the Group directs its strategy towards a constant strengthening of Customer confidence, aiming to improve the reliability and security of the services it offers, and to promote accessibility through banking solutions suitable for all categories of consumers.

The reputational risk for the Cassa di Risparmio di Asti Group is closely linked to its ability to correctly manage sensitive information, guarantee the inclusiveness of its products and services and adopt responsible marketing practices. Ineffective management of Customer data security or unauthorized disclosure of confidential information can seriously compromise consumers' confidence, damaging the perception of the institution as a secure custodian of financial information. Similarly, if the Group does not adopt inclusive policies and does not clearly communicate the characteristics of its products, it risks being perceived as a distant or exclusive entity, reducing its attractiveness for a diversified and vulnerable Customer base. The lack of financial education or adequate information provided on the products and services offered can further undermine its image, fuelling a negative perception of the institution, with consequent economic and legal damage. In a highly competitive sector such as banking, where trust is the foundation of the relationship with Customers, reputation is of fundamental importance. Reputational damage not only undermines the loyalty of existing Customers, but also complicates the acquisition of new Customers, jeopardizing the sustainability and long-term success of the Group. Consequently, it is essential to carefully manage elements such as privacy, accessibility and social responsibility to protect the brand and guarantee the continuity of the banking business model.

The table below shows the impacts that emerged from the Double Materiality exercise, with an indication of the type, time horizon and segments of the value chain affected.

ESRS – Sub-topic	Description of the impact	Type of impact	Impact direction	Time horizon	Value chain
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end-users</i>	Impact of the dissemination of sensitive/confidential information due to inefficient management of the security systems and privacy of Customers.	Potential	Negative	Short, medium-term	Company operations
S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Exposures to companies that generate an impact on the accessibility of products and services, also through transparent communication of their characteristics.	Potential	Positive	Short, medium-term	Business activities



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Impact related to accessibility to products and services, also through transparent communication of their characteristics (e.g. responsible marketing) and financial education initiatives.	Potential	Positive	Short, medium-term	Company operations
--	---	-----------	----------	--------------------	--------------------

The table below illustrates the mapping of risks regarding consumers and end-users, with an indication of the time horizon and the segments of the value chain affected, in correlation with the most directly affected business processes identified within the Group's taxonomy, and with the related main controls put in place.

ESRS – Sub-topic	Risk rationale	Time horizon	Value chain	Main business processes impacted	Main controls identified
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end-users</i>	Operational and reputational risk Risk of any increase in costs due to penalties for failure to disclose information on products and services offered by the Bank. Increased attention by consumers to the sustainability characteristics of the financial products and services purchased.	Short, medium-term	Own Operations, Business activities	<ul style="list-style-type: none"> ▪ Credit ▪ Preparation and management of Transparency documentation ▪ Communication management ▪ Commercial Planning and Development ▪ Product portfolio management 	<ul style="list-style-type: none"> ▪ Guidelines on environmental issues in the Group Policies on Credit ▪ Adoption of Group Sustainability Policies ▪ Use of the Climate Change Risk component for the assessment and monitoring of the Customer portfolio ▪ Periodic Customer Satisfaction campaigns and analysis of complaints received from Customers ▪ Participation in or promotion of initiatives/events with information and training content for the public
S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Reputational risk Risks related to a lack of offerings consistent with the wishes and needs of consumers and poor accessibility to the services offered. Increased demand and public attention for the inclusion of the most vulnerable or marginalized consumers, with a consequent increase in pressure to respond by developing and providing products and services.	Short, medium-term	Own Operations, Business activities		

All consumers and end-users may suffer material impacts included in the scope of application of the disclosure pursuant to ESRS 2.

The Group's Customers are mainly divided into retail and corporate. Retail Customers include individuals clustered in the following categories:

- minors: very young people aged between zero and 17 who are in the training phase and do not yet have financial independence;
- young adults: young people aged between 18 and 30 who are starting to enter the world of work or are already employed. Their needs range from the

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

management of initial income to credit products such as loans to finance study courses or the purchase of a car;

- employees: people of working age, with greater financial stability and a wider range of financial needs/requirements, such as the subscription of mortgages, investments and savings products for the future;
- retirees: individuals who are already retired and have the need for financial stability and security. Their priorities include the management of current expenses, assistance in succession planning and social security products;
- financially disadvantaged customers: individuals, families or groups who are in financial difficulty or who have limited access to financial resources. These subjects may find themselves in a condition of economic vulnerability for various reasons, including low income, unemployment, large or single-parent families, and elderly people with low pensions.

Corporate Customers, on the other hand, are made up of joint-stock companies, partnerships, sole proprietorships and freelancers, distributed over different geographical areas, with a greater presence in the territories of Piedmont and Lombardy.

Following the analysis of the potential material negative impacts for end-users emerging from the Double Materiality analysis, it is noted that the Group could be faced with generalized or systemic effects. An example of this could be the disclosure of sensitive information due to inadequate management of the security and privacy of Customer data, which could have repercussions not only on individuals, but also on large categories of users or on the entire banking system. In particular, this could occur in situations where the Group is responsible for managing a high volume of sensitive information, as is the case with financial transactions, personal data and historical credit information. Inadequate data security management could put the confidentiality of thousands of Customers at risk, generating systemic effects on the financial sector. The consequences of such a violation could profoundly undermine the trust of Customers, with repercussions on the integrity and operational stability of the Group, as well as entailing legal sanctions, reputational damage and significant economic losses.

The Group implements measures to facilitate access to its services, such as clear and transparent communication on the products offered and financial education initiatives. The positive impacts might affect different categories of consumers and manifest themselves in the geographical areas in which the Group operates. For further details on how the Group has managed positive impacts, please refer to ESRS sections S4-2, S4-3 and S4-4.

Impacts, risks and opportunities management

S4-1 – Policies related to consumers and end-users In order to regulate the management of potential impacts and risks on Customers, such as consumers and end-users, the Cassa di Risparmio di Asti Group has adopted various policies related to the following areas:



- Social inclusion of consumers and/or end-users;
- Impacts related to information for consumers and/or end-users.

Social inclusion of consumers and/or end-users

The Policies related to the social inclusion of consumers and/or end-users are shown below, namely:

- Group policies on product distribution;
- Regulation on the approval of new products and services and entry into new markets;
- Group policies on transparency.

The **Group Policies on product distribution** aim to regulate the way in which the Cassa di Risparmio di Asti Group complies with current regulations, defining the Service Model for the distribution of products, operating guidelines, governance and controls implemented. The Policies are based on principles of proportionality, taking into account the complexity and riskiness of the products, the marketing techniques used and the types of Customers to whom they are offered. In addition, the evidence of the actions taken in relation to the governance and control mechanisms on the products must be documented and stored for verification purposes, as well as made available to the competent authorities upon request. This document is accompanied by the **Regulation on the approval of new products and services and entry into new markets**, which aims to regulate the process of approval of new products/services and entry into new markets (Product Approval process) with reference to the offering of products and services by the Cassa di Risparmio di Asti Group, identifying the operating phases, roles and responsibilities of the Corporate functions involved in various capacities. In detail, it is aimed at all the Group's corporate structures that, as part of their skills, promote innovative proposals aimed at entering new markets or operating segments, offering new products and activating new services, as well as the competent structures for the assessment of the feasibility and related impacts of these proposals.

This Document has the following objectives at the Group level:

- introducing a defined and transparent process capable of guaranteeing the involvement of all the company stakeholders concerned, each according to their skills and responsibilities, and the correct mechanisms for coordination and interaction between them on the occasion of the introduction of a new product/service, or entry into new markets or new operating segments;
- guaranteeing the assessment of all the preliminary aspects relating to the individual initiative in line with the principle of sound and prudent management, according to principles of proportionality based on the type of product or service, the nature of the investment service offered and the reference market identified;
- raising awareness among the company structures on the need to carry out a careful preliminary assessment of pricing, risks, costs, any conflicts of interest and impacts on the Internal Control System and on the accounting system deriving from new operations, also in order to allow a complete



assessment by the competent Corporate Bodies. The procedures and processes are governed by the Regulatory and Operational Provisions on the definition and monitoring of the target market of the banking products.

The **Group Policies on transparency** aim to regulate the transparency regulations contained in Title VI of the Consolidated Banking Act, as well as the implementing regulations issued by the Ministry of the Economy and Finance, the CICR and the Bank of Italy aimed at protecting all Customers, and in particular relations with Consumers or Retail Customers.

These rules apply to all banking and financial transactions and services offered by the Group, also outside the branches ("off-premises") or through "remote communication techniques" (e.g. Internet), and that have the purpose of providing Customers with correct, clear and exhaustive information, which facilitates the understanding of the characteristics, risks and costs of the products offered and allows them to be easily compared with other offers in the pre-contractual phase, as well as protecting the phase of subscription of contracts and the post-contractual phase of periodic reporting.

Without prejudice to compliance with the disclosure obligations envisaged by the legislation in force from time to time and the related internal procedures governing transparency obligations, each Employee is required to make available to Customers the updated illustrative documentation relating to the products and services offered, and the Information Guides where applicable. The personnel responsible for specific activities illustrate to the Customer the nature, risks and costs of the products, transactions and services offered or specifically requested.

Suitable training tools are made available to the Bank's personnel to ensure adequate and up-to-date knowledge of the Regulations and Internal Policies on Transparency, in order to provide Customers with all necessary information and clarifications.

Besides at the branch (at the counter, on the displays and on the information totems), the main documents illustrating the services and products offered are available on the website, in the "Transparency" section, in addition to the Information Guides, drawn up according to the requirements of transparency, clarity and comprehensibility.

The Group periodically verifies and guarantees the completeness, clarity and accessibility of the information contained in the Transparency information documents intended for Customers and examines, on an annual basis, the periodic summary documents containing the updated framework of the economic conditions applied to Customers.

The Policies also indicate, in compliance with the Regulation on the Internal Control System, the model adopted for the verification and control activities on the work processes carried out by the various Group structures in the Transparency area.

Impacts related to information for consumers and/or end-users

The Policies linked to information and data related to consumers and/or end-users are shown below, namely:

- Group policies on the processing of personal data;



- Group policies on information security;
- Group policies on ICT and security risk management;
- Group policies on complaints and appeals by Customers.

The protection of privacy and customers' information are elements of fundamental importance for the Group, which undertakes to ensure that the collection and processing of personal data take place in compliance with the provisions of the law and the regulations in force on the matter. To this end, not only have the **"Group policies on the processing of personal data"** been adopted pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter also "GDPR"), but the individual Group companies have enriched the company's internal regulations with additional documentation on the matter.

The Policies adopted provide the regulatory and operating framework necessary to ensure compliance with the GDPR and national and European regulations on data protection in the Group Companies, emphasizing the importance of the principle of accountability. The Policies apply to Employees, Collaborators and third parties who interact with the Group. The entire system is based on the fundamental principles of data that must therefore be processed lawfully, correctly, transparently, limited to the purposes, minimized, accurate, secure and stored for only the time strictly necessary. The roles present within the organization have been defined, such as the Data Controller, the Data Processor, the Privacy Delegate and the Data Protection Officer (DPO). A large section is dedicated to information and consents, specifying the methods of communication to data subjects, including Customers, Employees, Collaborators and users of websites or rooms under video surveillance. The Policies also provide for technical and organizational measures to protect personal data from risks such as unauthorized access and data breaches and the impact assessment structure (DPIA) necessary for high-risk processing is defined. The policies must be implemented by the Group Companies and updated in the event of regulatory or organizational changes. The review is managed by the Privacy Delegate in coordination with the Boards of Directors.

With regard to Banca di Asti and Pitagora, the following Regulatory and Operational Provisions were also issued on the processing of personal data:

- Regulatory and Operational Provisions on Registers of Personal Data Processing Activities;
- Regulatory and Operational Provisions on the Data Protection Officer (DPO);
- Regulatory and Operational Provisions on Incident Management in Personal Data Processing Activities (Data Breach);
- Regulatory and Operational Provisions on the Exercise of Rights by the Data Subject;
- Regulatory and Operational Provisions on Data Protection Impact Assessment (DPIA);
- Regulatory and Operational Provisions on Data Retention.

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

The Group attaches strategic importance to the management of the security of information and company assets in order to guarantee the confidentiality, integrity, authenticity and availability of data and information, as well as ensuring, in compliance with the principle of accountability, appropriate and consistent management of ICT risks throughout the entire life cycle of company data. In line with current legislation, cybersecurity is governed by guidelines and operating processes aimed at protecting the interests and rights of Customers and Collaborators with rules integrated into the Group's Internal Control System, which defines the responsibilities at all company levels, in line with the reference regulations.

The Group's IT Security guidelines are defined as part of the "**Group Policies on Information Security**". The document describes the scope and general contents of the ICT security measures. The detailed operating elements and processes are described in the related "Regulatory and Operational Provisions on Information Security" and in the further related Regulatory and Operating Provisions.

The Group identifies the following key roles in the area of Information Security management:

- Role of responsibility/coordination of Information Security: assigned by decision of the Board of Directors of the Parent Company to the Head of the ICT Office of Banca di Asti with the aim of coordinating the Group's initiatives;
- Operational Role: assigned to the IT Security Function;
- Data Owner: in integration with what has already been defined in the "Group Policies on Data Governance", the Data Owner is responsible for the classification of data, the periodic review of the classification of the same and collaborates with the IT Security Function for the definition of profile authorizations and data access levels;
- Asset Owner: coincides with the Process Owner, according to the taxonomy of business processes;
- Control Role: assigned to the following functions:
 - Risk Management Function: monitors the risks associated with ICT and security as part of the broader management of operational risks;
 - Compliance Function: verifies compliance with internal regulations and external regulations on ICT and security;
 - Internal Audit Function: verifies the effectiveness and efficiency of the controls, policies and procedures adopted.

The hierarchical lines of reporting regarding the enforcement of security measures and management of the related risks are governed by the "**ICT Regulation for the Cassa di Risparmio di Asti Group**" and the "**Group Policies on ICT and Security Risk Management**". In fact, the latter establish the model of responsibilities and processes for the governance and management of ICT and security risk, in compliance with Supervisory regulations and internal regulations, with the aim of defining the Group's IT Risk Management methodology and process



SUSTAINABILITY
STATEMENT

SOCIAL
INFORMATION

and to establish the principles underlying the IT risk management model divided into several interrelated phases.

The information security policy is developed in compliance with the requirements set forth in "Bank of Italy Circular no. 285 of 17 December 2013" (and subsequent updates), the "EBA Guidelines on Information and Communication Technology (ICT) and security risk management" and, in particular, by the Commission Delegated Regulation (EU) 2024/1774 of 13 March 2024, which supplements Regulation (EU) 2022/2554 of the European Parliament and of the Council with regard to the regulatory technical standards that specify the instruments, methods, processes and policies for the management of IT risks and the simplified framework for the management of IT risks using international standards and best practices in the field of information security.

The Group Policies on Information Security are shared with all third parties that offer ICT services, for an alignment of security standards.

The IT Security Function actively participates in the activities of CERTFin, incorporating and introducing the inputs collected within the company operations. Any events or situations detected at system level are communicated to the entire company population through the company Intranet. External threat intelligence, early warning services and the Security Operation Centre are also in place in order to intercept, convey and manage any anomalous or potentially anomalous events for the Bank and for the Group.

The Cassa di Risparmio di Asti Group considers fairness in relations with Customers as an integral part of sound and prudent company management.

The Group's culture is oriented towards satisfying the needs of Customers during all phases of the contractual relationship, with particular attention to cases in which dissatisfaction and potential conflicts may arise; in this perspective, the management of complaints represents an opportunity to restore a satisfactory relationship with the Customer and to preserve and consolidate existing relationships.

Since 2016, the Group (with subsequent updates carried out in 2019, 2020, 2022 and, most recently, on 17 July 2023) has adopted specific **Group Policies on complaints and appeals by Customers**, characterized by constant attention to the relationship with the Customers and the need to preserve commercial relationships in the event that elements of dissatisfaction arise. The objective of the aforementioned Policies is to guide the management of Complaints submitted by the Customers of the Group Companies relating to banking and financial products and services, financial instruments and insurance products offered, defining the guidelines to ensure effective protection of the interests of the Customers as well as of the Group Companies, increase corporate awareness on the issue, involve the various company structures in the management of complaints in compliance with the various reference regulations, as well as prevent the emergence of disputes.

The Policies also guide the management of appeals to the Banking and Financial Ombudsman, the Arbitrator for Financial Disputes and complaints submitted to IVASS, as well as the obligations related to the various out-of-court solutions of disputes that can be activated by Customers in the field of banking and financial

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

services, as well as of investment and insurance brokerage services, according to the indications of the specific regulatory provisions in force from time to time.

With regard to the methods with which any particular critical issue are communicated to the highest governance body, the Policies provide that, with at least semi-annual frequency, the Complaints Management Function of each Group Company prepares for the Chief Executive Officer/General Manager and for the Compliance Function a specific report on the management of complaints including, in addition to quantitative information, useful elements to identify the underlying phenomena, any related critical issue and the related remedial actions.

The Compliance Function prepares at least once a year, on the basis of the reports provided by the respective Complaints Management Functions, a specific report for the Corporate Bodies (Chief Executive Officer/General Manager and Board of Statutory Auditors) in which the data relating to the overall situation of the complaints is shown, in addition to any other element useful for assessing the underlying phenomena, any related critical issue and the related remedial actions, as well as the adequacy of the procedures and organizational resources adopted. The Compliance Function also provides the SCI Interfunctional Committee on a quarterly basis with the evidence deriving from the management of the complaints and appeals received by the Group Companies during each quarter. Lastly, the Complaints Management Function informs the other Corporate functions, and in particular the Sales Function, to help identify the best solutions and possibly review the structure of the offering and/or the marketing methods used in order to overcome the critical issue related to company operations.

The changes made in 2023 to the aforementioned Policies reserve to the Internal Audit Function the task of reporting, on the basis of the three-year planning of the third-level function, on the adequacy and functioning of the overall system of internal controls on management of the complaints and appeals received.

All the policies described above include all consumers and end-users connected to the Group's commercial activities.

With regard to human rights policy, relating to consumers and end-users, the Group, in relation to the operating context in which it operates, is committed to implementing principles and policies that promote an inclusive approach. Thanks to specific controls which are an integral part of the governance structure and internal regulations, the Group undertakes to respect the cultural, social, ideological, gender and age diversity of all Stakeholders, including consumers and end-users. In addition, the policies aimed at Customers are oriented towards the protection of human rights, with particular attention to the protection of personal data and data security, considered fundamental rights of the individual according to the Charter of Fundamental Rights of the European Union, as well as the protection of consumer rights, guaranteeing correctness, transparency and fairness in contractual relationships.

To guarantee the protection of human rights, the Group is inspired by the United Nations International Charter of Human Rights and the International Labour



Organization Declaration on Fundamental Principles and Rights at Work, as detailed in the Group Sustainability Policies. In addition, the Group Policies on the processing of personal data comply with the provisions of the GDPR, which is based on the Charter of Fundamental Rights of the European Union. The Group also offers a channel for the submission of complaints and has set up an internal system for reporting violations (known as Whistleblowing), through which it is possible to report facts that may constitute a violation, including human rights, as fully detailed in section G1-1.

For information on engaging with consumers and/or end-users, please refer to sections ESRS 2 SBM-2 and S4 SBM-2.

For information on measures to remediate and/or make it possible to remediate impacts on human rights, please refer to section S4-2.

The Cassa di Risparmio di Asti Group recognizes the importance of the opinions of consumers and end-users as a key element in guiding its decisions and activities, aimed at managing material impacts on them. This approach takes the form of various initiatives aimed at collecting and enhancing Customer feedback, promoting constant dialogue and continuous evolution of the services offered.

The Group has always paid particular attention to dialogue with Customers both to develop relationships of trust and to maintain high levels of credibility from a reputational point of view, and periodically monitors the appreciation and satisfaction with the products and/or services provided through various methods of engagement, such as the collection of reviews on the Branches on platforms such as Google, the organization of informational events and the administration of targeted surveys. These activities make it possible to assess Customer satisfaction and collect opinions on material issues. For each Stakeholder engagement process, a function responsible for engagement is identified, thus ensuring efficient management and implementation of activities. The Office responsible for collecting feedback, analysing data and defining new strategies has the task of guaranteeing systematic involvement of stakeholders and sharing the results obtained to guide the company's strategic direction with them. This process also aims to identify areas for improvement and to ensure that products and services increasingly meet the needs of Customers.

The **reviews** relating to the "point of sale" Branches received on the main online platforms, such as Google, are monitored on a weekly basis. "Negative" reviews and specific requests are reported directly to the Branches concerned via an e-mail from the Communication Office, inviting them to intervene and contact the Customer to resolve the potential critical issue. After the Branches have made contact, feedback on the follow-up carried out is requested. This process of managing and monitoring online reviews makes it possible to intervene promptly in the event of negative feedback, ensuring a timely response to resolve any critical issue.

Banca di Asti, thanks to a continuous dialogue with the local community, intends to support **financial education** for local businesses. The goal is to accompany and support them in a cultural change that favours the green transition, allowing them to

S4-2 – Processes for engaging with consumers and end-users about impacts

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

grow and seize all the opportunities related to the world of sustainability. In this regard, conferences and events were organized to stimulate direct dialogue with local businesses, in particular:

- on 8 May the conference "Sostenibilità: Rapporto Banca-Impresa" was held at the Mille Miglia museum in Brescia, where, in addition to presenting the regulatory evolution on sustainability with the next European and national steps and its impact on Italian companies, the elements that will characterize the sustainable company, the sustainability assessment, the reporting process and the comparison with competitors were examined;
- on 25 November 2024, Banca di Asti organized the event "Imprese e sostenibilità: quando una necessità si trasforma in opportunità" at the auditorium of the New Training Centre at the Asti headquarters. It was an in-depth event, attended by local companies, colleagues from the Bank and notable speakers, such as the Minister of the Environment and Energy Security, Gilberto Pichetto Fratin. During the event, the role of companies and institutions in the transition to a sustainable model was analysed, addressing key issues such as social responsibility, sustainable governance and energy efficiency. The event was also attended by some entrepreneurs from our area who talked about how they are facing the change required by the new CSRD legislation;
- in October, November and December, Banca di Asti, in collaboration with its partner CDR, organized 5 workshops aimed at companies throughout Northern Italy, with the aim of providing information about the opportunities envisaged by the Transition Plan 5.0, which provides for a tax credit in favour of companies that, as part of innovation projects in the two-year period 2024/2025, make new investments in production facilities that will result in a reduction in energy consumption.

Another significant moment of sharing and active participation is the **Christmas Concert**, a musical event held between 22 November and 10 December in the theatres of Piedmont and Lombardy. This event represents one of the main meetings between the Shareholders and the Bank, offering the opportunity to reflect on the past year through the presentation of the main financial statement indicators, to exchange holiday greetings and to enjoy a quality performance, which was attended by around 15 thousand Shareholders.

According to the "Regulatory and Operational Provisions on the definition and monitoring of the target market of banking products and services", the direct involvement of consumers/end-users also takes place through the administration of a **questionnaire**, not only to Retail Customers, but also to Business Customers and non-profit organizations. The Questionnaire includes a series of questions to ask the Customer in order to identify and recommend the most suitable current account product for their specific needs. Monitoring of the Target Market (in relation to current account products) is also envisaged annually, which also takes into account the number of complaints received. No complaints were received in 2024.

Following the monitoring activity, the Function in charge:



- identifies any need for intervention on the product catalogue or on the reference Target Market (in relation to current account products for companies);
- prepares a Report summarizing the periodic monitoring activities carried out;
- sends a copy of the Report to the Compliance, Risk Control and Transparency Functions.

Survey aimed at Customers

The Cassa di Risparmio di Asti Group has developed a well-defined and structured approach to involve its Customers and Stakeholders. The initiatives undertaken focus mainly on collecting feedback, monitoring Customer satisfaction and improving service quality. Particular attention is paid to continuous communication and the implementation of tools that facilitate direct dialogue with Customers.

Engagement activities are mainly carried out through the administration of surveys, sent to specific targets via e-mail, pop-up notifications and other digital channels as needed. These surveys aim to collect opinions on issues such as sustainability, Customer satisfaction and the quality of their relations with Group Companies. The results of the surveys are regularly analysed and used to improve services and guide future strategic choices.

In this regard, starting from July 2023, a survey was carried out in collaboration with Astra Ricerche, consisting of five questions, aimed at Customers to monitor their "**Happiness Index**". The short questionnaire, submitted so far to over 50,600 Customers with a completion rate exceeding 65%, aims to intercept the emotional state of the Customer following specific events, such as an appointment at the branch and the opening of a Current Account. The results of the survey, systematically monitored, offer an extremely flattering picture of the perception by Customers in the assessment of the Customer-Bank relationship. Customer satisfaction surveys are also conducted, broken down by reference target, such as young people aged between 18 and 30 who participated in the "SBAM" initiative.

A significant sample of **Business Customers** was also involved, between 2023 and 2024, in an **online survey**, conducted in collaboration with Astra Ricerche. The objective of the survey was to assess the level of satisfaction, identify strengths and areas for improvement, as well as understand the needs and expectations of Customers, in order to constantly improve the offering of dedicated products and services. In addition, the survey highlighted the relevance of ESG issues and financing associated with them, as well as knowledge of insurance products and services, subsidized finance solutions and support for import/export.

Over 75% of the Customers interviewed would recommend Banca di Asti to their families, acquaintances and friends. In general, Banca di Asti is perceived as an authoritative and prestigious bank; Customers appreciate the friendliness and cordiality of the staff and the reliability of the consultants.

Among the competitive advantages with which the Bank differentiates itself most from its competitors, its attention to Customer relations, the competence of its staff,

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

their honesty and the pleasantness of the branches strongly emerge, confirming the strong local connections that characterize the Group.

On the other hand, room for improvement was highlighted with the request to optimize the Internet Corporate Banking platform, in order to offer greater ease of use. In this regard, the Bank has undertaken a process to upgrade the platform which is currently underway.

The survey revealed that companies consider ESG criteria important in the evaluation of investments and hope that banks will increasingly offer services compatible with sustainability issues, including the Transition Plan 5.0. These results consolidated the Bank's decision to introduce the Sustainability Linked Loan mortgage, issued in October 2024. This product was designed to support companies in investments related to the Transition Plan 5.0 and at the same time made it possible to expand the range of loans offered by the Bank.

The opportunity to strengthen external communication regarding the Transition Plan 5.0 and issues related to subsidized finance was also noted. To this end, events, conferences and workshops were organized in the various areas of the territory where the Bank is active.

Other areas for improvement that were identified include the activation of Instant Bank Transfer, for which the Bank is already actively coordinating the release, and the need for more effective communication regarding certain products and services, in particular ceilings. Therefore, the Business Marketing Office, in collaboration with the Communication Office, decided to expand communication using different channels, including Branches, ATMs and brochures.

The results and observations that emerged from the survey were communicated to all Employees (both at headquarters and in the Network).

In addition to collecting interesting ideas for improving service, the survey also made it possible to concretely support medical-scientific research: for each questionnaire completed, Banca di Asti paid one euro to the Piedmont Foundation for Cancer Research in Candiolo.

To promote further engagement of consumers/end-users who participated in the "2023-2024 Business Survey" initiative, the Business Marketing Office launched the "Contattiamoli" commercial initiative. As part of the 2023-2024 Business Survey, 347 respondent companies gave their consent to the processing of personal data in order to be contacted. As a result, the "**Contattiamoli**" initiative was launched with the following purposes:

- establish contacts with Business Customers to strengthen and improve relationships, paying particular attention to cases in which Customers have reported a decrease in satisfaction with the Bank;
- engage in follow-up contacts to provide Business Customers with insights on issues of interest that emerged from the questionnaire.

To implement this five-month initiative, the Salesforce platform (CRM) was used between August and December 2024. The Business Marketing Office prepared a summary document containing the responses provided by Customers in the 2023-2024 Business Survey, which was subsequently distributed to relationship managers. After contacting each Customer, the manager updated the "outcome status" on



Salesforce, selecting different values based on the outcome of the follow-up contact and entering any explanatory notes and comments regarding the outcome of the contact. This function has allowed constant and periodic monitoring of the activity, facilitating the collection of feedback and useful ideas for mitigation of material risks and impacts, as well as improvement of the management of the relationship with Business Customers.

Each year, as part of the broader **Double Materiality analysis** process, the Stakeholder Perspective is also considered. To this end, an online questionnaire is administered to a selected sample of stakeholders, which also includes non-shareholder Customers and Shareholders. The latter are asked to provide their assessment of the materiality of the Group's impacts in terms of the well-being of people and the environment, both in relation to company operations and business activities. For further details, please refer to the section ESRS 2 SBM-2.

The **Customer Satisfaction** activity has also been carried out by **Pitagora** since 2010, in support of commercial, marketing, compliance and internal audit activities. On a weekly basis, surveys are submitted to all Customers settled the previous week, choosing between two alternative methods:

- through the SurveyMonkey platform for those who have provided an email address;
- through telephone interviews carried out by the supplier CX Centax S.r.l., regardless of the presence of the Customer's e-mail address in the system.

The survey, consisting of 18 questions with an assessment criterion ranging from 1 to 10, is aimed at understanding the level of Customers' satisfaction concerning some specific issues (such as the courtesy and professionalism of the person in charge, the clarity and transparency of the information received, the consulting received and the loan disbursement times), their assessment of the service offered and the assistance they received in the event of problems, and finally, the acquisition of some information about Customers in the banking/financial area. The results of the surveys relating to 2024, at the time of publication of this document, are not available as they are still subject to study and analysis. However, it should be noted that the 2023 Customer Satisfaction showed an increase in the NPS (*NET Promoter Score*) at 71.9% compared to 69.4% in 2022.

The following activities are instead carried out annually:

- definition of the Customer satisfaction survey process (sending method);
- determination of the questions of the "Satisfaction Driver" questionnaire related to the aspects of transparency in banking operations and assistance to Customers, to be used for the activation of the analysis process by the Internal Audit Office;
- sharing of the methods of analysis, processing and comment on the results obtained from the interviews.

During the year, Pitagora's Audit Service carries out a specific analysis that focuses on the negative assessments expressed by Customers with reference to the 3 questions in the questionnaire about transparency in banking operations (the so-called "Satisfaction Driver") reported below:

- clarity and transparency of the information received;

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

- financial consulting received from agents/the Company;
- quality of the assistance received, in the event of problems, from the head office and/or peripheral structures.

Subsequently, a telephone reperforming is carried out by the Service employees in order to identify the main reasons for inconvenience.

In order to analyse the degree of Customer satisfaction, the **"Customer Satisfaction"** service of **We Finance**, making use of an external supplier (Centax S.r.l.) to guarantee better objectivity of the resulting assessments, administers an assessment questionnaire by telephone to at least the 15% of Customers who benefited from the disbursement of a salary-backed or pension-backed loan. The result of the interviews is available to the Credit Function, which governs the Customer Satisfaction process, and is made available to the Internal Audit Function. This Function carries out an accurate assessment of the interviews with at least two negative judgements on the documentation received, or if the Customer indicates that they have incurred expenses, or if the Customer would not recommend We Finance to an acquaintance.

The free comments expressed by Customers are analysed in order to identify the real reason for the inconvenience through the subsequent telephone reperforming.

From an initial analysis of the responses obtained, still subject to study at the time of publication of this document, it was found that at least 94.9% of We Finance Customers interviewed would recommend the agent's work to an acquaintance.

The engagement of Customers is not limited to the collection of data and opinions, but also includes proactive communication through **DEM, SMS, website, social networks, telephone numbers and dedicated e-mail addresses, WhatsApp, letters to Shareholders, physical branches, events** and other direct contact initiatives. In this way, the Cassa di Risparmio di Asti Group adopts a Customer-oriented approach, constantly integrating the feedback received into the company strategy to ensure a continuous evolution of its services and to adequately respond to the needs of consumers.

The Group implements a series of systematic measures to better understand the opinions of consumers, paying particular attention to those who could be potentially vulnerable to impacts or marginalized, such as small businesses, disadvantaged communities and Customers with specific needs, including children and individuals with disabilities.

Among the initiatives underway, note the administration of annual questionnaires to a wide range of Customers, including businesses and non-profit organizations, to collect information on their needs and preferences and identify possible vulnerabilities.

In parallel, Banca di Asti is committed to ensuring the accessibility of its banking services for all Customers, with particular attention to those who are vulnerable. In this context, the Banking Centre service offers specialized remote assistance, with continuous support including during holidays when the Italian Stock Exchange operates, overcoming the limitations of the opening hours of the sales network and



guaranteeing direct interaction with the Customer for clear and personalized communication.

The services provided by the OnLine Branch allow the Bank to reach its Customers remotely, including those who are not yet Customers, helping to disseminate information on the products and services available. This approach guarantees even the most vulnerable people with mobility difficulties the possibility of activating and managing services remotely without the need to go to the branch, thanks to the use of solutions such as digital signatures and the use of new remote technologies and communication tools such as telephone, e-mail, SMS, WhatsApp and video calls with screen sharing.

Finally, to minimize as much as possible the effects of any fraud against vulnerable Customers, in the event of fraud reported by the Customer or inferred during the telephone conversation, the Banking Centre operators guide the Customer in revoking the fraudulent transfer or proceed with the recall for fraud, if revocation is not possible. The entire process was approved and authorized by the Bank's Risk Management and Compliance functions and is compliant with the communication of 17 June 2024 by the Bank of Italy concerning disavowals of unauthorized payment transactions.

Social inclusion of consumers and/or end-users

The Cassa di Risparmio di Asti Group considers fairness in relations with Customers as an integral part of sound and prudent company management.

The Group's culture is oriented towards satisfying the needs of Customers during all phases of the contractual relationship, with particular attention to cases in which dissatisfaction and potential conflicts may arise; in this perspective, the management of complaints represents an opportunity to restore a satisfactory relationship with the Customer and to preserve and consolidate existing relationships.

Proper management of complaints makes it possible to use the information that can be obtained from them to identify any margins for improvement in the processes adopted in the marketing of products, as well as any malfunctions of company processes and anomalous behaviour, so as to allow the adoption of corrective measures and increase the organization's ability to improve its products and services for Customers. With a view to paying the utmost attention to the management of any aspects that are critical issues, the submission of the complaint is followed by all the necessary initiatives to verify the event, implement any remedial actions and above all promptly re-establish a relationship of trust with the Customer.

The Bank makes "Customer Service" available on the institutional website through the toll-free number 800 998 060 and a dedicated e-mail address – servizio.clienti@bancadiasti.it – which allow Customers to request information, express suggestions or report any service problems.

Customer complaints can be sent to any Structure/Organizational Unit of the Bank or directly to the Complaints Office. Customers can use the contact details indicated in the transparency documentation or the guidelines published on the website and in the general contracts; they can send the complaint by ordinary mail, registered letter,

S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

fax or electronically (e-mail or certified e-mail), or can deliver the complaint directly to the branch where the relationship is held.

The complaint can also be submitted in other ways than those previously listed, or addressed to email accounts other than those indicated; in this case, it will be considered received when it is delivered to the Complaints Office.

The Group branches are also available to promptly resolve any problems and provide the necessary clarifications if the Customer intends to file a formal complaint or an appeal to the Banking and Financial Ombudsman (BFO) or the Arbitrator for Financial Disputes (AFD).

Information on the various complaint and out-of-court dispute resolution procedures is illustrated in the document entitled **"Complaints and out-of-court dispute resolution procedures"** on the Bank's website in the "Complaints" section. The **"Guide for use of the BFO portal"** and the **"Guide for the Arbitrator for Financial Disputes"** are also available in the same section of the website.

The management of complaints is assigned, on the basis of a specific decision of the Board of Directors, to the responsibility of the Complaints and Disputes with Customers Office, an organizational unit headed by the Compliance Function. This Service, by its very nature and by internal regulations of the Bank, is independent from the Company Departments responsible for marketing the products and services offered and depends directly on the top management, guaranteeing organisational and hierarchical independence in the management of complaints, in order to ensure independent judgement and impartiality in the resolution of disputes with Customers.

In order to allow compliance with the terms within which the required obligations must be carried out, all complaints received are recorded by the Complaints Office for subsequent registration activities. Once these obligations have been completed, the Complaints Office sends the Customer the communication of receipt and taking charge of the complaint, within a maximum of 5 days from the date of receipt of the same, unless, within the above-mentioned deadline, the response is sent directly to the complainant.

The Complaints Office promptly reports – by forwarding a copy – the complaint received by the Organisational Unit that maintains the commercial relationship with the Customer, also for the purpose of its involvement in the investigation phase of the complaint.

The assessment by the Complaints Office takes place autonomously, independently and free from conditioning, acquiring all the elements and documentation deemed necessary and appropriately relating with the other company functions, including those responsible for marketing the services, in order to promptly report any complaints received to the latter, also requesting a contribution from them – if necessary or appropriate – to better investigate the examination of the complaint.

The Complaints Office employee analyses the manner in which the complaint arose, its dynamics and the causes that generated it, carefully assessing the substantive issues (legal, accounting, behavioural, etc.) to prepare the response to the



complainant in compliance with the sector regulations and the guidelines of the arbitration boards consulted.

During 2024, Banca di Asti registered no. 225 complaints received between 1 January and 31 December, for the most part related to the execution of transactions, divided according to the classification of the different registers as follows:

- no. 191 ABI complaints (banking and financial services);
- no. 33 CONSOB complaints (in the finance area);
- no. 1 IVASS complaint (relating to insurance matters).

With reference to the 191 ABI complaints, the following outcomes were recorded:

- no. 137 not accepted;
- no. 11 partially accepted;
- no. 33 accepted;
- no. 1 withdrawn;
- no. 9 under evaluation.

Among the 33 CONSOB complaints, the following outcomes were recorded:

- no. 18 not accepted;
- no. 11 partially accepted;
- no. 2 accepted;
- no. 2 under evaluation.

The IVASS insurance complaint (1 complaint) was rejected.

The subsidiaries Pitagora and We Finance (hereinafter, jointly, the "Companies"), in line with the Group's provisions, consider the effective and efficient management of Customer complaints as a fundamental tool for (i) protecting and maintaining a relationship of trust with the latter, (ii) identifying any critical issue in the characteristics of the products and services offered or in the sales methods and, consequently, putting in place the due controls and the necessary corrective activities and (iii) reducing disputes.

The Companies therefore contribute, through training activities, to the dissemination of a corporate culture based on the principles of honesty, fairness and transparency in the management of relations with Customers.

The organisational unit responsible for managing complaints is independent from the company functions responsible for marketing the products and has operational autonomy on the individual complaints received in order to seek appropriate solutions, including on the basis of adequate knowledge of the reference regulatory framework.

The resources dedicated to handling complaints:

- are constantly updated on the sector regulations with reference to the products and services offered to Customers and the essential characteristics of the commercial offers proposed, as well as on the guidelines of the Banking and Financial Ombudsman, through the consultation of the electronic archive of the decisions of the committees published on the

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

relative website and on the reporting sent by the Banking and Financial Conciliator in relation to the most relevant ABF decisions;

- assess the complaints in light of the aforementioned guidelines, verifying whether the issue submitted by the Customer falls within similar cases already decided by the territorial committees and considering the solutions adopted in such cases;
- ensure the management of any complaints in compliance with internal regulations;
- periodically participate in training meetings and conferences relating to the main issues subject to the complaint, thus keeping up to date with the main regulatory, doctrinal and jurisprudential developments.

The total complaints received by Pitagora in 2024 equal to no. 2,039, of which no. 2 were accepted, no. 1,449 were partially accepted and no. 448 were not accepted; the remaining no. 140 are currently "under investigation".

We Finance received from 1 January to 31 December 2024 no. 164 complaints, of which no. 1 was accepted, no. 1 was partially accepted, no. 139 were not accepted and the remaining no. 23 are "under investigation".

The main subject of the complaints received (equal to 91.46% for Pitagora and 89.65% for We Finance) concerned the request for the repayment of costs not accrued following the early repayment of the loan pursuant to art. 125 sexies of the Consolidated Banking Act.

In compliance with the regulatory framework in force at the time, the Companies have implemented a dispute management policy in compliance with the transparency and supervisory provisions of the Bank of Italy, as well as the ABF Guidelines on early repayment of loans guaranteed by salary-backed loans or by means of delegation of payment.

In particular, the necessary measures were adopted to align with the reference legislation applicable from time to time, also as interpreted by the rulings of the European Union Court of Justice, preparing the appropriate actions aimed at enforcing the regulation of the early repayment of the loan to consumers, to protect its Customers and to mitigate legal and reputational risk.

To date, Immobiliare Maristella does not have channels that allow consumers and end-users to express concerns or processes to remedy negative impacts.

The Group has an active, highly personalized **Customer assistance system** which guarantees direct and timely support by avoiding the use of automatic responders. Thanks to this approach, it is possible to quickly resolve problems reported by Customers, identify areas for improvement in digital platforms and optimize the user experience.

In addition to the support provided directly by the branches in the area and the presence of a dedicated number for commercial information on products and services, banking Customers can also take advantage of remote assistance services for the purchase and subscription of products and services with digital signature,



provided by the OnLine Branch and a specialized assistance service available to private Customers regarding Internet banking services (desktop and app), provided by the Banking Centre.

Banking Centre

The Banking Centre is a consolidated entity within the Direct Channels and Communication Service, which offers Customers remote assistance and relationship services, in line with the Group's strategic policies.

Its mission is to provide specialized assistance to private Customers regarding Internet banking, desktop and app services, accompanying them in the use of multichannel services.

The service is active Monday to Friday from 8:00 to 22:00 and on Saturdays from 8:00 to 14:00, adapting to the needs of a large segment of Customers and exceeding the limits of the opening hours of the sales network. During holidays when the Italian Stock Exchange is operational, the Banking Centre offers Customers technical-operational assistance for entering securities purchase orders in the event of temporary failures of the system, from 8:00 to 18:00.

A feature of the service provided by the Banking Centre is the centrality of the direct relationship with Customers who have the opportunity to dialogue directly with the Bank's staff, without the intermediation of complex automated responders, chatbots or bots. The management of assistance within the Bank and direct contact with Customers also make it possible to:

- promptly detect any anomalies, reporting them to the technical department to obtain a rapid solution;
- identify areas for improvement of the digital platforms, which are reported to the Digital Channels Office, in order to simplify their operation and guarantee Customers a better user experience.

In order to maintain a high level of service to Customers even in times of greater number of reports, as in the case of the introduction of new functions on the platforms or unforeseen events, there is an active contract with an outsourcer – the company C-Global of the ION group – for the management of overflow, which in 2024 accounted for approximately 7% of inbound telephone traffic management.

The adoption of Service Cloud Voice, the Salesforce function that integrates Customer service in the cloud with the CRM, marked an important point in the technological evolution of the Banking Centre, producing the following positive results from the beginning, which have consolidated over the course of the 2024:

- a more fluid and streamlined management of the assistance service, deriving from the integration of multiple tools (telephone, trouble ticketing and Knowledge Base) into a single evolved cloud platform;
- the development of an overview and the strengthening of engagement by individual operators, who, thanks to the use of customized dashboards, consult metrics and KPIs in real time on the trend of reports, with which they can independently manage the rhythm of conversations and tasks such as dedicated calls requested by branches, and assess the opening of second-level reports, minimizing the intermediation of supervisors. This

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

implementation earned the Banking Centre the title of Best in Class in the People and Culture section of the annual 2024 Customer Service Maturity Model drawn up by the consulting company PwC in 2024, with a score of 78/100 compared to the average of 62/100 in the Banking industry;

- the reduction of onboarding times for new resources, from an average time of two weeks to five days, at the end of which the employee becomes totally autonomous in the management of less complex issues;
- the adaptation of the structure, extremely quickly, to carry out occasional activities: during the year, two contact and assistance campaigns were successfully carried out, concerning the mass replacement of Giramondo debit cards and the migration of POS devices to Numia.

In 2024, a survey was introduced aimed at monitoring the degree of satisfaction of the Customers to whom the assistance service is provided. This was achieved by sending a questionnaire via e-mail, containing a single question, with an invitation to express a vote from 0 to 10. From June, the date of introduction of the survey, to the end of the year, 34,648 e-mails were sent, with an average response rate of 26% and an average score of 9.31/10.

Within the CRM, a Customer Journey has been developed, after which the Customers who had contact with the Banking Centre following a generalized anomaly on the Banca Semplice Home and Info services, receive a specific communication via e-mail regarding the resolution of the same, guaranteeing the involved Stakeholders an instant update.

The future evolution of the Banking Centre envisages an ever greater centrality, thanks to the physiological increase in the use of direct channels and the need for Customers to have a remote reference available with extended hours. The following developments are being assessed:

- the expansion of operations on other services, such as:
 - the internalisation of assistance on Banca Semplice Corporate;
 - the management of claims relating to the Bank's car portfolio;
- the introduction of WhatsApp as a new communication channel, fully integrated with the CRM, aimed at offering a personalized, more efficient and high-value-added service to Customers, at the same time increasing accessibility to the assistance service (for example to deaf and mute users);
- the use of artificial intelligence in pilot mode for the updating and automatic implementation of the Knowledge Base available to office staff, in line with the objective of making agents increasingly autonomous and involved in the creation of value solutions available to the entire team;
- the introduction of an automatic voice response system – conversational IVR – through which the Customer can directly communicate their needs to be put in contact with the most suitable operator, without having to choose the desired option on the telephone keys;
- the segmentation of Customers, in order to create a preferential channel for premium Customers;



- the continuous improvement of Cloud Voice Service with the adoption of new functions aimed at streamlining operations for operators and with positive repercussions on service levels to the benefit of Customers.

OnLine Branch

The OnLine Branch aims to manage the remote relationship with private Customers, offering increasingly innovative solutions through the use of new technologies and remote communication tools such as:

- Telephone;
- E-mail;
- SMS;
- WhatsApp;
- Video calling and screen sharing.

This is a real branch, made up of personnel with previous experience in the agencies, which operates on extended hours (Monday to Friday from 8:00 to 19:00) serving both the branches and the Customers of Banca di Asti who are holder of an Internet Banking product, and for non-Customers by offering the possibility of opening an online current account from the Bank's website.

With the OnLine Branch, a series of additional services focused on the use of digital signatures were introduced, which are being progressively enhanced: in fact, through their Internet Banking, Customers can request banking products, renew identification documents for anti-laundering purposes and sign contracts completely online.

From this point of view, the OnLine Branch particularly takes care of the relationship with Internet Banking users, in order to guide and support them in the purchase of new products and in the remote subscription of documents with digital signature, integrating and extending the service already provided to the same Customers by the local branches in a multi-channel perspective.

With regard to the design activities and innovation of its services, in 2024 the OnLine Branch worked on completing the analyses and testing of the main functions to enrich the online channel and the digitalisation and multichannel processes of the Bank. The objective is to release during 2025 and progressively in the following years:

- the improvement of the Customer's signature experience, moving from the use of three-year qualified digital signature certificates with PIN (Personal Identification Number) and OTP (One Time Password via SMS) to those with only the use of the OTP;
- the revision of the "Per te" [For You] section of the Internet Banking app. The objective is to convey the Bank's services in a more modern and multi-channel perspective, allowing the Customer to interact with the OnLine Branch and with the agencies in a simpler and more immediate way;
- the revision of the process of opening an online account from the Bank's website, making it more intuitive and faster with the possibility of using SPID for identification, extending the opening functions also to a specific digital collection product;

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

- the improvement of internal processes in order to allow the remote subscription with digital signature of multiple products and services, also in the corporate area.

The services provided by the OnLine Branch allow the Bank to reach its Customers and non-Customers remotely, contributing to the dissemination of information relating to the products and services offered and also guaranteeing to challenged subjects with mobility difficulties the ability to activate and manage them remotely without the need to go to the branch.

Already today, the voice of the Customers who come into contact with the OnLine Branch is an important tool for inclusion, listening and a fundamental cue for the continuous improvement of the procedures, processes and services provided. For this reason, starting from 2025, the plan is to introduce systems for collecting objective qualitative and quantitative feedback through the administration of surveys to Customers who come into contact with the OnLine Branch.

Impacts related to information for consumers and/or end-users

Each Group Company, in compliance with the provisions of the GDPR, in the event of "incidents" regarding the Processing of Personal Data, shall notify, without delay, the Guarantor of the breach unless it is unlikely that the breach entails a risk for the rights and freedoms of the Data Subjects. This risk occurs when the Data Breach involves the onset or aggravation of damages, such as loss of control of Personal Data, discrimination, theft or usurpation of identity, financial losses, unauthorized decryption of pseudo-anonymization, damage to reputation, loss of confidentiality of Personal Data protected by professional secrecy or any other significant economic or social damage.

If the breach presents a high risk for the rights and freedoms of the Data Subjects, the Group Companies must notify the Data Subjects, unless one of the following conditions is met:

- the data controller has put in place the appropriate technical and organisational protection measures and these measures had been applied to the personal data subject to the breach, in particular those intended to make personal data incomprehensible to anyone not authorized to access it, such as encryption;
- the data controller has subsequently adopted measures to avoid the occurrence of a high risk for the rights and freedoms of the data subjects;
- such communication would require disproportionate efforts. In this case, a public communication or a similar measure through which the data subjects are informed with similar effectiveness is carried out.

The assessment process includes:

- the collection of information relating to the incident;
- assessment of the incident as material for the purpose of being classified as a Data Breach;
- assessment of the need to notify the Guarantor and communicate with the Data Subjects.



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

The Bank provides consumers and/or end-users with various channels for communicating concerns, needs or sending reports, including Customer assistance channels (Banking Centre/Customer Service/OnLine Branch), monitoring of responses received by the DEMs sent in order to intercept any reports, continuous dialogue with the Sales Network including through the Area Managers, and Customer satisfaction surveys.

Based on the evidence and reports received, the main negative impacts (risks) for each cluster of Customers are identified. This is followed by the analysis and development of actions, products and services aimed at protecting the Customer and reducing the associated risks.

These channels are effective in that they operate in compliance with the privacy of the Customer, have clear and transparent procedures, and are accessible to both external Customers and Collaborators, thus facilitating the monitoring and collection of reports. The Group ensures that consumers and/or end-users are informed of the existence of these channels thanks to the following factors:

- all contact details (OnLine Branch/Banking Centre/Customer Service) are available on the Bank's website (freely accessible to the public) and on the Home Banking app (OnLine Branch/Banking Centre);
- the surveys and DEMs are delivered directly to the Customers' email address, and monitoring is carried out to determine which ones are correctly received and which ones are discarded (due to errors in the email address);
- the Branches are freely accessible during opening days and hours, also through dedicated contacts (telephone, e-mail).

For more information on additional processes activated to mitigate any negative impacts on end consumers, as well as on other channels available to them to express concerns and receive assistance, please refer to section S4-2.

The Cassa di Risparmio di Asti Group has adopted a series of targeted actions to prevent, mitigate and remediate material negative impacts on consumers and end-users, with particular attention to security, inclusiveness and service quality.

Firstly, given the intensification of cyber threats aimed at the theft of personal and financial data in recent years, Banca di Asti continued its awareness-raising educational campaign directed at its Customers and Employees in 2024, in order to spread a culture of personal data protection, with the goal of increasing awareness about attempts at digital scams and increasingly widespread IT fraud.

By preparing a Customer Journey by means of periodic monthly e-mails to Customers who hold an Internet Banking account and the publication of clear information documents and video tutorials on the institutional website, the Bank wanted to provide its Customers with the appropriate tools to defend themselves against any fraud and protect their digital identity.

The Group has also implemented specific actions for at-risk groups of consumers, such as minors, young adults, pensioners and financially disadvantaged individuals. Among the initiatives adopted are current accounts with limited operations for minors, a specific application to check whether the communications received from

S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

Customers have actually been sent by the Bank, and dedicated low-cost current accounts for vulnerable subjects, in order to protect financially disadvantaged Customers with low economic resources. For employees, internal controls have also been introduced to ascertain the reliability of the declarations provided by external business partners. Other actions taken to protect consumers are the inclusion of legal notices in all commercial advertisements and the organisation of initiatives and conferences to stimulate dialogue and discussion on various topics such as sustainability.

With regard to digital services, the implementation of advanced security measures, such as the limitation of autonomous use of the app on new devices and the addition of an additional verification factor to combat the phenomenon of telephone spoofing, has guaranteed even greater protection against fraud.

Lastly, constant innovation and the expansion of the offering of remote assistance and relationship services in response to the demand for greater flexibility and accessibility have made banking services even more secure and usable, improving the Customer experience. In 2025, the Group plans to introduce new surveys to ensure that services always remain aligned with the needs of Customers, thus contributing to improving the effectiveness of risk mitigation and prevention actions.

Banca di Asti intends to support financial education for local businesses, in order to accompany them in a cultural change that can facilitate the green transition and allow them to grow, seizing all the opportunities related to the world of sustainability.

Therefore, conventions, workshops, training courses and informational events were organized in which Customer companies, representatives of local businesses and Employees of the Bank took part. These meetings were conceived as opportunities for in-depth analysis, reflection and sharing of experiences on issues of greatest interest, also making it possible to clearly and transparently illustrate the Bank's main solutions in support of companies to promote a culture of sustainability and facilitate the integration of sustainable practices into companies' business models.

For more information, please refer to section S4-2.

In summary, thanks to an integrated approach that involves all areas of the Group, concrete actions have been taken to ensure responsible risk management, with constant improvement of the services offered, paying particular attention to consumer protection and digital innovation. For further details in this regard, please refer to section S4-2.

It should be noted that Immobiliare Maristella, given the specific nature of its business, does not have the processes described above aimed at intervening on material impacts and mitigating material risks in relation to consumers and end-users.

The Group has launched several additional initiatives aimed at improving social results for the benefit of consumers and end-users, through activities ranging from


**SUSTAINABILITY
STATEMENT**
**SOCIAL
INFORMATION**

sustainability to digitalization, with a strong commitment to the local community and future generations.

In the context of inclusiveness and support for new generations, the Group has launched numerous programmes. Banca di Asti has chosen to re-propose the SBAM initiative, dedicated to young people aged between 18 and 30 who are becoming customers of the Bank for the first time and who, by opening their first account, have the opportunity to choose from among a series of exciting, educational, fun or training experiences reserved for them.

The Bank also wants to stand alongside the new generations, supporting young students in their path of growth and helping them to achieve their future ambitions. To this end, a new commercial campaign called "...studiamo con Erbavoglio!" [...let's study with Erbavoglio!] was launched in March 2024, which offers subsidized loans to students wishing to undertake higher education courses.

Starting from 1 January 2024, the new commercial campaign "...muoviamoci con Erbavoglio!" [...let's move with Erbavoglio!] was also launched, a loan with a dedicated favourable rate to promote the purchase of sustainable vehicles, full-electric or new or used hybrid vehicles from a dealership, choosing between a car, a motorcycle/electric bike, a bicycle or a scooter.

In February 2024, the Bank joined the Mortgage Guarantee Fund for the First Home (Consap), enriching its commercial offering and at the same time contributing to consolidating the image and relationship of the Bank in the territory by responding to the credit access needs of young/single-parent families from an ESG perspective as well.

Lastly, Banca di Asti allocated capital for the creation of 12 ceilings for Mortgage Loans to Individuals, each with different characteristics and subsidized rates, aimed at financing different categories of properties and recipients, responding to the needs of several categories of Customers (young people, buyers of sustainable properties or Customers who want the peace of mind of a predetermined maximum rate).

For further details on the products and services offered by the Group, please refer to the section ESRS 2 SBM-1.

The Group also paid particular attention to the sustainability of businesses, promoting training events and conferences on the issues of ecological transition and social responsibility, including two major events that involved leading experts and institutions. In addition, there are workshops dedicated to local businesses, focusing on sustainability and the opportunities offered by the Transition Plan 5.0. Moreover, to respond to the challenges of the market and provide an increasingly highly qualified service to its Customers, specific training courses have been provided to Business Managers, Green Managers and Business consultants on sustainability issues, in particular on the impacts of the CSRD and on the changes that companies will have to undergo in the future to adapt their business model to the standards required by the regulations and remain competitive on the market. Similarly, some market research was carried out, aimed at gathering information on new market trends and on the products/services most requested by consumers/end-users.



With the aim of increasing the inclusiveness and accessibility of banking services, Banca di Asti offers remote digital services, not only through the services offered by the Banking Centre and the OnLine Branch, but also through the Digital Channels, guaranteeing constant and multi-channel support accessible to all Customers, including those who prefer to interact remotely.

Digital Channels

The Group has been operating for several years with a view to developing digital services, combining local roots through the widespread presence of the physical network with the enhancement of telematic channels. The Internet Banking service provides the user with the following functions:

- information functions on current accounts, savings deposits, securities deposits, brokered policies and loans;
- operating functions on own current accounts and securities deposits;
- consultation function via bank communications in electronic format;
- purchase functions of products offered to target Customers;
- remote signing of bank documents through digital signature.

These services thus make it possible to achieve savings on the costs and time of management of paper bank documentation, to reduce waiting times linked to operations at the physical branch, to view current account balances and transactions and to operate wherever the Customer is located also through the app, thus providing a better and more efficient service. At the same time, the "Banca Più" service is available among the electronic services, which is aimed at all private Customers who hold debit cards, offering the possibility to carry out queries and order transactions autonomously at all advanced automatic stations.

The Cassa di Risparmio di Asti Group adopts a variety of methods to monitor and evaluate the effectiveness of actions and initiatives aimed at consumers and end-users, constantly striving to ensure that the solutions proposed meet the needs and expectations of the public.

The monitoring of activities is carried out not only through the analysis of indicators such as the communications sent to Customers that are opened and the number of new current accounts opened or loans disbursed, but also thanks to the direct feedback obtained through surveys and performance analyses. In this regard, a significant example is the "Contattiamoli" initiative, which involved managers in collecting and updating Customer responses. The use of digital tools, such as CRM dashboards, facilitates the monitoring of interactions and makes it possible to optimize the user experience in real time, improving communication with Customers.

With regard to the points of contact with Customers, both in the branch and online, Customer satisfaction is constantly monitored through feedback collection tools, such as surveys and questionnaires sent after the interactions. For example, the Business Survey provided valuable information as it highlighted Customers' interest in sustainable financial solutions, giving rise to initiatives such as the Sustainability Linked Loan.



The adoption of customized dashboards and real-time monitoring systems makes it possible to promptly identify areas for improvement and implement interventions to optimize the services offered. The response rates to the surveys, which stand at positive values, together with the performance indicators of the various channels, therefore testify to the effectiveness of the initiatives implemented, contributing to the continuous improvement of the service. For more details, please refer to section S4-2.

The Group constantly invests in **IT security** to develop solutions that offer an efficient and secure service for its Customers. In this regard, the Home Banking services offered by Banca di Asti to retail and corporate Customers integrate strong customer authentication systems (SCA) software token and secure call.

Authentication via software tokens is the standard for the retail service, while the secure call is used exclusively for the Corporate Banking service.

The new Corporate Banking platform will make it possible to set authentication via software tokens as default, allowing both retail and corporate users to use secure calls as an alternative in cases of unavailability of compatible devices or other technical impediments.

Software Token - SmartOTP

Through static credentials (identification element) the user, upon first access to the service on a device not yet configured, is guided to verify their identity through an OTP code sent to the telephone number registered and associated to the user during subscription of the contract (ownership element).

During configuration, the user will generate a PIN that will be requested at each access or at each order operation, activating the software component to provide the dynamic OTP authorization. This code will be sent through the configured app and through the data network if available, or entered manually where the authenticator device is offline.

As static credentials, User, Password and PIN may be saved in the security data of the mobile device, accessible and attributable in the relative application both during access and when authorizing a transaction order through biometric recognition, where present and configured by the user.

Secure Call

By entering the static identification credentials (identification element), the user is first guided to make a security call to verify their identity on the telephone number registered and associated with the user during the subscription of the contract (ownership element), and then in the same call the user is invited to enter the authorizing OTP with the numeric keypad both for access authorization and for order operations.

With regard to **anti-fraud monitoring**, the Bank keeps its control system constantly updated, in order to analyse in real time all the transactions carried out by Customers through digital channels and therefore guarantee an adequately high level of security for Home Banking services. Specifically, in 2024 the Transaction Risk

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

Analysis anti-fraud service was introduced and enhanced to be more complete than the previous one, also provided by the outsourcer Cedacri. This identifies suspicious transactions and operating behaviours such as, for example, payments to beneficiaries with black-listed IBANs or carried out from black-listed IPs, or transactions that deviate from the usual or expected behaviour of Customers on the digital channel. If a transaction order is intercepted with a risk level above the threshold based on the aforementioned criteria, it would be immediately blocked and not finalized.

In order to limit the effects of any fraud against Customers as much as possible, in addition to the permanent adoption of an operation that limits the possibility for the Customer to configure the app independently on new devices, the process of identification was revised by making it more streamlined (reduction of questions) and maintaining the focus on the essential elements to guarantee the security of the Customer and the operator (addition of a factor that certifies the identity of the Customer, in response to the practice of telephone spoofing).

With the aim of guaranteeing not only a high standard of security in the services offered, but also a relatively secure and recognizable operating environment, Banca di Asti has an anti-phishing service, made available by an external supplier, which intercepts fraudulent campaigns on the web that are damaging to the Bank, and makes malicious links replicating pages of the institutional website and the portals for accessing the Bank's electronic services unreachable.

Given the intensification of cyber threats aimed at the theft of personal and financial data in recent years, Banca di Asti continued its awareness-raising educational campaign directed at its Customers and Employees in 2024, in order to spread a culture of personal data protection, with the goal of increasing awareness about attempts at digital scams and increasingly widespread IT fraud.

With the preparation of a Customer Journey by means of periodic monthly e-mails to Customers in possession of an Internet Banking account, in addition to the publication on the institutional website of clear information documents and video tutorials, the Bank wanted to provide its Customers with the appropriate tools to defend against any digital fraud such as "social engineering", "sim swap", "phishing" via e-mail, "smishing" via SMS or "vishing" via telephone, particular types of scams by means of which an attacker tries to deceive the victim by convincing them to provide personal information, financial data or access codes by pretending to be a reliable entity in a digital communication.

To this end, Banca di Asti has also joined the 2024 European Cybersecurity Month campaign promoted by the European Union Agency for Cybersecurity – ENISA. In October, insights and suggestions for acting securely inside and outside the branch and protecting oneself from frauds and scams were published on the social pages and institutional website. In fact, it is fundamental to recognize dangerous situations and act promptly, since new attempts at fraud, especially in the banking sector, leverage the emotions, situations of risk, need and danger of loved ones, pushing people to trust unconditionally.

Lastly, Banca di Asti participated in training and awareness-raising initiatives regarding cybersecurity at schools.



**SUSTAINABILITY
STATEMENT**

**SOCIAL
INFORMATION**

The Group companies continue to invest in the evolution of cybersecurity processes and technological measures to maintain a high capacity of defence and reaction in the event of any IT security incidents. For this reason, the Group has planned the following developments for the year 2025:

- an optimization process required by the European Regulation DORA (Digital Operational Resilience Act), which entered into force on 17 January 2025, with particular attention to the following points:
 - extension of security and resilience tests, with related remediation plans;
 - activation and extension of data classification solutions;
 - activation and securing (through cryptographic or similar solutions), in a progressive and risk-based logic, of confidential and/or strictly confidential data;
- completion of the company network at Pitagora;
- completion of the adoption of the Cisco 802.1X Network Access Control (NAC) standard, which will be activated on all Pitagora network switches, guaranteeing the management and control of all accesses to the physical network. Through a series of rules set on the management server, it will be possible to grant access and assign the right addressing to anyone who connects to the physical network. If an unauthorized device attempts a connection to one of the switches, at the main office or at an agency, it will be excluded from the network at the physical level;
- the conclusion of the technological migration process aimed at the centralization in Pitagora/Cedacri of the mail client and the file server provided by the technological outsourcer Logos Technologies in use in We Finance.

The approach structured by the Group for identifying the actions to be taken in response to negative impacts on consumers and end-users, both actual and potential, is aimed at ensuring rapid intervention and the minimization of problems. The process begins with the constant monitoring of interactions with Customers, carried out through various channels, including direct feedback, internal reports and data from digital platforms. When a negative impact occurs, it is analysed and assessed to identify the most appropriate response, which may vary according to the nature of the problem.

If the impact concerns the quality of the products or services offered, the Group implements corrective measures, such as the improvement of existing products or the introduction of new tools to better meet the needs of Customers. For example, in the event of problems related to digital scams, awareness-raising campaigns are activated to inform Customers about the risks and most effective security practices. Similarly, in the event of difficulties with banking services, such as those online, internal reviews are initiated to optimize the user experience, simplifying access and improving functionality.

Another important element is the periodic monitoring of products, such as current accounts, which includes the analysis of complaints to identify any critical issue. In

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

these cases, a data analysis process is activated to verify whether the needs of Customers are fully met and, if necessary, new tools or changes to the services offered are introduced. In addition, the effectiveness of the actions taken is constantly assessed through satisfaction surveys, which allow direct feedback from Customers to be collected and adjustments to be made in real time. For further details, please refer to section S4-2.

The Cassa di Risparmio di Asti Group adopts a comprehensive and integrated approach to address negative impacts on consumers and end-users, placing particular emphasis on security, accessibility and protection of Customer data. The initiatives undertaken range from the design of products to their marketing, and to the management of problems relating to fraud and improper practices. The Group has activated constant and targeted communication channels, such as the "information snippets" periodically sent to Customers to raise awareness of the risks associated with scams. It has also developed solutions to protect specific vulnerable categories of Customers, including minors, young people, pensioners and financially disadvantaged individuals, introducing products at low costs and with limited operation. Awareness-raising initiatives, such as the "Let's study with Erbavoglio!" campaign for young students, together with the offering of sustainable and inclusive products, represent further concrete steps towards improving the Customer experience and strengthening the relationship of trust with Customers.

At the same time, the Group has introduced measures to improve the accessibility and security of its services, such as the strengthening of Customer identification processes and the adoption of innovative technologies to prevent fraud.

In general, the approach adopted by the Cassa di Risparmio di Asti Group stands out for its proactive approach in protecting consumers and supporting Customers, integrating individual actions and sector collaborations to ensure greater security and better financial well-being for all.

With reference to the mitigation of risks relating to privacy, sensitive information and inclusive consumer access to the products and services offered by the Group, the Privacy Function held training sessions for all newly recruited personnel. During these courses, the topic of the processing of personal data related to the designation as "Person authorized to processing" carried out by the Privacy Delegate was explored, further confirming the high level of attention that the Group places on these issues.

In 2024, at Banca di Asti the position of Privacy Delegate was held by the Head of the Legal and Corporate Affairs Service, while the DPO (Data Protection Officer) position was held by the Head of the Legal Office.

Annually, the Privacy Delegate and the DPO report to the Board of Directors any critical issue relating to any complaints or irregularities in terms of privacy that emerged during the previous year.

During 2024, Pitagora continued the activities necessary to fulfil the obligations envisaged by Regulation (EU) 2016/679 ("GDPR"), by Legislative Decree no. 196 and subsequent amendments ("Privacy Code"), as well as the provisions and guidelines of



the Guarantor for the protection of personal data ("Guarantor") and the European Data Protection Board.

In detail, the following activities were completed during the reporting period:

- updating of the disclosure relating to the processing of Employees' personal data, acquiring any declarations of consent to the use of their image through online forms, as well as the disclosure for candidates, visitors, and participants in the training and/or promotional events organized by the Company. In addition, the disclosures provided by some partners who signed commercial agreements with Pitagora for the purpose of communicating the personal data of potential Customers for marketing purposes were examined;
- update of the authorization document that contains the limits and instructions regarding the processing carried out by Employees as part of their duties;
- preparation of the documentation to be provided to the data subjects in relation to the processing of data through video surveillance systems.

In addition, Pitagora checks periodically the Public Register of Objections.

With reference to We Finance, activities continued to verify the documentation relating to privacy obligations.

In particular, (i) the authorization document was updated, which contains the limits and instructions regarding the processing carried out by Employees as part of their duties, as well as the disclosure relating to the processing of Employees' personal data, (ii) the disclosures provided by some partners who signed commercial agreements with We Finance for the purpose of communicating the personal data of potential Customers for marketing purposes were examined.

With regard to both Pitagora and We Finance, the audit activities of the Data Protection Officer and those carried out by the Internal Audit Service were launched in 2024.

Furthermore, the Group conducted an in-depth analysis of the Provision of the Guarantor for the protection of personal data of 6 June 2024, "Guideline Document. IT programmes and services for the management of e-mail in the workplace and processing of metadata", and a document relating to the retention of the data subject to the Provision is being drafted in accountability.

In 2024, the Cassa di Risparmio di Asti Group received no reports of serious problems or incidents relating to human rights related to consumers or end-users. The Group adopts preventive measures to protect the rights of Customers, including strengthening security processes, adopting transparent practices in the marketing of products and ensuring that services are accessible to all categories of users, including individuals with disabilities.

The Cassa di Risparmio di Asti Group constantly devotes resources to the management of material impacts on consumers and end-users, thus guaranteeing a structured and coordinated approach.

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

The Group is sensitive to the issue of training and empowerment of Employees in the field of IT security and for this reason the following training courses were prepared during the year:

- "Protecting digital identity, data and personal devices";
- "Password protection, phishing, social engineering";
- "Cyber Security";
- "Cyber Awareness".

With regard to Business Continuity, specific classroom sessions were also held with the involvement of all the resources in charge of critical processes, in order to raise awareness about the management of various crisis scenarios, and the processes for escalation, involvement and communications in emergency situations.

In addition, to strengthen awareness of IT security issues, the path activated in 2023 at the Group level through the CyberGuru platform continued with the following functions:

- simulations of "phishing" with e-mails addressed to the entire company population. Unsuitable actions are highlighted and explained to the operator to avoid their recurrence;
- Cyber Security Channel, a dedicated channel with training videos aimed at increasing awareness and skills on critical IT security issues such as password security, social engineering, and Wi-Fi network security. The e-learning modules are used to strengthen phishing simulations in order to make the company population aware of the potential threats that may occur specifically in the workplace.

Lastly, specialist training was carried out for all personnel of the ICT and Security Function.

Particular attention is also paid to the training of Banking Centre personnel. In fact, individual courses are carried out concerning various areas, from technical training on products and on the use of tools to those required to obtain and/or maintain specific certifications (for example in the financial or insurance field). In addition, ample space is given to continuous training on soft skills (structured in two sessions per year, consisting of small groups, and at least one in-person session with all staff). This focus is essential for reinforcing the spirit of belonging, improving communication and listening skills and strengthening specific aspects such as empathy, patience, and the ability to manage long-distance relationships and conflicts, thus ensuring that personnel are prepared to promptly address any problems.

In addition, the Group has implemented advanced security systems for the protection of personal data and the prevention of fraud, in addition to resources dedicated to compliance with current regulations, as well as contracts with outsourcers to manage any overflows caused by unforeseen events and support the Banking Centre's assistance services.

In the area of technology, the adoption of advanced tools such as customized dashboards and the integration of Salesforce with CRM allows personnel to monitor reports and KPIs in real-time, guaranteeing rapid and effective responses. Specific resources are also assigned to the management of business processes, including



experts in Customer support, compliance and data security who constantly work to improve the Customer experience and reduce the associated risks. The collection of feedback from Customers through surveys and monitoring tools allows the Group to promptly identify and address any critical issue, adapting its practices to the regulations and suggestions received. These resources are managed in an integrated manner, in order to ensure that negative impacts are kept to a minimum and a prompt and effective response is provided in every situation.

Metrics and targets

The Group, based on the needs of consumers and end-users and in line with the Group's strategic policies, defines specific targets aimed at reducing negative impacts, enhancing positive impacts and managing material risks for consumers and end-users.

The Stakeholder engagement process consists of a continuous dialogue with individuals or groups who have an interest in the Group's activities or who could be positively or negatively influenced by them. The objective is to actively engage the main stakeholders, collecting their expectations and concerns in order to integrate them into the company strategy, building and maintaining transparent and collaborative relationships and ensuring the sharing of clear information about the company's activities, choices and impacts.

The Group engaged a sample of Stakeholders, including Shareholders and Customers, through an exploratory online survey functional to the preparation of the Double Materiality Analysis. The results of the survey conducted, which asked participants to analyse the significance of various impacts on company operations and on the business concerning people and the environment, were taken into consideration in defining the strategic objectives of the 2025-2027 Sustainability Plan, so that they expressed consistency both with the preferences expressed by the Stakeholders and with the strategic directives of the company.

The constant monitoring of the pre-established objectives is a fundamental activity to ensure their full achievement within the established times and to make any remedial actions. For more details on the Sustainability Plan, please refer to section ESRS 2 GOV-1.

The targets defined in relation to consumers and end-users, according to the provisions of the 2025-2027 Sustainability Plan, are reported below. These targets reflect the principles and values expressed in the Group Sustainability Policies and in the Code of Ethics according to which "the Group, recognizing the centrality of Customers, is oriented towards fostering a professional, transparent and lasting relationship, with a "linear" offering of products and services aimed at satisfying the needs of the Customer and to achieve mutual economic benefits."

Specifically, the targets represented below are aligned with the objectives of the policies related to the management of consumers and end-users, and are an integral part of the Sustainability Strategy in support of the satisfaction and well-being of Customers.

S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

SOCIAL
INFORMATIONSUSTAINABILITY
STATEMENT

ESRS – Sub-topic	Target	Final target	Base year	Achievement year	Actions	Perimeter
S4 – Consumers and end-users <i>Impacts related to information for consumers and/or end-users</i>	Build consumers' awareness and sensitivity to ESG issues	Development of commercial/marketing communication campaigns based on the needs of Customers, the Bank's ambitions and market developments (e.g. for the launch of new products and/or renewal of ceilings)	Base year: 31/12/24	2025 2026 2027	Issue of press releases, periodic communications, newsletters, information pop-ups, publication of content on the company website, statements and social media posts related to ESG issues	Banca di Asti
S4 – Consumers and end-users <i>Social inclusion of consumers and/or end-users</i>	Support for the territory in which the Bank operates by sponsorship of social, sporting and cultural events and activities	Contributions to support social, sporting and cultural initiatives for at least 75% of the total budget assigned annually to promotional projects	Base year: 31/12/24	2025	Identification and sponsorship of local events (e.g. festivals, historical celebrations, etc.), and charitable, social, sporting or cultural initiatives	Banca di Asti

To consult the 2022-2024 Sustainability Plan, with reference to the objectives and targets set for 2024, please refer to section ESRS 2.



G1 – BUSINESS CONDUCT

Impacts, risks and opportunities management

"To be a modern, fast and flexible commercial Group, capable of competing with excellence in its market (households and small-medium enterprises), seeking to build a lasting relationship with the Customer to achieve mutual economic benefits".

G1-1 – Corporate culture and business conduct policies

The Group, in compliance with its mission, operates according to the values of loyalty, attention, listening to the Customer and the territory, fostering a professional, transparent and lasting relationship with an offering of products aimed at satisfying the needs of the Customer, and by promoting the professional growth and enhancement of internal human resources.

Legality, fairness and strict formal and substantial compliance with regulatory obligations and professional duties are promoted by the Cassa di Risparmio di Asti Group as guiding principles of all the activities carried out, as stated in the **Code of Ethics and Conduct** adopted by the Group and in accordance with the provisions of the **Organisational and Management Model pursuant to Legislative Decree 231/2001** and the **Group Regulation on internal reporting of violations (Whistleblowing)**.

The guarantee of timely and transparent communication of the state of implementation of the strategies and the results achieved is recognized to all Shareholders, without any discrimination and without preferential behaviour. Furthermore, the Shareholders, as indicated in the Code of Ethics in the specific section dedicated to them, have the opportunity to exercise their rights of democratic control, to be heard and to obtain the benefits they are entitled to.

Professionalism, legality, transparency, fairness and good faith are the essential conditions for the protection, reliability, reputation and image of the Group. In fact, specific actions were taken to spread the culture of risk management internally, as well as to strengthen the direct inclusion of line controls in IT procedures, to adapt and implement risk management activities, to strengthen techniques of remote control and to guarantee the separation between the operational functions and control functions in terms of organisational structure and authorizations of access to the procedures.

The key principles by which the Group is inspired, defined in the Code of Ethics, concern various areas, including, in particular, the following:

- promote a culture of legality, fairness and strict compliance with regulatory obligations and professional duties;
- maintain the utmost moral integrity, both in the workplace and outside it;
- carry out its activities with the utmost professionalism and diligence;
- focus its activities to the protection and centrality of the person, promoting respect for human dignity and combating all forms of discrimination;



- respect and protect the environment and the safety in the workplace, taking the ecological issue into account in management decisions and preserving, especially through preventive actions, the health and safety of Employees.

These principles guide the Group's work with particular strength and incisiveness in relations with Customers, Employees and Collaborators, the Public Administration, the Supervisory Authorities and the Judicial Authorities, the Political and Trade Union Organizations, the Local Community and Information Bodies, as well as in the selection of and relations with Suppliers.

The Recipients of the Code are required to scrupulously comply with the provisions contained therein, and for this reason the Group Companies undertake to ensure:

- the maximum dissemination of the Code, also through publication on their website and/or Intranet;
- the preparation of instructive, explanatory, information/training and awareness-raising tools with reference to the contents of the Code. In particular, knowledge about the Code must be developed during the usual personnel training courses, clarifying its content and methods of application;
- the performance of periodic audits in order to monitor the degree of compliance with the provisions contained in the Code;
- the constant updating of the Code, in relation to the economic, financial and commercial evolution of the Group's activities as a whole, to any changes in the organisational structure or operational structure, as well as in relation to the types of violations found in the context of control activities;
- the forecasting of adequate prevention tools, the enforcement of suitable sanctions, as well as the timely application of the same in the event of an ascertained violation of the provisions of the Code.

A copy of the Code of Ethics is made available, by the General Management, to each new Director, Statutory Auditor, Employee or External Collaborator at the time of appointment, recruitment or start of the employment/collaboration relationship, with the commitment to communicate any updates and/or changes using the means deemed most appropriate.

In addition, in contractual relations with Suppliers, Partners, Consultants and other third parties, the Group undertakes to require third party contractors to comply with the provisions of the aforementioned Code, expressly specifying, to this end, their acknowledgement and knowledge of it in each contract.

Another tool to monitor lawful conduct is the adoption by the Group of an internal reporting system ("Whistleblowing"), which aims to prevent the occurrence of irregularities within the organisation and to involve all Stakeholders in an activity to combat illegality through active and responsible participation.

To this end, the Group Companies have set up a platform that is compliant with the EU Directive, the GDPR and Article 4 of Legislative Decree 24/2023 for the reporting of corporate offences, guaranteeing the possibility for all interested parties to promptly communicate any unlawful behaviour through the "Comunica



Whistleblowing" portal, in a secure and confidential manner. This channel is considered preferential and suitable for guaranteeing, with IT methods, the confidentiality of the identity of the whistleblower. In addition, the following additional reporting methods have been activated in order to guarantee greater choice to the whistleblower:

- hand delivery to the Head of the internal systems for reporting violations or to the alternative Contact Person, using the form in the "attachments" section;
- verbal statement issued to the Head of the internal systems for reporting violations or to the alternative Contact Person, through a telephone line or through a direct meeting set within a reasonable time, recorded and signed by the whistleblower;
- compilation and sending of the paper reporting form with the ordinary postal service or using the company internal mail: form to be sent in a closed envelope addressed to the Head of the internal systems for reporting violations (Head of the Internal Audit Service or Head of the Audit Function for Pitagora and We Finance) or to the alternative Contact Person (Chairman of the Board of Statutory Auditors) with the words "Personal and Confidential", and an additional envelope must be inserted inside the envelope containing the report with the words "Whistleblower" with the duly completed paper form, any documentation supporting the report, and accompanied by a photocopy of an identification document.

The Head of the internal systems for reporting violations carries out the preliminary examination of the formal admissibility of the report and the assessment of the validity of the circumstances represented, initiates the actions to ascertain the facts alleged in the report and makes the required communications to the Whistleblower. If the assessment reveals elements of validity, the communications envisaged by the Whistleblowing Regulation are activated, as are the interventions (with the methods envisaged by the specific company regulations) to modify the processes and control systems where necessary to avoid the repetition of situations similar to the one subject to reporting (prevention) or to mitigate their impact, and any disciplinary actions are also taken.

The Corporate Bodies are informed of the reports of particularly serious violations received and/or in the event that there is an express request by the whistleblower, subject to assessment of the validity of the report itself by the Head of the internal systems for reporting violations. The Corporate Bodies also receive and approve the annual report on the correct functioning of the internal systems for reporting violations and adopt any initiatives within their competence pursuant to the provisions of the Regulation on disciplinary offences.

The Supervisory Body takes action, following the communication of the Head of the internal reporting systems of facts/behaviours that may involve the responsibility of the Company pursuant to Legislative Decree 231/01, to integrate the preventive control measures within the Organisational Model pursuant to Legislative Decree 231/01.



The Group Regulation on internal reporting of violations (Whistleblowing) defines principles, methods and controls functional to the correct management of reports, in compliance with the confidentiality of the parties involved, for whose protection mechanisms have been set up with methods of reporting information in anonymous form.

In fact, Legislative Decree 24/2023 provides for a special protection system that is recognized not only if the reporting, accusation and public disclosure takes place during an employment relationship or other type of legal relationship, but also when the legal relationship has not yet begun, for example in the pre-contractual or selection phases, and during the probationary period, or after the dissolution of the legal relationship, provided that the information on the violations has been acquired during the aforementioned relationships, with a clear expansion of the "number of subjects that can qualify as whistleblower".

To this end, the Group has adopted measures aimed at protecting the identity of the reporting person and any other information from which it can be inferred, directly or indirectly; these identities may not be disclosed to persons other than those competent to receive or follow up on reports without the express consent of the same reporting person.

The identity of the persons involved (reported) and of the persons mentioned in the report is also protected, until the conclusion of the procedure.

The protection measures also apply to other parties that may be involved:

- facilitators (natural persons who assist the whistleblower in the reporting process, operating within the same working context and whose assistance must be kept confidential);
- persons in the same working context as the reporting person, the person who filed a complaint with the judicial or accounting authority or who made a public disclosure and who are linked to them by a stable emotional bond or are related, up to the fourth degree of kinship;
- the work colleagues of the reporting person or the person who has filed a complaint with the judicial or accounting authority or who made a public disclosure, who work in the same working context as the same and who have a habitual and current relationship with that person;
- entities owned by the reporting person or for which the same persons work, as well as entities that operate in the same working context as the aforementioned persons.

The Whistleblower and the parties possibly involved may not be subject to retaliatory, discriminatory or in any case unfair conduct, even if only attempted or threatened, resulting from the report itself (for example: dismissal, demotion, mobbing, etc.).

The Group has also provided for a specific disclosure aimed at all parties that deal with the companies in the event that they are entitled to report any directly or indirectly involved corporate offences. The purpose of the disclosure is to inform



potential whistleblowers in a clear and concise manner about the reporting channel that has been made available, its operating mechanism, procedural process, about the feedback topics and about compliance with the relevant legal provisions. The disclosure is made available to potential interested parties through the following channels:

- publication on the company website so as to be made available to external parties, contract workers and Company Employees;
- posting on company notice boards of all operating offices and at the registered office.

In addition, Banca di Asti has provided a specific training module "Whistleblowing: from Legislative Decree 24/2023 to the application of the ANAC Guidelines in Banca di Asti" which was made available to all Employees and communicated through a notice on the home page of the company Intranet in September 2024. As at 31 December 2024, the course had been completed by 371 Employees. This course pursues the following objectives:

- provide detailed knowledge of national and European legislation concerning the management of whistleblowing reports;
- share the organisational processes adopted by Banca di Asti for the efficient management of whistleblowing reports;
- share some practical examples useful for raising awareness among personnel, as well as understanding the benefits of the reporting channel in companies.

Pitagora and We Finance, in addition to having carried out a training activity by e-mail on 5 June 2023 and 12 February 2024 respectively, provided new hires with a specific e-learning training session, which had been completed by 34 Employees as at 31 December 2024.

Although the Group does not have specific policies to combat corruption or bribery consistent with the United Nations Convention Against Corruption of 2003, it envisages various measures against unlawful conduct, specifically detailed in section G1-3. For this reason, at present, the Group does not intend to draw up an ad-hoc Policy for anti-corruption issues, as it has already been extensively discussed in the Code of Ethics and the 231 Model.

In addition to the procedures for following up on whistleblowers' reports in compliance with the applicable legislation implementing Directive (EU) 2019/1937, the Group has set up procedures to rapidly, independently and objectively investigate incidents concerning the conduct of the company, including cases of corruption and bribery. As part of the General Part of the Organisational Model pursuant to Legislative Decree 231/2001, the following powers are attributed to the Supervisory Body (SB):

- freely access, without any advance consent, any information, documentation and/or data deemed necessary for the performance of the tasks envisaged by Legislative Decree 231/2001, at any Organisational Unit of the Bank, without



prejudice to the restriction of confidentiality and compliance with privacy regulations;

- promote the activation of any disciplinary proceedings and propose any sanctions envisaged by the company disciplinary system.

Given the heterogeneity of the offences from which the administrative liability of the Group may arise as well as the nature of the activities at risk of crime identified, the SB may use external consultants with proven professionalism and in possession of specific technical skills in cases where this contribution is deemed necessary and within the limits of the allocated spending budget.

To raise awareness among its Employees, the Group has adopted a specific training policy regarding business conduct.

Training management is detailed in the document *"Regulatory and Operational Provisions on training and information"* available to all Employees on the company Intranet, together with the 2022-2024 Three-Year Training Plan. Each update made to the aforementioned documents is communicated to personnel through a specific Circular Letter.

The challenges imposed by the market, the level of complexity and professionalism needed in the work environment and their continuing evolution, result in a widespread awareness of the central nature and importance of human capital.

In this context, the Cassa di Risparmio di Asti Group has developed an integrated system consisting of strategies, guidelines and tools for the management of human resources that covers the entire professional cycle of personnel, starting from the search and onboarding phase up to the development phase.

In this area, training is an aspect of the highest significance in enhancing individual skills and for steering company culture in line with the Group's tactical and strategic objectives.

In order to ensure the continuous updating of personnel, the following courses are included in the mandatory training pursuant to the current legislation on corporate culture:

- Anti-money laundering and reporting of suspicious transactions;
- GDPR – General Data Protection Regulation;
- Banking and insurance transparency;
- Security Awareness;
- Whistleblowing and Legislative Decree 231;
- Operational and reputational risk monitoring;
- Values and social responsibility (NFS);
- Data protection.

To protect the Group's activities, the internal functions most at risk of corruption and bribery have been identified.

In the mapping of the risks of crime present in the Organisational Model pursuant to Legislative Decree 231/2001 – Special Part, the company functions and processes


**SUSTAINABILITY
STATEMENT**
**GOVERNANCE
INFORMATION**

that may be exposed to situations of corruption and bribery are identified in order to analyse the various sensitive activities and find the critical points where the risk of offences being committed is greater. The table below shows the Functions at risk of corruption or bribery that have been identified by Banca di Asti.

FUNCTIONS	Credit	Purchasing management	Management of resources, infrastructure and general services	Human resources	Collections and payments	External relations	Legal and tax support and consulting	Finance
Board of Directors	X	X	X	X	X	X	X	
General Management	X	X	X	X	X	X	X	X
Credit Department	X							
Non-performing Loan Department	X						X	
Sales Department	X				X			
Resources Department		X	X	X			X	
Spending Managers		X	X					
Budget and Planning Service (Budget Office)			X				X	
Operational Department (Institutions Treasury Office)					X			
Territorial Network	X				X	X	X	X
Direct Channels and Communication Service						X		
Legal and Corporate Affairs Service						X	X	
Compliance Service							X	
Finance Department								X
Anyone who effectively carries out managerial functions	X		X	X	X	X		X
Delegated parties (not included above)	X							

The Functions at risk identified by Pitagora and We Finance are shown below:

- Board of Directors;
- Chief Executive Officer;



GOVERNANCE
INFORMATION

SUSTAINABILITY
STATEMENT

- Administration and Budget Service;
- Legal and Corporate Affairs Service;
- Operational Management;
- Credit Service;
- Human Resources Office;
- Market Service;
- Image and Institutional Communications Office.

Lastly, it should be noted that Banca di Asti, Immobiliare Maristella, Pitagora and We Finance are subject to legal obligations pursuant to national legislation (Legislative Decree no. 24 of 10 March 2023), which transposes Directive (EU) 2019/1937.

**G1-3 – Prevention and
detection of
corruption and bribery**

The procedures aimed at preventing, identifying and managing cases of corruption and bribery are governed by the Organisational Model pursuant to Legislative Decree 231/2001 – Special Part and are made known to the recipients through publication on the company Intranet. The Group's activities are oriented towards the prevention, monitoring and mitigation of the risk of corruption, through the structuring of organisational safeguards and controls aimed at intercepting situations in which crimes or other violations attributable to its Employees, Collaborators or Directors could occur, or circumstances in which such conduct may be carried out by external Stakeholders through the use of the banking and financial instruments or channels made available to them.

The organisational safeguards are accompanied by the monitoring of regulatory developments, which consists of timely adjustments to company regulations to reflect external regulations on the fight against corruption. The effective monitoring of regulatory developments is guaranteed by the inclusion of anti-corruption in the relevant regulatory scope monitored directly and continuously by the Compliance Function which, through legal inventory and alerting services, updates the relevant regulations from time to time that are applicable to the reporting of disciplinary changes to the competent organisational units. In order to make the fight against corruption as effective as possible, a system of provisions and operating procedures was adopted to monitor the execution of transactions carried out for the benefit or in the interest of the Companies belonging to the Group.

The reference regulatory framework focuses on the general principle of organisation – formalized in the Code of Ethics and Conduct – by virtue of which anyone carrying out operations and transactions involving sums of money, goods or other economically valuable benefits has the obligation to act solely on bases legitimized by the system of rules that regulate the functioning of the company organisation, or on the basis of specific authorizations, and to provide – upon request – all evidence for the verification of their work. One of the main purposes attributable to the formalization of this principle is to prevent that financial resources or company assets are directed towards unlawful purposes, including those of a corrupt nature. For the prevention of potential risks of corruption (risk of corruption in relations with the Public Administration, including Supervisory Authorities and Social



Security Institutions, risks of corruption between private parties in the activity of granting loans or in the selection of Suppliers, to mention the main ones), from a purely regulatory point of view, the controls contained in the "Regulatory and Operational Provisions on the granting and management of credit" and in the "Regulation of delegated spending powers" take on particular importance. The measures that address the risk of corruption certainly include the structuring of prevention and control activities in the area of anti-money laundering, in the awareness that corruption is one of the most significant threats among the crimes that generate income to be laundered. In turn, anti-money laundering activities represent a tool to combat corruption to the extent that, by hindering the reuse of proceeds deriving from illegal activities, it tends to make corruption less advantageous.

The Parent Company discloses its Model to the Group Companies, as a guideline for the development of the respective organisational models, in order to prevent them from carrying out unlawful conduct pursuant to Legislative Decree 231/2001.

In fact, Pitagora, We Finance and Immobiliare Maristella have their own Organisation, management and control model compliant with Legislative Decree 231/2001. At the time of drafting this document, the updating of the Model of Pitagora is underway. Subsequently, the Model adopted by We Finance will be reviewed.

As part of the prevention and identification of corruption and bribery, the Group has established its own Supervisory Body (SB), assigning the related functions to the Board of Statutory Auditors by specific decision of the Board of Directors.

The Board of Statutory Auditors is a Body with autonomous powers of initiative and control, as well as the "continuity of action" required by Legislative Decree 231/2001 for the performance of the supervisory function on the Organisational and Management Model.

Furthermore, as part of the reports which are periodically transmitted to the SB on compliance with the general and specific protocols relating to the relevant risk areas, including those concerning corporate offences/management of public funds related to loans granted to Customers, the offices/management/services report any critical issue that may have occurred, undertaking, under their own responsibility, to promptly report further relevant critical issues.

By the date of approval of the draft financial statements, the SB reports to the Board of Directors on the enforcement of the Model, with particular reference to the results of the supervisory activities carried out during the previous period and any actions identified for implementation of the Model. In addition, the SB submits the "Operational plan of activities" prepared for the following year to the Board of Directors for approval. In 2024, the Supervisory Body presented its Report at the meeting of the Board of Directors on 28 March.

The Group communicates its policies to those for whom they are relevant so that they are accessible and those concerned understand their implications. To this end, the



Organisation and Management Model adopted pursuant to Legislative Decree 231/2001 (including the Code of Ethics, which is an integral part of it) is published on the company Intranet with mandatory acknowledgement procedures for all Employees and Collaborators (i.e. sales network), with consequent constant monitoring of the related data. Likewise, the document can be consulted on the portal dedicated to Legislative Decree 231/2001, while the general part of the Organisational Model pursuant to Legislative Decree 231/2001 and the Code of Ethics are made public on the Parent Company's institutional website, to which reference should be made for further details.

The Group Companies have also envisaged, in line with Legislative Decree 24/2023, the exposure of the Whistleblowing disclosure in the transparency bulletin board of the operating offices (branches) and in a specific section in the institutional websites where the updated information on the channel, the procedures and the prerequisites necessary to make internal and external reports are published, the relative documentation for sending the report, as well as the dedicated link for transmission via the "Comunica Whistleblowing" platform of the supplier Unione Fiduciaria. For more details in this regard, please refer to the institutional websites of the Group Companies.

The Group Regulation on internal reporting of violations (Whistleblowing) is published on the company Intranet and can be viewed by Group Employees.

To ensure the enforcement of Model 231, training and information are promoted and monitored by the Board of Statutory Auditors, which acts as a Supervisory Body pursuant to Legislative Decree 231/2001, through methods that ensure widespread dissemination. The Group's objective is to ensure that all parties involved, including members of the Corporate Bodies, Central Management, Top Management, company personnel, financial advisors qualified for off-site work, interns, contract workers and, in general, anyone who acts as an assignee and/or attorney of Banca di Asti and the Group Companies, have an in-depth knowledge of the Decree, the Model and the related obligations.

New hires of Group Companies are required to attend a specific mandatory training course on Model 231/2001 and Whistleblowing regulations. Banca di Asti has also made available to all its Employees, on the Lyve online platform, the mandatory training course "Legislative Decree 231 and Whistleblowing", which deals with the guiding principles, key articles and impacts of this legislation.

All Employees of the Group's functions at risk are required to take these training courses.

Specialist training in the field of corruption and bribery is also provided to members of the administrative, management and supervisory bodies.

In the Regulations on the composition and self-assessment of the Board of Directors and the Board of Statutory Auditors, it is envisaged that Banca di Asti carries out the preparation and training of the Representatives, including through collaboration with specialized bodies (i.e. Universities and trade associations), envisaging at least



**SUSTAINABILITY
STATEMENT**

**GOVERNANCE
INFORMATION**

two sessions per year or more relating to the subjects indicated in the Regulations themselves, which also include "anti-corruption policies and procedures and offences under Legislative Decree 231/2001".

The training plan of the Board of Directors, planned on the basis of its (three-year) mandate, will continue until April 2027. On 26 October 2023, the topic "Directors' Responsibilities and Legislative Decree 231/2001" was discussed. For further details on the training programme for administrative, management and supervisory bodies, please refer to section ESRS 2 GOV1.

The training plan currently in force for the Board of Statutory Auditors will end in April 2025, the expiration of the current mandate.

Metrics and targets

To complete the above, it should be noted that in 2024 no convictions were imposed for violations of the laws against corruption and bribery, nor were actions taken against violations of the procedures and regulations to combat corruption and bribery.

Likewise, no cases of corruption or bribery have been ascertained, nor cases in which own workers have been dismissed or sanctioned for episodes of corruption or bribery, or cases relating to contracts with commercial partners that have been terminated or not renewed due to violations related to corruption or bribery. Lastly, it is noted that during 2024 no public legal proceedings were initiated regarding corruption or bribery against the Group and its employees during the reference period.

Although no remedial actions were necessary, the model is subject to regular updates and reviews in order to ensure not only compliance with current regulations, but also effective risk management and a high standard of ethics and corporate responsibility.

In line with its strategic policies, the Group defines specific targets aimed at reducing negative impacts, strengthening positive ones, and managing material risks and opportunities in the area of business conduct.

The Stakeholder engagement process consists of a continuous dialogue with individuals and/or groups influenced by company activities, with the aim of collecting their expectations and concerns, integrating them into the company strategies, and building transparent and collaborative relationships. To this end, the Group conducted an exploratory online survey, involving Shareholders, Customers, Employees, Top Management and Suppliers for the preparation of the Double Materiality analysis.

The results obtained were also taken into consideration in the definition of the strategic objectives of the 2025-2027 Sustainability Plan, so that they expressed consistency both with the preferences expressed by the Stakeholders and with the strategic directives of the company.

G1-4 – Confirmed incidents of corruption or bribery

MDR-A - MDR-T – Actions and targets relating to business conduct



GOVERNANCE
INFORMATION

SUSTAINABILITY
STATEMENT

The constant monitoring of the pre-established objectives is a fundamental activity to ensure their full achievement within the established times and to make any remedial actions. For more details on the Sustainability Plan, please refer to section ESRS 2 GOV-1.

Below are the targets defined in relation to the conduct of companies, in accordance with the provisions of the 2025-2027 Sustainability Plan.

These targets are aligned with the principles and values expressed in the Group Sustainability Policies and in the Code of Ethics, in order to promote the enhancement of human resources, social responsibility and sustainability, with particular attention to inclusiveness and ethical management of company resources.

ESRS – Sub-topic	Target	Final target	Base year	Final target year	Actions	Perimeter
G1 – Business conduct <i>Corporate culture</i>	Definition of a training programme aimed at increasing the ESG skills of the members of the Board of Directors in order to consolidate adequate awareness of the subject	Provision of specific ESG training sessions for members of the Board of Directors	Base year: 31/12/24	2027	Assessment of training needs, definition and provision of induction sessions	Group
G1 – Business conduct <i>Corporate culture</i>	Empowerment of Management on the actual achievement of ESG targets	Identification of ESG targets to be assigned to the main Risk Takers, whose achievement will be linked to variable remuneration	Base year: 31/12/24	2027	Identification of the ESG targets to be monitored and on which to calculate a part of the variable component of remuneration	Group
G1 – Business conduct <i>Protection of whistleblowers</i>	Safeguarding and protecting those who report and bring to light violations, abuses and crimes	Conducting online or in-person training sessions on the topic	Base year: 31/12/24	2027	Dissemination of the training proposal and monitoring of its use	Group
G1 – Business conduct <i>Corruption and bribery</i>	Monitoring of the conduct and discipline of Employees and Management	Conducting online or in-person training sessions on the topic	Base year: 31/12/24	2027	Dissemination of the training proposal and monitoring of its use	Group

To consult the 2022-2024 Sustainability Plan, with reference to the objectives and targets set for 2024, please refer to section ESRS 2.



The close and the outcome of the 2024 election campaigns in the global economy have not dissipated the uncertain outlook, which is now focused on the economic policy to be adopted by the new US administration after taking office on 20 January. It is an uncertainty shared at global level in an economy that has remained solid in the summer months, but which is preparing to face the new economic and political course in a different way among the individual countries. Those most exposed in the US market, such as Canada, have already shown that they are fully open to bilateral negotiations with the US. China, the main antagonist of the US economy, seeks to strengthen its domestic demand to mitigate the possible restrictive effects on its exports to the US and acts in advance to show that it will not passively suffer US restrictions. The confidence of households is improving, as they seem to give credit to the policy announced during the election campaign to reduce the tax burden. Manufacturing companies, however, remain relatively more uncertain, between promises of tax relief and deregulation, on the one hand, and the risk of paying higher tariffs on certain imported goods needed in production processes, on the other. As regards the fight against immigration in defence of American workers, a drastic approach focusing on the repatriation of illegal immigrants does not seem feasible, but gradual interventions on immigrants entering the US are considered more likely.

Evolution of the operating context

All of this for the US economy translates into an estimated GDP growth of 2.4% in 2025, but this is accompanied by a halt in the downward trend of inflation, which could actually remain stably above the Fed's target, with risks of additional upward pressure from the labour market and, above all, due to the higher cost of imported products subject to higher custom duties. US public sector debt is expected to exceed 130% of GDP in 2027.

For China, the increase in tariffs on products exported to the US will penalise growth already in 2025. In this context, the risk of an escalation of the commercial war between the US and China is not insignificant and will increasingly involve third parties countries even if they are not affected by the tariff increase on products exported to the USA.

Difficulties for Europe could increase. Europe dependence on some Chinese products, including strategic raw materials, is more significant than that of the US, and worsening trade relations with China could amount to deteriorating European growth prospects. An aggressive pricing policy by China could displace the already fragile domestic production situation in some sectors. While household consumption in some countries reacted positively to the decline in inflation in the third quarter of 2024, suggesting the possibility of recovery with possible positive effects also on investments in capital goods, in Germany, an economy driven by exports, the fear of a persistent fragility of demand, international and now also domestic, continues to prevail. For this reason, the ECB is expected to take a more aggressive stance in the current phase of lowering monetary policy rates and to lower the interest rate on the return on deposits to 2% by June 2025.



**SIGNIFICANT EVENTS
AFTER
YEAR END**

For the Italian market, forecasts were repeatedly revised downwards and the outlook deteriorated. Our country's excellent past performance is to a large extent due to the abundant fiscal stimulus, and especially the housing Superbonus, which are temporary and destined to produce a negative rebound once they are over. There is also a weakness in household spending, given the compression of purchasing power exerted by inflation in a situation in which wages are very slowly recovering previous losses. However, inflation has dropped considerably in Italy, more than in the rest of Europe, and this is opening up room for recovery. The national accounts for the third quarter show a rebounding in household consumption higher than expected (+1.4% on the second quarter, also revised upward), which brings the acquired growth for 2024 to 0.7%. The most recent data show worse than expected trends due to the contribution to demand provided by the National Recovery and Resilience Plan (NRRP) interventions. Although the achievement of the targets is proceeding in line with the agreed timetable, actual spending up to October would stand at € 17 billion and, even including the likely acceleration in reporting in November and December, the annual figure would close far short of the planned € 40 billion. Therefore, 2025 will start off weakly.

The tax policy is expected to be expansive with the main objectives of the budget law for 2024 related to inflation adjustments on public employees' labour contracts and healthcare costs, as well as a reduction of the tax burden on low- and middle-income earners is expected. The latter will be a temporary measure for 2024 and takes the form of a tax wedge cut for workers and a change in income tax rates and tax credits. A large part of the resources of 2024 will be absorbed by the one-year extension of the partial cut of the tax wedge (approximately € 13 billion, 0.6% of GDP). Given the transitional nature of most of these measures, based on current government plans, they will not lead to an increase in expenditure in 2025, although there is a possibility that some measures will be extended further.

Business outlook For the banking sector, and therefore also for the Bank, economic growth will be moderate, with an average annual increase of 0.6%. The demand for loans will therefore remain subdued as well, also affected by the end of the housing Superbonus and an investment cycle made even weaker by the increased uncertainty in the international political environment that emerged in the last months of the year.

Loans to households will grow, supported by the initial fall in rates, while loans to businesses, which have fallen significantly through 2025, may rise slightly again in the next two years due to lower rates and improved credit conditions.

The profitability prospects of the banking sector will be affected by the drop in net interest margin, partially offset by the increase in fee and commissions.

In February 2025, the Group has approved the new three-year 2025-2027 Strategic Plan; in the preparation of which the focus was placed on activity planning and on the sustainability assessment of the business model in light of mutating scenarios and structural changes under way in the reference market as a result of the



continuing Russian-Ukrainian conflict accentuated by the instability resulting from the Israeli-Palestinian conflict in the Middle East and the economic effects of the protectionist policies announced by the new US presidency.

The guidelines underlying the Plan can be broken down as follows:

- a) maintenance of a high level of capital strength, improving asset quality and profitable use of the liquidity generated by core operations with a view to preserving funding (by stabilising and developing direct retail and wholesale funding) in order to maintain high levels of *Liquidity Coverage Ratio* and *Net Stable Funding Ratio*;
- b) business development (personal finance, SMEs, wealth management, insurance/protection) and the full commercial potential of distribution networks;
- c) competitiveness and efficiency, with remodelling of operating processes through a more intense use of digital technology to improve efficiency and strengthen the relationship with the customer, together with cost management initiatives in order to keep the cost/income ratio at the best levels (in particular of the LSI sector).

The Group has jointly launched projects aimed at improving competitive capacity and efficiency through the following drivers:

- a) the lean and project-driven organisation, which includes among others end-to-end digital restructuring of some core processes, to eliminate low added value activities and to simplify work processes, favour the extensive use of digital technology and data processing, the enhancement of organisational/technological skills available in the company, as well as agile project management;
- b) *change management, with the direct involvement of the top and middle management* in the organisational repositioning activity, also for the purpose of evolution of the mindset, and the strengthening of the training activity consistent with the objectives of the Plan, in terms of competitiveness and efficiency;
- c) the constant monitoring of the cost base, with an active *cost management*, as well as the support of enabling investments for the implementation of strategic initiatives with constant monitoring of the cost base to rationalise expenses, streamline processes and keep the cost/income ratio at target values;
- d) IT development, with new management of the primary interface between IT and users for the aspects of innovation generated by recent technological developments, and investments in operating platforms and activities aimed at data management and operating process automation (with a focus on those deemed key to the objectives of the Plan).

The sensitivity analyses performed on the economic and financial projections and the company's capacity to effectively handle disaster recovery conditions to ensure



**SIGNIFICANT EVENTS
AFTER
YEAR END**

continuity in operating processes, have confirmed the business's capacity to continue to operate as a going concern.

The Bank's Board of Directors, considering the approval of the 2025-2027 Strategic Plan, the Bank's satisfactory level of capitalisation, and taking account of the consolidated history of profitable business and privileged access to financial resources, has the reasonable expectation that even in the current financial economic environment threatened by war scenarios from Eastern Europe and the Middle East, the Group will continue to operate in the foreseeable future. Therefore, they prepared the 2024 draft financial statements by applying the going concern assumption.

**Significant events
after the end of the
year**

For the Group, in the period after the end of the year no significant events arose that resulted in the need to make changes to the figures or information in the 2024 financial statements.

In January 2025, Banca di Asti completed the placement of a Tier 2 subordinated bond loan for institutional investors, for a nominal value of € 200 million and a 10-year maturity (23 January 2035).

The bond pays a fixed annual coupon of 7.375% until the reset date established on 23 January 2030. Starting from that date, if the issuer does not exercise the early repayment option, the coupon will be restated on the basis of the 5-year mid-swap rate increased by 507.8 basis points. The bond is in dematerialised form and centralised at Euronext Securities Milan (formerly Monte Titoli) and was admitted to listing on the unregulated Global Exchange Market of the Dublin Stock Exchange.

At the end of May 2024, the Bank of Italy initiated a general inspection at the Parent Company, pursuant to Article 54 of Italian Legislative Decree 385/1993 (Consolidated Banking Law, "TUB") and on the adequacy of organisational, governance and control structures relating to relevant issues in terms of customer protection, pursuant to the combined provisions of Articles 54 and 128 of the TUB, which was concluded in October 2024. In view of the elements acquired during the inspection, a number of actions were identified, which were confirmed in the inspection reports delivered to the Bank at the end of January 2025. In relation to the findings and observations made by the Supervisory Authority, the Bank will formulate its own considerations, also highlighting the activities already implemented and the plan of actions defined for the implementation of the observations received and the resolution of the critical issues identified. The results of the financial statements include the accounting effects of the Supervisory Authority's observations and the plan of actions decided.

**Other
information**

During 2024, the Parent Company sold treasury shares representing approximately 1.77% of the share capital to Fondazione CRT at a price per share of € 8.75 (corresponding to the "reference price" of Banca di Asti shares expressed by the market), for a total of approximately € 10.9 million and sold, in several tranches, additional treasury shares representing approximately 4.23% of the share capital,

**SIGNIFICANT EVENTS
AFTER
YEAR END**

purchased by the Bank on the market as part of an initiative providing extraordinary support to the liquidity of the security. This extraordinary initiative was carried out starting from the auction of 21 June 2024 under terms and conditions that guarantee equal treatment and the protection of the interests of the Bank's shareholders customers, without prejudice to the necessary authorisations from the Shareholders' Meeting of Banca di Asti for the purchase and disposal of treasury shares and from the Bank of Italy for the renewal of the ceiling reserved for the buyback of Common Equity Tier 1 instruments.

The entire operation was aimed at supporting the long-term strategic and industrial development of the Bank as one of the main proximity banks for Piedmont and the North of the country.

SIGNIFICANT EVENTS
AFTER
YEAR END





GRUPPO CASSA DI
RISPARMIO DI ASTI

**CONSOLIDATED
BALANCE
SHEET**



**CONSOLIDATED
BALANCE
SHEET**

CONSOLIDATED BALANCE SHEET			
Assets		31/12/2024	31/12/2023
10.	Cash and cash equivalents	896,745	646,993
20.	Financial assets measured at fair value through profit or loss	141,824	108,501
	a) financial assets held for trading	88,344	38,482
	c) other financial assets mandatorily measured at fair value	53,480	70,019
30.	Financial assets measured at fair value through other comprehensive income	1,163,243	1,050,666
40.	Financial assets measured at amortised cost	9,547,145	9,593,127
	a) Loans and advances to banks	148,800	192,292
	b) Loans and advances to customers	9,398,345	9,400,835
50.	Hedging derivatives	2	18,312
70.	Equity investments	234	195
90.	Property, plant and equipment	204,252	208,535
100.	Intangible assets	82,027	83,757
	of which:		
	- goodwill	66,269	66,269
110.	Tax assets	180,553	219,833
	a) current	38,260	38,636
	b) deferred	142,293	181,197
120.	Non-current assets held for sale and discontinued operations	2,375	2,375
130.	Other assets	793,824	781,781
	Total assets	13,012,224	12,714,075



CONSOLIDATED
BALANCE
SHEET

CONSOLIDATED BALANCE SHEET			
Liabilities and Shareholders' equity		31/12/2024	31/12/2023
10.	Financial liabilities measured at amortised cost	11,372,645	11,150,840
	a) Deposits from banks	710,930	765,196
	b) Deposits from customers	9,643,820	9,209,382
	c) Debt securities in issue	1,017,895	1,176,262
20.	Financial liabilities held for trading	1,936	1,974
30.	Financial liabilities designated at fair value	12,496	12,768
40.	Hedging derivatives	79,531	112,954
60.	Tax liabilities	261	121
	a) current	261	121
80.	Other liabilities	342,990	273,117
90.	Provision for employee severance pay	13,692	13,656
100.	Provisions for risks and charges	39,082	32,438
	a) commitments and guarantees given	8,216	4,972
	c) other provisions for risks and charges	30,866	27,466
120.	Valuation reserves	(31,047)	(37,562)
140.	Equity instruments	97,567	97,567
150.	Reserves	307,807	261,065
160.	Share premium reserve	336,135	339,370
170.	Share capital	363,971	363,971
180.	Treasury shares (-)	(3,031)	(13,137)
190.	Minority shareholders' equity (+/-)	30,487	24,540
200.	Profit (Loss) for the year (+/-)	47,702	80,393
	Total liabilities and shareholders' equity	13,012,224	12,714,075





GRUPPO CASSA DI
RISPARMIO DI ASTI

**CONSOLIDATED
INCOME
STATEMENT**





CONSOLIDATED INCOME STATEMENT			
Items		31/12/2024	31/12/2023
10. Interest income and similar revenues		524,463	503,978
of which: interest income calculated using the effective interest rate method		460,400	426,804
20. Interest expense and similar charges		(227,356)	(232,352)
30. Net interest margin		297,107	271,626
40. Fee and commission income		179,722	177,954
50. Fee and commission expense		(106,090)	(78,885)
60. Net fees and commissions		73,632	99,069
70. Dividends and similar income		10,387	10,335
80. Net profit (loss) from trading		90,922	71,356
90. Net profit (loss) from hedging		1,256	1,652
100. Gains (losses) on disposal or repurchase of:		(4,566)	(39,501)
a) financial assets measured at amortised cost		(18,159)	(41,229)
b) financial assets measured at fair value through other comprehensive income		14,742	491
c) financial liabilities		(1,149)	1,237
110. Net profit (loss) from other financial assets and liabilities measured at fair value through profit or loss		137	(8,978)
a) financial assets and liabilities designated at fair value		109	123
b) other financial assets mandatorily measured at fair value		28	(9,101)
120. Net banking income		468,875	405,559
130. Net adjustments to/recoveries on credit risk relating to:		(96,849)	(64,189)
a) financial assets measured at amortised cost		(96,938)	(66,278)
b) financial assets measured at fair value through other comprehensive income		89	2,089
140. Profits/losses from contractual changes without derecognition		215	(309)
150. Net income from financial activities		372,241	341,061
180. Net income from financial and insurance activities		372,241	341,061
190. Administrative expenses:		(284,569)	(279,157)
a) personnel expenses		(149,846)	(142,980)
b) other administrative expenses		(134,723)	(136,177)
200. Net allocations to provisions for risks and charges		(21,859)	(6,613)
a) commitments and guarantees given		(3,245)	272
b) other net provisions		(18,614)	(6,885)
210. Net adjustments to/recoveries on property, plant and equipment		(16,886)	(15,863)
220. Net adjustments to/recoveries on intangible assets		(7,493)	(7,445)
230. Other operating expenses/income		36,881	67,840
240. Operating costs		(293,926)	(241,238)
280. Gains (losses) on disposal of investments		(270)	57
290. Profit (loss) before tax from continuing operations		78,045	99,880
300. Tax expenses (income) for the year from continuing operations		(26,816)	(20,841)
310. Profit (loss) after tax from continuing operations		51,229	79,039
330. Profit (loss) for the year		51,229	79,039
340. Minority profit (loss) for the year		3,527	(1,354)
350. Parent company's profit (loss) for the year		47,702	80,393





GRUPPO CASSA DI
RISPARMIO DI ASTI

**STATEMENT
OF CONSOLIDATED
COMPREHENSIVE
INCOME**



STATEMENT OF
CONSOLIDATED
COMPREHENSIVE
INCOME

STATEMENT OF CONSOLIDATED COMPREHENSIVE INCOME			
Item	ITEMS	31/12/2024	31/12/2023
10.	Profit (loss) for the year	51,229	79,039
	Other comprehensive income after tax not reclassified to profit or loss		
20.	Equity securities designated at fair value through other comprehensive income	98	24
30.	Financial liabilities designated at fair value through profit or loss (own creditworthiness changes)	(52)	(62)
70.	Defined benefit plans	2	(285)
	Other comprehensive income after tax reclassified to profit or loss		
130.	Cash flow hedging	493	(494)
150.	Financial assets (other than equity securities) measured at fair value through other comprehensive income	5,860	23,312
200.	Total other income after tax	6,401	22,495
210.	Other comprehensive income (Item 10+200)	57,630	101,534
220.	Minority consolidated other comprehensive income	3,365	(1,598)
230.	Parent Company's consolidated other comprehensive income	54,265	103,132



GRUPPO CASSA DI
RISPARMIO DI ASTI

**STATEMENT
OF CHANGES
IN CONSOLIDATED
SHAREHOLDERS' EQUITY**

STATEMENT OF CHANGES
IN CONSOLIDATED
SHAREHOLDERS' EQUITY

STATEMENT OF CHANGES IN SHAREHOLDERS' EQUITY	Balance as at 31/12/2023	Changes in opening balances	Balance as at 01.01.2024	Previous year profit (loss) allocation		Changes during the year									Group shareholders' equity at 31.12.2024	Minority shareholders' equity as at 31.12.2024
						Changes in reserves	Shareholders' equity transactions							Other comprehensive income for 2024		
				Reserves	Dividends and other allocations		Issue of new shares	Purchase of treasury shares	Extraordinary dividend distribution	Changes in equity instruments	Treasury shares derivatives	Stock options	Changes in equity interests			
SHARE CAPITAL																
- ordinary shares	381,521		381,521	0			0	0					2,515		363,971	20,065
- other shares	0,000		0,000	0			0	0					0		0	0
SHARE PREMIUM RESERVE	339,370	0	339,370	0		0	-3,235						0		336,135	0
RESERVES																
- profit	140,334	0	140,334	56,469		0	0	0	0				0		190,050	6,753
- other	128,819	0	128,819	0		-3,546	0		0		0	0	-7,516		117,757	0
VALUATION RESERVES	-37,306	0	-37,306			0							0	6,401	-31,047	142
EQUITY INSTRUMENTS	97,567		97,567							0			0		97,567	0
TREASURY SHARES	-13,137		-13,137			0	40,267	-30,161							-3,031	0
PROFIT (LOSS) FOR THE YEAR	79,039	0	79,039	-56,469	-22,570								0	51,229	47,702	3,527
GROUP SHAREHOLDERS' EQUITY	1,091,667	0	1,091,667	0	-21,161	-10,024	37,032	-30,161	0	0	0	0	-2,514	54,265	1,119,104	X
MINORITY SHAREHOLDERS' EQUITY	24,540	0	24,540	0	-1,409	6,478	0	0	0	0	0	0	-2,487	3,365	X	30,487





STATEMENT OF CHANGES
IN CONSOLIDATED
SHAREHOLDERS' EQUITY

STATEMENT OF CHANGES IN SHAREHOLDERS' EQUITY	Balance as at 31.12.2022	Changes in opening balances	Balance as at 01.01.2023	Previous year profit (loss) allocation		Changes during the year									Group shareholders' equity as at 31.12.2023	Minority shareholders' equity as at 31.12.2023
						Changes in reserves	Shareholders' equity transactions							Other comprehensive income for 2023		
				Reserves	Dividends and other allocations		Issue of new shares	Purchase of treasury shares	Extraordinary dividend distribution	Changes in equity instruments	Treasury shares derivatives	Stock options	Changes in equity interests			
SHARE CAPITAL																
- ordinary shares	380,768		380,768	0			0	0					753		363,971	17,550
- other shares	0		0	0			0	0					0		0	0
SHARE PREMIUM RESERVE	339,370	0	339,370	0		0	0						0		339,370	0
RESERVES																
- profit	118,216	0	118,216	21,381		0	0	0	0				737		132,245	8,088
- other	137,061	0	137,061	0		-8,242	0		0			0	0		128,819	0
VALUATION RESERVES	-59,801	0	-59,801			0							0	22,495	-37,562	256
EQUITY INSTRUMENTS	97,567		97,567							0			0		97,567	0
TREASURY SHARES	-11,955		-11,955			0	0	-1,182							-13,137	0
PROFIT (LOSS) FOR THE YEAR	36,193	0	36,193	-21,381	-14,812									79,039	80,393	-1,354
GROUP SHAREHOLDERS' EQUITY	1,011,145	0	1,011,145	0	-14,107	-8,041	0	-1,182	0	0	0	0	720	103,132	1,091,667	X
MINORITY SHAREHOLDERS' EQUITY	26,274	0	26,274	0	-705	-200	0	0	0	0	0	0	770	-1,598	X	24,540





GRUPPO CASSA DI
RISPARMIO DI ASTI

CONSOLIDATED STATEMENT OF CASH FLOWS





CONSOLIDATED
CASH FLOW
STATEMENT

CONSOLIDATED STATEMENT OF CASH FLOWS Indirect Method	AMOUNT	
	31/12/2024	31/12/2023
A. OPERATING ACTIVITIES		
1. Cash flows from operations	333,361	427,993
- profit (loss) for the year (+/-)	51,229	79,039
- capital gains/losses on financial assets held for trading and on other financial assets/liabilities measured at fair value through profit or loss (-/+)	(26,710)	(11,063)
- capital gains/losses on hedging activities (-/+)	(71,325)	(27,156)
- net adjustments to/recoveries on credit risk (+/-)	144,563	181,804
- net adjustments to/recoveries on property, plant and equipment and intangible assets (+/-)	25,855	21,717
- net allocations to provisions for risks and charges and other expenses/income (+/-)	21,828	(26,365)
- net revenues and net costs of insurance contracts issued and outwards reinsurance (-/+)	0	0
- unpaid duties, taxes and tax credits (+/-)	24,675	12,794
- net adjustments to/recoveries on discontinued operations after tax (+/-)	0	0
- other adjustments (+/-)	163,246	197,223
2. Liquidity generated/absorbed by financial assets	443,996	1,533,465
- financial assets held for trading	(17,114)	(1,382)
- financial assets designated at fair value	0	0
- other assets mandatorily measured at fair value	18,226	7,175
- financial assets measured at fair value through other comprehensive income	444,213	781,339
- financial assets measured at amortised cost	(115,925)	536,387
- other assets	114,596	209,946
3. Liquidity generated/absorbed by financial liabilities	(492,035)	(2,897,701)
- financial liabilities measured at amortised cost	173,219	(2,143,347)
- financial liabilities held for trading	(1,921)	(1,974)
- financial liabilities designated at fair value	(241)	(26,968)
- other liabilities	(663,092)	(725,412)
4. Liquidity generated/absorbed by insurance contracts issued and outwards reinsurance	0	0
- insurance contracts issued that are liabilities/assets (+/-)	0	0
- outwards reinsurance that are assets/liabilities (+/-)	0	0
Net liquidity generated/absorbed by operating activities	285,322	(936,243)
B. INVESTMENT ACTIVITIES		
1. Cash flows from	0	266
- sales of equity investments	0	210
- dividends collected on equity investments	0	0
- sales of property, plant and equipment	0	56
- sales of intangible assets	0	0
- sales of business branches	0	0
2. Cash flows used in	(19,871)	(17,477)
- purchases of equity investments	0	(1,570)
- purchases of property, plant and equipment	(14,107)	(11,852)
- purchases of intangible assets	(5,764)	(4,055)
- purchases of business branches	0	0
Net liquidity generated/absorbed by investment activities	(19,871)	(17,211)
C. FUNDING ACTIVITIES		
- issue/purchase of treasury shares	6,871	318
- issue/purchase of equity instruments	0	0
- dividend distribution and other purposes	(22,570)	(14,812)
Net liquidity generated/absorbed by funding activities	(15,699)	(14,494)
NET LIQUIDITY GENERATED/ABSORBED IN THE YEAR	249,752	(967,948)

RECONCILIATION Item	AMOUNT	
	31/12/2024	31/12/2023
Cash and cash equivalents at the beginning of the year	646,993	1,614,941
Total net liquidity generated/absorbed in the year	249,752	(967,948)
Cash and cash equivalents: effect of exchange rate changes	0	0
Cash and cash equivalents at the end of the year	896,745	646,993





GRUPPO CASSA DI
RISPARMIO DI ASTI

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

Section 1. Statement of compliance with the international accounting standards Pursuant to IAS 1 § 16, it is hereby certified that the consolidated financial statements as at 31 December 2024 comply with all the IAS/IFRS international accounting standards applicable, as endorsed by the European Commission and in force as at 31 December 2024, based on the procedure set out in Regulation (EC) 1606/2002, including the SIC/IFRIC interpretations.

The consolidated financial statements as at 31 December 2024 were prepared in accordance with IAS/IFRS international accounting standards, as described above, in addition to referencing that established by the Bank of Italy in Circular 262 of 22 December 2005, which regulates bank financial statements, revised by its eighth update of November 2022.

Section 2. General preparation criteria The consolidated financial statements were drawn up by applying the fundamental principles set out in the reference accounting standards. In particular:

- the accruals principle: the effect of events and operations is recorded when they occur and not when the related collections or payments arise;
- the going concern principle: the consolidated financial statements were drawn up under the assumption that the Group will be a going concern for a time period of at least 12 months from the date of their approval.

In recognising operating events in the accounting records, the principle of the priority of economic substance over form was applied.

In order to best guide the interpretation and application of the IAS/IFRSs, the following documents were also referred to:

- Framework for the Preparation and Presentation of Financial Statements of the International Accounting Standards Board (IASB);
- Implementation Guidance, Basis for Conclusions, and possible other documents drawn up by the IASB or IFRIC (*International Financial Reporting Interpretations Committee*) to supplement the accounting standards issued;
- The interpretation documents on the application of IAS/IFRS in Italy prepared by the Italian Accounting Body (OIC) and the Italian Banking Association (ABI);
- The documents and recommendations issued by the European Authorities and referred to by the Bank of Italy and Consob concerning the application of specific provisions in the IFRS standards;
- The joint Bank of Italy/Consob/Ivass Document 9 published in January 2021 regarding the "Tax treatment of tax credits associated with the 'Cura Italia' and 'Rilancio' Italian Law Decrees, acquired as a result of disposal by the direct beneficiaries or previous acquirers".

New international accounting standards in force from 1 January 2024.

As required by IAS 8, the new international accounting standards or amendments to standards already in force are shown below, with their related endorsement regulations, whose application became mandatory on 1 January 2024.



A.1 – GENERAL PART

- On 23 January 2020, the IASB published an amendment called "*Amendments to IAS 1 Presentation of Financial Statements: Classification of Liabilities as Current or Non-current*" and on 31 October 2022 published an amendment called "*Amendments to IAS 1 Presentation of Financial Statements: Non-Current Liabilities with Covenants*". The documents aim to clarify how to classify payables and other current or non-current liabilities. The amendments take effect from 1 January 2024.
- On 22 September 2022, the IASB published an amendment called "*Amendments to IFRS 16 Leases: Lease Liability in a Sale and Leaseback*". The document requires the seller-lessee to assess the liability for the lease deriving from a sale & leaseback transaction so as not to recognise an income or a loss that refers to the right of use withheld. The amendments apply from 1 January 2024.
- On 25 May 2023, the IASB published an amendment called "*Amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures: Supplier Finance Arrangements*". The document requires an entity to provide additional information on reverse factoring agreements that allow users of the Consolidated Accounting Statements to assess how financial agreements with suppliers may affect the entity's liabilities and cash flows as well as to understand the effect of such agreements on the entity's exposure to liquidity risk. The amendments apply from 1 January 2024.

The new amendments applicable from 2024 had no impact on the consolidated financial statements as at 31 December 2024.

IFRS accounting standards, amendments and interpretations not yet endorsed, or already endorsed but not mandatorily applicable or not adopted early by the Group.

At the reference date of these consolidated financial statements, the competent bodies of the European Union have not yet completed the endorsement process necessary for the adoption of the amendments and standards described below.

- On 30 May 2024, the IASB published the document "*Amendments to the Classification and Measurement of Financial Instruments - Amendments to IFRS 9 and IFRS 7*". The document clarifies some problematic aspects that emerged from the post-implementation review of IFRS 9, including the accounting treatment of financial assets whose returns vary upon achievement of ESG objectives (i.e. green bonds). In particular, the amendments aim to:
 - clarify the classification of financial assets with variable returns and linked to environmental, social and corporate governance (ESG) objectives and the criteria to be used for the assessment of the SPPI test;
 - determine that the date of settlement of the liabilities through electronic payment systems is that on which the liability is



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

extinguished. However, an entity is permitted to adopt an accounting policy to allow for the elimination of a financial liability before delivering liquidity on the settlement date in the presence of certain specific conditions.

With these amendments, the IASB has also introduced additional reporting requirements with regard, in particular, to investments in equity instruments designated at FVOCI.

The amendments will apply from the financial statements for years beginning on or after 1 January 2026.

- On 9 May 2024, the IASB published a new standard IFRS 19 *Subsidiaries without Public Accountability: Disclosures*. The new standard introduces some simplifications with reference to the reporting required by the other IAS-IFRS standards. This standard can be applied by an entity that meets the following main criteria:

- is a subsidiary;
- has not issued equity or debt instruments listed on a market and is not about to issue them;
- has its own parent company that prepares the Consolidated Accounting Statements in compliance with IFRS.

The new standard will enter into force on 1 January 2027.

- On 9 April 2024, the IASB published a new standard IFRS 18 *Presentation and Disclosure in Financial Statements* which will replace IAS 1 *Presentation of Financial Statements*. The new standard aims to improve the presentation of the main financial statements and introduces important changes with reference to the income statement. In particular, the new standard requires:

- revenues and costs to be classified into three new categories (operating, investment and financial sections), in addition to the taxes and discontinued operations categories already present in the income statement;
- two new sub-totals to be presented, the operating result and the result before interest and taxes (i.e. EBIT).

The new standard also:

- requires more information on performance indicators defined by management;
- introduces new criteria for the aggregation and disaggregation of information;
- introduces some changes to the cash flow statement, including the request to use the operating result as a starting point for the presentation of the cash flow statement prepared with the indirect method and the derecognition of some options for the classification of some currently existing items (such as for example interest paid, interest collected, dividend income paid and dividend income collected).



A.1 – GENERAL PART

The new standard will enter into force from 1 January 2027, but early application is permitted.

- On 15 August 2023, the IASB published an amendment called “Amendments to IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability”. The amendment was included in the Commission Regulation (EU) 2024/2862 published on 13 November 2024 adjusting the amendments made by the IASB to IAS 21. The document requires an entity to apply a methodology consistently in order to verify whether one currency can be converted into another and, when this is not possible, outlines how to determine the exchange rate to be used and the disclosure to be provided in the notes to the consolidated financial statements. The amendment will apply from 1 January 2025, but early application is permitted.
- On 18 July 2024, the IASB published a document called “*Annual Improvements Volume 11*”. The document includes clarifications, simplifications, corrections and changes aimed at improving the consistency of various IFRS Accounting Standards. The amended standards are:
 - IFRS 1 First-time Adoption of International Financial Reporting Standards;
 - IFRS 7 Financial Instruments: Disclosures and related guidelines on the implementation of IFRS 7;
 - IFRS 9 Financial Instruments;
 - IFRS 10 Consolidated Financial Statements; and
 - IAS 7 Statement of Cash Flows.

The amendments will apply from 1 January 2026, but early application is permitted.

- On 18 December 2024, the IASB published an amendment called “Contracts Referencing Nature-dependent Electricity – Amendment to IFRS 9 and IFRS 7”. The document aims to support entity in reporting the financial effects of contracts for the purchase of electricity produced from renewable sources (often structured as Power Purchase Agreements). On the basis of these contracts, the amount of electricity generated and purchased may vary based on uncontrollable factors such as weather conditions. The IASB has made targeted amendments to IFRS 9 and IFRS 7. The amendments include:
 - a clarification regarding the application of the “own use” requirements to this type of contracts;
 - the criteria for allowing these contracts to be accounted for as hedging instruments; and,
 - the new disclosure requirements to allow users of the financial statements to understand the effect of these contracts on the financial performance and cash flows of an entity.

The amendment will apply from 1 January 2026, but early application is permitted.



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

With reference to the accounting standards and amendments not yet endorsed, or already endorsed but not mandatorily applicable or not adopted early by the Group, no effects on the Group's consolidated financial statements have been reported.

The consolidated financial statements is comprised of the Consolidated Balance Sheet and Consolidated Income Statement, Statement of Consolidated Comprehensive Income, Statements of Changes in Consolidated Shareholders' Equity as well as these Consolidated Notes to the financial statements, all drawn up in thousands of Euro.



A.1 – GENERAL PART

1. Equity investments in wholly-owned subsidiaries.

Section 3.
Consolidation
scope and
methods

Company Name	Headquarters	Registered Office	Type of relationship (1)	Shareholding Relationship		% Voting Rights (2)
				Investing Company	%	
A. Companies						
A.1 Companies consolidated line-by-line						
1. Immobiliare Maristella S.r.l.	Asti	Asti	1	Cassa di Risparmio di Asti S.p.A.	100.00	100.00
2. Pitagora S.p.A.	Turin	Turin	1	Cassa di Risparmio di Asti S.p.A.	56.50	56.50
3. We Finance S.p.A.	Milan	Turin	1	Pitagora S.p.A.	53.11	53.11
5. Asti Group PMI S.r.l.*	Rome	Rome	4	Cassa di Risparmio di Asti S.p.A.	0	0
6. Asti Group RMBS II S.r.l.*	Rome	Rome	4	Cassa di Risparmio di Asti S.p.A.	0	0
7. Asti Group RMBS III S.r.l.*	Rome	Rome	4	Cassa di Risparmio di Asti S.p.A.	0	0
8. Asti Group RMBS IV S.r.l.*	Rome	Rome	4	Cassa di Risparmio di Asti S.p.A.	0	0
9. Milone CQS S.r.l.	Conegliano	Conegliano	4	Cassa di Risparmio di Asti S.p.A.	0	0
10. Manu SPV S.r.l.*	Conegliano	Conegliano	4	Pitagora S.p.A.	0	0
11. Aida SPV S.r.l.*	Conegliano	Conegliano	4	Pitagora S.p.A.	0	0

*Special purpose vehicle (SPV) for securitisation transactions of loans implemented by the Group.

Key

(1) Type of relationship:

1. majority of voting rights at ordinary shareholders' meetings
2. dominant influence at ordinary shareholders' meetings
3. agreements with other shareholders
4. other forms of control
5. unified management under Article 26, paragraph 1 of Italian Legislative Decree 87/92
6. unified management under Article 26, paragraph 2 of Italian Legislative Decree 87/92

(2) Votes available in the ordinary shareholders' meeting, distinguishing between actual and potential.

Line-by-line consolidation consists in the line-by-line acquisition of the balance sheet and income statement aggregates of the subsidiaries. Following the attribution to minority interests, in separate items, of their portions of shareholders' equity and profit (loss), the equity investment will be eliminated as an offsetting entry to shareholders' equity of the subsidiary.

The assets, liabilities, income and expenses recognised between consolidated companies, as well as dividends collected, are also netted.

During 2022, the Group's scope of consolidation changed as a result of the acquisition by the subsidiary Pitagora of a further stake in the financial company We Finance S.p.A. corresponding to 10% of the share capital, bringing the total stake to 75%. The investee company We Finance is consolidated in the consolidated financial statements using the line-by-line method. In 2023, the company We Finance, in partial execution of a shareholders' proxy, increased its share capital by offering in option 1,500,000 shares to all shareholders at the price of € 1 each. As a result of the offer, Pitagora subscribed to its stake and also to the shares that remained unopted, thus bringing its interest to 76.15%. During 2024, the subsidiary Pitagora purchased



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

a further 696,000 shares, thus bringing its total stake to 94% of the share capital of We Finance S.r.l. The stake held indirectly by the Parent Company is 53.11%.

During the fourth quarter of 2024, the Bank sold 6.5% of the share capital held in Pitagora to Iccrea: this transaction brought the Bank's stake in the capital of Pitagora to 56.5% as at 31 December 2024. More details on the transaction are summarised in the paragraph “Sale to Iccrea of a stake in Pitagora” of these accounting policies.

Also included in the scope of consolidation are shareholdings over which the Parent Company exercises significant influence, as the shares held indirectly are between 20% and 50%. These companies are carried at equity. In 2023, the subsidiary Pitagora purchased 40% of the shares of the company Fa.ro S.r.l.

Company Name	Headquarters	Registered Office	Shareholding Relationship	
			Investing Company	%
Edera S.r.l.	Turin	Turin	Pitagora S.p.A.	35.00
Fa.ro. S.r.l.	Rome	Rome	Pitagora S.p.A.	40.00

2. Significant assessments and assumptions for determining the scope of consolidation

In drawing up the consolidated financial statements as at 31 December 2024, account was taken of the standards endorsed through Regulation 1254 of the European Commission, IFRS 10, IFRS 11 and IFRS 12, and the amendments to IAS 27 and IAS 28, with mandatory application since 2014.

The standards and amendments to existing standards aim to provide a single model for consolidated financial statements which envisage the presence of control and de facto control as the basis for consolidation of all possible types of entities. To have control over an entity, the investor must have the ability, deriving from a legally understood right or even a de facto situation, to significantly impact the type of operating decisions to be taken regarding the entity's relevant activities and be exposed to the variability of the entity's results. The scope of consolidation is determined in compliance with the provisions contained in IFRS 10 Consolidated Financial Statements. The Parent Company consolidates an entity when the three elements of control (1. power over the acquired company; 2. exposure, or rights, to variable returns deriving from involvement with the same; 3. ability to use the power to influence the amount of these returns) are satisfied.

The scope of line-by-line consolidation of the Group includes the special purpose vehicles for securitisation transactions attributable to entities over which the Group substantially holds control, even though it does not have voting rights or equity investments in the share capital. The inclusion in the scope of consolidation derives from the fact that these are securitisation transactions that did not allow the derecognition of the transferred receivables and therefore transactions in which the substantiality of the risks and benefits associated with these receivables remains with the Group.



A.1 – GENERAL PART

3. Equity investments in wholly-owned subsidiaries with significant minority interests

For equity investments subject to Parent Company control, minority interests hold 43.5% of the share capital of Pitagora S.p.A., which is 16.34%-owned by Bonino S.r.l., 20%-owned by Iccrea and 7.16%-owned by employees of the company and third parties. The Group does not hold equity investments in the special purpose vehicles for securitisations (SPV) and, therefore, those entities are fully attributable to the capital of third parties.

3.1 Minority interests, voting rights and dividends distributed to third parties

Company Name	% Minority interests	% Voting Rights (1)	Dividends distributed to third parties
A. Companies			
1. Pitagora S.p.A.	43.50	43.50	1,409
2. We Finance	46.89	46.89	0
3. Asti Group PMI S.r.l.	100.00	100.00	0
4. Asti Group RMBS II S.r.l.	100.00	100.00	0
5. Asti Group RMBS III S.r.l.	100.00	100.00	0
6. Asti Group RMBS IV S.r.l.	100.00	100.00	0
7. Milone CQS S.r.l.	100.00	100.00	0
8. Manu SPV S.r.l.	100.00	100.00	0
9. Aida SPV S.r.l.	100.00	100.00	0

(1) Voting rights in ordinary shareholders' meeting

3.2 Equity investments with significant minority interests: accounting information

Figures as at 31/12/2024

Company Name	Total assets	Cash and cash equivalents	Financial assets	Property, plant and equipment and intangible assets	Financial liabilities	Shareholders' equity
A. Companies						
1. Pitagora S.p.A.	586,131	2,866	536,757	19,197	414,768	87,112
2. We Finance S.p.A.	7,730	2,441	2,127	505	312	3,035



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

Company Name	Net interest margin	Net banking income	Operating costs	Profit (loss) before tax from continuing operations	Profit (loss) after tax from continuing operations
A. Companies					
1. Pitagora S.p.A.	1,321	72,057	-52,680	15,489	9,512
2. We Finance S.p.A.	-3	3,873	-3,647	415	71

Company Name	Profit (loss) from discontinued operations	Profit (loss) for the year (1)	Other income after tax (2)	Total income (3) = (1) + (2)
A. Companies				
1. Pitagora S.p.A.	0	9,512	-1	9,511
2. We Finance S.p.A.	0	71	-6	65

4. Significant restrictions

With regard to subsidiaries included in the scope of consolidation of the Cassa di Risparmio di Asti Group, there are no significant restrictions on the Parent Company's ability to access assets or use them, or to pay off the liabilities of the Group.

5. Other information

The individual financial statements as at 31 December 2024 prepared by the subsidiaries were used for the preparation of the Accounting Statements as at 31 December 2024, adjusted, if applicable, to align them with the IAS/IFRS adopted by the Parent Company (Immobiliare Maristella S.r.l.).

Section 4. Events subsequent to the reference date of the Accounting Statements It is noted that, after the reporting date of the consolidated financial statements (31.12.2024) and before the preparation hereof, there were no significant events that could change the valuations and disclosure set out in this document.

Section 5. Other matters The preparation of the consolidated financial statements requires the formulation of reasonable estimates and assumptions, based on the information available at the time they are drawn up and the adoption of subjective assessments, based on past experience, in order to achieve adequate recognition of operating events.

The Directors are required to assess the going concern assumption and the consistency of the business models for the management of financial assets. The directors must evaluate the existence of events and circumstances limiting the company's capacity to continue to operate as a going concern within a time horizon of at least 12 months, taking into account all available information in relation to customer insolvency, changes and slowdowns in the business, market volatility and as a result the current and future profitability of the company.



A.1 – GENERAL PART

Aware that the effects on business continuity are not particularly easy to define, the Directors used a forward-looking procedure to assess the Group's capacity to continue operating as a going concern.

During the second half of 2024, the Group commenced activities for the new 2025-2027 Strategic Plan, focusing on the planning of activities and assessment of the sustainability of the business model in light of changed reference macroeconomic and financial scenarios, which was approved by the Board of Directors on 6 February 2025.

The main factors of uncertainty that may affect the future scenarios in which the Group will operate include the negative effects on the global and Italian economies directly or indirectly linked to the persistence of wars (in particular in Europe and the Middle East) and the macroeconomic scenario characterised by significant geopolitical tension. Furthermore, an element of future uncertainties is undoubtedly the awareness of an increasing climate risk to which all future scenarios are exposed. With regard to business development, the guidelines and action levers of the Group's 2022-2024 Strategic Plan are also fully confirmed in the new 2025-2027 Strategic Plan.

In addition, with the introduction of the Sustainability Plan, the three-year Plan provided for the evolution of the approach to ESG issues in order to concretely implement the company's actions and objectives and to make it an integral part of the Group's strategies.

Having considered the level of capitalisation to be satisfactory, and considering that the Group has a consolidated history of profitable business and privileged access to financial resources, as a commercial Bank, the Directors reasonably expect, even in the current context, to continue to operate in the foreseeable future. Therefore, they have prepared the Consolidated Financial Statements as at 31 December 2024 based on the going concern assumption.

By their nature, the estimates and assumptions applied may vary from one period to another and, therefore, it cannot be ruled out that in subsequent periods the actual amounts stated in the consolidated financial statements may differ, even to a significant extent, as a result of changes in the reasonable subjective estimates, assumptions and assessments made.

In this regard, an illustration is provided below of the estimation processes that require the use of significant elements of judgement in the selection of underlying hypotheses and assumptions and the consequent application solutions adopted by the Group.

The main cases where it is necessary for the party drawing up the consolidated financial statements to use discretionary assessments are as follows:

- quantification of impairment losses on loans and, more generally, financial assets;
- determination of the fair value of financial instruments to use for disclosure purposes; in particular the use of valuation models to measure the level 3



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

fair value of financial instruments not listed on active markets and for which there are no other parameters observable on the market that could be used in the valuation techniques;

- the estimates and assumptions used for the purpose of measuring the equity investments in relation to the verification of any impairment;
- quantification of provisions for risks and charges;
- demographic assumptions (linked to the forecast mortality of the population) and financial assumptions (deriving from the possible evolution of the financial markets) used to define provisions for personnel;
- estimates and assumptions used to assess the recoverable amount of goodwill;
- estimates and assumptions on the recoverability of deferred tax assets.

To identify the impacts of the current market context on owned real estate assets and rights of use pursuant to IFRS 16, analyses were conducted on the economic situation, the trend in real estate market prices and transactions in relation to the territorial distribution of the properties owned by the Group and rights of use.

As regards the real estate market, the latest available EUROSTAT figures on nominal house prices refer to the second quarter of 2024 and, for the EU, in terms of year-on-year trend changes (compared to the second quarter of 2023), show an increase of 1.3% in the Eurozone. These statistics encompass those of ISTAT prepared for Italy, as part of a standard recording method established by EUROSTAT. In Italy, according to ISTAT, house prices in the second quarter of 2024 have increased by 3.2% compared to the previous quarter and increased by 2.9% compared to the second quarter of 2023.

In the residential sector, home purchases and sales in the third quarter of 2024 recorded an increase that in trend terms stood at 2.7% at national level, compared to the same period of 2023, and which concerns, albeit with slightly different intensities, all territorial areas.

For the non-residential sector, 2024 is confirmed as a positive year for the non-residential property market which, also in the third quarter, shows a general increase in purchases and sales, 3.8% more than in the same period of 2023.

The overall increase in volumes is across the board, from the service-commercial sector, which shows a trend growth of 3.8%, to the production sector, up by almost 2%, to the other destinations sector, which shows a change of 4.8%.

In summary, in line with the performance of the second quarter and in contrast to the first quarter, home exchanges are growing and in terms of prices there is a recovery in value, both compared to the second quarter of 2024 and on an annual basis. For the non-residential market, there was a new increase in real estate trading, confirming the good performance of the previous quarters.

Therefore, in relation to the real estate assets and the rights of use, there are no trigger events that indicate any impairment loss in their book value.

In 2024, the European Central Bank (ECB) made four interest rate cuts during the meetings of the Governing Council on 6 June 2024, 12 September 2024, 17 October 2024 and 12 December 2024. On these four occasions, the main deposit rate was



A.1 – GENERAL PART

reduced by a total of 125 basis points to 3.00%, the main refinancing rate to 3.15% and the marginal refinancing rate to 3.40%. These interventions were mainly motivated by the reduction in inflation recorded during the year.

The ECB has signalled its willingness to further review its monetary policy in 2025 in accordance with the evolution of economic and inflationary forecasts.

Inflation remains stable, the overall index slowed down in December but remains above the 2% target.

As at 31 December 2024, with reference to the book value, the Group's government securities portfolio consisted entirely of EU member state government bonds (75.49% Italian government bonds and the remaining 24.51% bonds from Spain, Romania and France) of which 68.97% classified in the accounts at amortised cost (HTC) and 31.03% in the FVOCI portfolio. With reference to fair value, the Group's government securities portfolio consists of Italian government securities (74.92%) and the securities of Spain, Romania, Belgium and France for the remaining 33.48%.

The impairment on securities in the portfolio was calculated on the basis of the PD and LGD risk metrics provided by the Infoprometeia: for the majority of the portfolio represented by securities issued by the Italian State, the value of PD 1 year associated with the issuer (linked to the performance of the 5-year CDS in Italy), at the end of the third quarter of 2024 was lower than both the end of the first half of 2024 and the end of the previous year (values which were substantially in line with the previous ones).

Again with reference to the Italian government bonds in the owned securities portfolio, in terms of hedge accounting, there are hedges (fair value hedging) consisting of IRS-type derivative instruments entered into against the interest rate risk attributable to these instruments.

The quantification of the hedging of performing loans (Stage 1 and Stage 2) as at 31 December 2024 was carried out according to a methodology widely used in the banking system and which is in line with the provisions of international accounting standards.

The risk parameters, estimated according to this methodology, reflect two fundamental elements that directly affect the risk assessment of the loan portfolio:

- the year-on-year evolution of the quality of the loan portfolio, observed and calculated in terms of the number of migrations from a performing to a non-performing status (portfolio component);
- the prospective expectations of national and international economic performance (macroeconomic component).

With regard to the latter component, its quantification takes place through the use of a set of statistical models that relate the developments of the main macroeconomic variables and the observed dynamics of the default rates. These statistical models take into account the geographical characteristics of the counterparties, as well as the sectors of economic activity of the corporate customers.



PART A
ACCOUNTING
POLICIES A.1 – GENERAL PART

By feeding the above statistical models with prospective input data from infoproducer sources, the forward-looking risk metrics were estimated with a multi-scenario approach. This approach provides for the application of weighting percentages to the forecast development scenarios of the economic cycle (30% DOWN scenario, 30% UP scenario, 40% BASELINE scenario).

With regard to non-performing loans (Stage 3), the related assessment takes into account the various alternative scenarios that could presumably occur in the near future. In line with the provisions of the reference regulations, the definition of provisions for non-performing loans (and consequently of the corresponding probable sales) takes into consideration different alternative scenarios identified for their management. In particular, on the basis of what is reported in the ITG *“Inclusion of cash flows expected from the sale on default of loan”* of the IFRS Foundation staff and in the EBA Guidelines on “Management of non-performing and forborne exposures” (EBA/GL/2018/06) for the proactive management of NPLs, forward-looking factors that include possible sales scenarios are taken into account, with effects in terms of valuation also for non-performing loans, if they represent a possible method of realising cash of flows.

In particular, the following two macro-scenarios have been identified:

- direct management: treatment of the exposure in line with the ordinary management methods, in order to pursue the maximum recovery possible over the medium/long term, managing the non-performing loan through the Bank's operational structures and processes (internal management), or availing of specialised operators, also on a permanent basis;
- assignment: disposal of the loan through assignment to counterparties operating on the market, according to an approach of maximising recovery over a more limited time frame, immediately benefiting from savings in terms of resources (liquidity, capital, workforce).

The total amount of the presumed recovery is determined at the level of single account, as the average of the corresponding recoverable amounts deriving from the application of the various scenarios, weighted for the correlated probabilities of occurrence.

More details on the methods for determining expected losses on performing and non-performing loans are provided in the section “Methods of determining impairment losses” of this document.

For non-financial assets, given the economic crisis triggered by the Russia-Ukraine conflict and the Israeli-Palestinian conflict and the macroeconomic context, the Group verified the presence of elements indicating impairment of non-financial assets.

Specifically, the DTAs recognised in the Consolidated Accounting Statements assets were subject to probability testing, taking into account the new plan and economic and financial projections updated as a result of the changed economic context: the test confirmed that future profitability guarantees the re-absorption of deferred taxation recognised as at 31 December 2024.



A.1 – GENERAL PART

In line with the Group policies, the provisions of IAS 36 and the Exposure Draft of 10 July 2020 issued by the Italian Assessment Body, the planned impairment test activities were carried out in relation to intangible assets and goodwill.

The impairment test was conducted with reference to the configuration of value in use, determined on the basis of the *Dividend Discount Model* (DDM) methodology, developed on the basis of the CGU's financial position as of 31 December 2024 and the economic and financial projections for the 2025-2029 period approved by the Board of Directors. The valuation parameters were updated on the basis of the market situations at the reporting date.

In light of the analysed internal and external trigger events and the results of the impairment test carried out as at 31 December 2024, the headrooms, the sensitivities and the limit levels of the valuation metrics, there are no elements that may suggest an impairment loss in goodwills and intangibles.

The Group applies the “domestic tax consolidation” regime, governed by Articles 117-129 of the Consolidated Income Tax Act (TUIR) introduced by Italian Legislative Decree 344/2003, as amended. This consists of an optional regime, under which the total net tax income or loss of each investee participating in the tax consolidation is transferred to the parent company, on which a single taxable income or single tax loss that may be carried forward is determined and, as a result, a single tax liability/credit.

In addition to the Parent Company, the option involves the investee company Pitagora S.p.A. and the company Immobiliare Maristella S.r.l.

As at the date of these Consolidated Accounting Statements, there are no new entries to the tax consolidation.

The 2025 Budget Law, i.e. Italian Law 207 of 30 December 2024, presented to the Parliament on 23 October 2024 and approved on 30 December 2024, had no impact on the figures in the Consolidated Accounting Statements as at 31 December 2024.



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

The criteria adopted for drawing up the Consolidated Accounting Statements, in application of the IAS/IFRS accounting standards in force at the date of preparation of the consolidated financial statements, communicated to the Board of Statutory Auditors, are illustrated below.

1 - Financial assets measured at fair value through profit or loss (FVTPL)

Classification criteria: this category includes financial assets other than those classified under financial assets measured at fair value through other comprehensive income and under financial assets measured at amortised cost.

This item includes:

- financial assets held for trading and the positive value of derivatives. These are financial assets (debt securities, equity securities and units of UCITS) held for the purpose of realising cash flows through their sale, and obtaining a profit in the short term. These are financial assets associated with the “Others” business model;
- financial assets designated at fair value, comprised of debt securities and loans, which on initial recognition are irrevocably designated at fair value when that designation is required to eliminate or drastically reduce inconsistency in valuation;
- financial assets mandatorily measured at fair value, represented by debt securities, equity securities, loans or units of UCITS that do not meet the requirements for measurement at amortised cost or fair value through other comprehensive income. These are financial assets with contractual terms that not only require the repayment of principal and payment of interest flows calculated on the amount of principal to be repaid, or which are held under the Hold to Collect and Sell business model.

The accounting standard IFRS 9 does not permit the reclassification of financial assets to other categories, save for cases where the entity changes its business model with regard to the management of such assets. On the occurrence of those events, which are not very frequent, financial assets measured at fair value through profit or loss may be reclassified to one of the other two categories of financial assets measured at amortised cost or financial assets measured at fair value through other comprehensive income. The transfer value is represented by the fair value at the time of the reclassification and the effects of the reclassification apply prospectively from the first reporting date following the change in the business model. In this case, the effective interest rate of the reclassified financial asset is calculated based on its fair value at the reclassification date and this date is considered as the initial recognition date in assigning it to the various credit risk stages for purposes of impairment.

Recognition criteria: financial assets measured at fair value through profit or loss are initially recognised at the settlement date, if settled with time frames used in market practice (regular way); otherwise at the trade date. In the event of recognition of financial assets at the settlement date, the profits and losses recognised from the trade date to the settlement date are charged to the income statement.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Financial assets measured at fair value through profit or loss are initially recognised at fair value, which generally equals the consideration paid. The related transaction costs or income is posted directly to the income statement.

Measurement criteria and revenue recognition criteria: subsequent to initial recognition, financial assets measured at fair value through profit or loss are measured at fair value. In the event that the fair value of a financial asset is negative, that financial instrument is recorded as a financial liability. The effects of applying this measurement approach are recorded in the income statement.

For more information on the business models, the methods of determining expected losses and impairment, refer to paragraph 15 – Other information.

The fair value of financial instruments is determined in line with that set out in section “A.4 - Information on fair value”.

Derecognition criteria: financial assets are derecognised when the right to receive cash flows no longer exists, or where all the risks and benefits connected with holding those specific assets are substantially transferred.

Classification criteria: this category includes debt securities and loans that meet both of the following two conditions:

- they are held under a business model that envisages both the collection of cash flows set out by contract and the sale (HTCS);
- the contractual terms and conditions of the financial assets require, at specific dates, the collection of cash flows solely comprised of payment of principal and interest on the amount of principal to be repaid (passing the SPPI test).

This item also includes equity securities, not held for trading purposes, for which the option to designate at fair value through other comprehensive income was exercised at the time of initial recognition. This option is irrevocable.

The accounting standard IFRS 9 does not permit the reclassification of financial assets to other categories, save for cases where the entity changes its business model with regard to the management of such assets. On the occurrence of those events, which are not very frequent, financial assets measured at fair value through other comprehensive income may be reclassified to one of the other two categories of financial assets measured at amortised cost or financial assets measured at fair value through profit or loss. The transfer value is represented by the fair value at the time of the reclassification and the effects of the reclassification apply prospectively from the first reporting date following the change in the business model. If assets are reclassified from this category to the amortised cost category, the accrued profit (loss) recorded in the valuation reserve is adjusted to the fair value of the financial asset at the reclassification date. In the case of reclassification in the category of fair value through profit or loss, the accrued profit (loss) previously recorded in the valuation reserve is reclassified from shareholders' equity to profit (loss) for the reporting period.

Equity securities for which the option was exercised cannot be reclassified.

**2 - Financial assets
measured at fair value
through other
comprehensive
income
(FVOCI)**



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Recognition criteria: financial assets measured at fair value through other comprehensive income (FVOCI) are initially recognised at the settlement date, if settled with time frames used in market practice (regular way); otherwise at the trade date. In the event of recognition of financial assets at the settlement date, the profits and losses recognised from the trade date to the settlement date are charged to shareholders' equity.

Financial assets measured at fair value through other comprehensive income are initially recognised at fair value, which generally equals the consideration paid, including transaction costs or income.

Measurement criteria and revenue recognition criteria: following initial recognition, financial assets measured at fair value through other comprehensive income other than equity securities are recorded using the amortised cost method, and are valued at fair value. The effects of a change in fair value are recognised in a specific shareholders' equity reserve up to the time the financial asset is derecognised. Instead, the effects deriving from the calculation of amortised cost and those relating to impairment are recognised in the income statement.

Equity instruments for which the irrevocable option of classification under financial assets measured at fair value through other comprehensive income was exercised are measured at fair value with impact on a specific shareholders' equity reserve, which must never be transferred to the income statement, even in the event of derecognition due to the sale of the financial asset. For these equity securities, the only components that continue to be recognised in the income statement are represented by dividends.

The fair value of financial instruments is determined in line with that set out in section "A.4 - Information on fair value".

Debt securities and loans classified under financial assets measured at fair value through other comprehensive income are tested, at the end of each reporting period, for a significant increase in credit risk, recognising the resulting adjustment in the income statement. For financial assets classified in stage 1, the expected loss recognised is that with a time horizon of 12 months. For financial assets classified in stages 2 and 3, the expected loss recognised is that with a time horizon equal to the entire residual life of the financial instrument.

For more information on the business models, the methods of determining expected losses and impairment, refer to paragraph 15 – Other information.

Derecognition criteria: financial assets are derecognised when the right to receive cash flows no longer exists, or where all the risks and benefits connected with holding those specific assets are substantially transferred.

**3 - Financial assets
measured at
amortised cost**

Classification criteria: this category includes debt securities and loans that meet both of the following two conditions:

- they are held under a business model that envisages the collection of cash flows set out by contract (Hold to Collect);



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

- the contractual terms and conditions of the financial assets require, at specific dates, the collection of cash flows solely comprised of payment of principal and interest on the amount of principal to be repaid (passing the SPPI test).

This item comprises loans and advances to banks and loans and advances to customers disbursed directly or acquired from third parties, trade receivables, contangos, repurchase agreements and operating loans connected with the provision of financial services.

IFRS 9 does not permit the reclassification of financial assets to other categories, save for cases where the entity changes its business model with regard to the management of such assets. On the occurrence of those events, which are not very frequent, financial assets measured at amortised cost may be reclassified to one of the other two categories of financial assets measured at fair value through other comprehensive income or financial assets measured at fair value through profit or loss. The transfer value is represented by the fair value at the time of the reclassification and the effects of the reclassification apply prospectively from the first reporting date following the change in the business model. Profits and losses resulting from the difference between the amortised cost of a financial asset and its fair value are recognised in the income statement in the event of reclassification under Financial assets measured at fair value through profit or loss and in Shareholders' equity, in the specific valuation reserve, in the event of reclassification under Financial assets measured at fair value through other comprehensive income.

Recognition criteria: financial assets measured at amortised cost are recognised only when the Group becomes a party to the loan agreement. This means that the loan must be unconditional and that the Group acquires the right to payment of the contractually agreed amounts.

Loans are initially recognised on the disbursement date or, for debt securities, the settlement date, based on their fair value, which normally equals the amount disbursed or the subscription price, including the transaction costs/income directly attributable or determinable from the origin of the transaction, even if liquidated at a later time. This includes costs which, though having the above characteristics, are repaid by the borrower. In the event of receivables deriving from the sales of goods or the provision of services, the recognition is connected with the moment of sale or completion of the provision of service and, that is, the time in which it is possible to recognise the income and, as a result, the right to receive it arises.

Measurement criteria and revenue recognition criteria: following initial recognition, the financial assets are measured at amortised cost using the effective interest rate method. The amortised cost is equal to the value originally recognised - decreased by the repayments of principal and value adjustments, and increased by any recoveries - and the amortisation of the difference between the amount disbursed and that repayable on maturity, attributable to directly attributable



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

transaction costs/income. The effects deriving from the calculation of amortised cost and those relating to impairment are recognised in the income statement.

At each reporting date, financial assets measured at amortised cost are tested for a significant increase in credit risk, recognising in the income statement the resulting adjustment pursuant to the rules set out by IFRS 9. For financial assets classified in stage 1, the expected loss recognised is that with a time horizon of 12 months. For financial assets classified in stages 2 and 3, the expected loss recognised is that with a time horizon equal to the entire residual life of the financial instrument.

The amount of value adjustments is equal to the difference between the carrying amount of the assets at the time of valuation and the present value of expected cash flows. In the event of value adjustments, the carrying amount of the asset is decreased by establishing a bad debt provision that adjusts the asset and the amount of that adjustment is recorded in the income statement. Where, in a subsequent period, the amount of that value adjustment decreases, and that decrease is objectively attributable to an event that occurred following the determination of the write-down, such as an improvement in the borrower's creditworthiness, the value adjustment previously recorded is eliminated or reduced by recording a recovery in the income statement. That recovery cannot, in any case, exceed the amortised cost that the receivable would have had in the absence of the previous adjustments.

For more information on the business models, the methods of determining expected losses and impairment, refer to paragraph 15 – Other information.

Derecognition criteria: financial assets are derecognised when the right to receive cash flows no longer exists, or where all the risks and benefits connected with holding those specific assets are substantially transferred, or when the receivable is considered definitely irrecoverable after all the necessary recovery procedures have been completed.

Conversely, where legally the ownership of the receivables has been effectively transferred but the Group substantially retains all the risks and benefits, the receivables continue to be recognised under assets, recording a liability for the consideration received from the purchaser. In particular, the Group includes securitised loans among its loans and advances to customers. As an offsetting entry to those loans, a liability was posted under the item "Deposits from customers", net of the value of the securities issued by the vehicle (SPV) and repurchased by the Group, and net of cash reserves.

4 - Hedging transactions The Group opted to apply the option set out in IFRS 9 to continue to fully apply the provisions of IAS 39 on hedge accounting.

Type of hedge: risk-hedging transactions are aimed at offsetting any potential losses on a certain element or group of elements that may arise from a specific risk, with the profits made on a different element or group of elements, should that particular risk effectively occur. The possible types of hedges used by the Group are:



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

- cash flow hedges, the objective of which is to stabilise the flow of interest of floating rate funding, to the extent to which the latter finances fixed rate loans;
- fair value hedges, the objective of which is to hedge the exposure to changes in fair value of an item at the reporting date.

For all types of hedge transactions, in the phase of FTA of IFRS 9, the Group opted to apply, in line with the past, the provisions of IAS 39 (carve-out) on hedge accounting.

Recognition criteria: hedging financial derivatives, like all derivatives, are initially recorded and subsequently measured at fair value.

Measurement criteria: hedging derivatives are measured at fair value.

In cash flow hedges, changes in the fair value of the derivative are charged to shareholders' equity, to the extent that the hedge is effective, and are recognised in the income statement only when, with regard to the hedged item, there is a change in the cash flows to be offset or when the hedge is ineffective. The derivative instrument is designated as a hedging instrument if there is official documentation regarding the connection between the instrument hedged and said hedging instrument, and if it is effective at the moment in which the hedging begins and throughout the life of the same.

The effectiveness of the hedge is documented by assessing the comparison of the changes in cash flows of derivatives attributed to the specific years, and the changes in cash flows of the planned, hedged transactions.

The hedged instrument is recognised at amortised cost.

In the case of fair value hedging, the changes in the fair value of the hedged asset are offset by the changes in the fair value of the hedging instrument. This offsetting is recognised by recording the changes in value in the income statement, for both the item hedged (as regards changes produced by the hedged risk factor) and the hedging instrument. Any differences, which represent the partial ineffectiveness of the hedge, constitute the net economic result.

The effectiveness of cash flow hedges and fair value hedges is assessed at each reporting date: if the tests do not confirm the hedge effectiveness, from that time, the recording of the hedging transactions, in accordance with that shown above, is stopped and the portion of the derivative contract that is no longer a hedge (over hedging) is reclassified under trading instruments. If the interruption of the hedge relationship is due to the sale or extinction of the hedging instrument, the hedged instrument ceases to be hedged and is once again measured according to the criteria of the portfolio it is assigned to.

Derivatives which are considered as hedging instruments from an economic viewpoint because they are operationally linked with financial liabilities measured at fair value (Fair Value Option) are classified among trading derivatives; the respective positive and negative differentials or margins accrued until the end of the reporting period are recognised, in accordance with their hedging purpose, as interest income and interest expense, while valuation gains and losses are posted under the income



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

statement, “Net profit (loss) from financial assets and liabilities measured at fair value”.

5 - Equity investments

Classification criteria: the term equity investments means investments in the capital of other companies, generally represented by shares or units, and classified as controlling interests or stakes in associates. The following definitions are used, in particular:

- subsidiary: company over which the parent exercises “dominant control”, i.e. the power to determine the administrative and management decisions and obtain the related benefits;
- associate: company in which the investor holds significant influence but which is not a subsidiary or a joint venture for the investor.

In order to hold significant influence, direct ownership, or indirect ownership through subsidiaries, of 20% or the majority share of votes that can be exercised in the shareholders’ meeting of the investee must be held.

Other minor equity investments receive the treatment set out in IFRS 9, are classified among Financial assets measured at fair value through profit or loss (FVTPL) or Financial assets measured at fair value through other comprehensive income (FVOCI).

Recognition criteria: equity investments are initially recognised on the settlement date, if traded with the time frames used in market practice (regular way); otherwise at the trade date.

Equity investments are initially recognised at cost.

Measurement criteria and revenue recognition criteria: equity investments in subsidiaries or associates are measured at cost, possibly adjusted due to impairment. Investments in related or significantly influenced companies that are not fully consolidated shall be measured using the equity method.

If objective evidence of impairment indicates that there may have been a loss in value of an equity investment, then the recoverable amount of the equity investment is estimated, taking into consideration the present value of future cash flows that the equity investment may generate, including the final disposal value of the investment (impairment test).

If the recoverable amount is lower than the carrying amount, the difference is recognised in the income statement under item 250 “Gains (losses) on equity investments”.

Where the reasons for the impairment no longer apply as a result of an event occurring following the recognition of a value adjustment, the related recoveries are posted to the same income statement item, but within the limit of the cost of the equity investment prior to the write-down.

Dividends of investees are recorded during the year in which they are decided, in the income statement, under item 70 “Dividends and similar income”.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Derecognition criteria: equity investments are derecognised when the contractual rights to the cash flows deriving from the assets expire, or where the equity investment is sold, substantially transferring all the connected risks and benefits.

Classification criteria: this item mainly includes land, buildings used in the business and those held for investment, plant, vehicles, furniture, furnishings and equipment of any type, and the rights of use acquired through leases, relating to the use of property, plant and equipment pursuant to IFRS 16.

Assets held for use in supplying goods and services, or for administrative purposes are defined as used in the business, while investment assets include properties held for the purpose of receiving rents, to appreciate the capital invested or for both reasons.

Recognition criteria: property, plant and equipment are initially recognised at the purchase or manufacture cost, including all possible additional charges directly attributable to the purchase and start-up of the asset.

Extraordinary maintenance expenses are included in the carrying amount of the asset or recorded as separate assets, as appropriate, only when it is likely that the associated future economic benefits will flow to the company and the cost can be reliably assessed. Expenses for repairs, maintenance or other works to guarantee the operation of the assets are posted to the income statement in the year they are incurred.

The depreciation process is not carried out on low value operating assets. As a result, their value is posted in the income statement for the year of purchase, when their exclusion is deemed irrelevant or insignificant for the purposes of improving disclosure.

Measurement criteria and revenue recognition criteria: following initial recognition, property, plant and equipment, including properties not used in the business, are posted at cost, net of the total amount of depreciation and accumulated impairment. Property, plant and equipment are systematically depreciated over their useful lives, on a straight-line basis. Land is not depreciated, whether acquired separately or incorporated into the value of the buildings, since it has an indefinite life. Works of art are not depreciated, as their useful life cannot be estimated and the related value is usually bound to increase over time.

In the case of detached properties for which the Group fully owns the land, but whose value is incorporated in the value of the buildings, by virtue of the application of the component approach, these should be considered as assets that can be separated. In that case, the division of the value of the land and the value of the building is carried out based on a specific appraisal conducted by the competent function.

**6 - Property, plant
and equipment**



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

The depreciation process begins when the asset is available and ready for use, i.e. when it is in the place and in the conditions necessary to be operated. In the first year, depreciation is recognised in proportion to the period of actual use of the asset. Assets subject to depreciation are adjusted for possible impairment each time events or changes in situations indicate that the carrying amount might not be recoverable. Impairment losses are recognised in amounts equal to the excess of the carrying amount over the recoverable amount. Any adjustments are posted to the income statement.

Where the reasons for impairment cease to exist, a reversal is recognised, which shall not exceed the carrying amount that would have been determined (net of depreciation) had no impairment loss been recognised for the asset in prior periods.

Derecognition criteria: fixed assets are derecognised from the balance sheet at the time of sale or when they are permanently retired from use and, as a result, no future economic benefits are expected to derive from their sale or use. Capital gains and losses deriving from the disposal or sale of property, plant and equipment are calculated as the difference between the net sale price and the carrying amount of the asset and are recorded in the income statement on the same date in which they are eliminated from the accounts.

7 - Intangible assets

Classification criteria: intangible assets are identifiable, non-monetary assets without physical substance that are held for use over several years. Intangible assets also include goodwill, which represents the positive difference between the cost and the fair value of the assets and liabilities of an acquired company at the purchase date.

Recognition criteria: intangible assets are recorded at cost, adjusted for any related charges only if it is probable that the future economic benefits attributable to the assets will materialise and if the cost of the asset can be reliably determined.

The cost of intangible assets is otherwise posted to the income statement in the reporting period it was incurred.

Goodwill is posted among assets when it results from acquisitions of businesses in accordance with the principles of determination indicated by IFRS 3, when the residual surplus between the overall cost incurred for the transaction and the net fair value of the assets and liabilities acquired comprising companies or divisions represents their future income capacity.

Intangible assets with finite useful life include investments in software, surface rights relating to the land where the Company's Branch no. 13 of Asti is located, those representing customer relationships, comprising the valuation, on the acquisition of the division, of asset management and assets under custody accounts, core deposits and core overdrafts, fixed assets in progress and expenses for the renovation of third party assets.

Measurement criteria and revenue recognition criteria: following initial recognition, intangible assets with finite useful life are recognised at cost, net of the total amount of amortisation and cumulative impairment.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Amortisation is carried out on a straight-line basis, which reflects the long-term use of the asset, based on the estimated useful life.

At each reporting date, it is tested whether the intangible asset can effectively still be used and that the company still intends to use it for the period of time from the reporting date to the date originally planned for the end of its use.

Where the recoverable amount is lower than the carrying amount, the amount of the loss is recognised in the income statement.

The goodwill recognised is not subject to amortisation, but its carrying amount is subject to impairment testing annually or more frequently, when there are signs of impairment. The amount of the impairment loss is determined by the difference between the carrying amount and its recoverable amount, if lower, and is posted to the income statement. The recoverable amount is understood as the higher of the cash generating unit's fair value, less costs to sell, and its value in use. Value in use is the present value of future cash flows expected to arise from the years of operation of the cash generating unit and its disposal at the end of its useful life. The recognition of any subsequent recoveries is not permitted.

Derecognition criteria: intangible assets are derecognised from the balance sheet at the time of sale, or when no future economic benefits are expected. Capital gains and losses deriving from the disposal or sale of intangible assets are calculated as the difference between the net sale price and the carrying amount of the asset.

Classification criteria: individual non-current assets (tangible, intangible and financial) or groups of assets held for sale are classified under this item, with the related associated liabilities, as regulated by IFRS 5.

**8 - Non-current
assets held for sale
and discontinued
operations**

These are assets or groups of assets for which a divestment process has been initiated and their sale is considered highly probable. These assets are valued at the lower of their book value and their fair value less costs to sell, with the exception of certain types of assets (e.g. financial assets falling within the scope of application of IFRS 9) for which IFRS 5 specifically provides that the measurement criteria of the relevant accounting standard must be applied.

Non-current assets and discontinued operations may include portfolios of assets for which there are no listings in an active market. In this case, they are measured at fair value by referring, in the presence of an agreement reached with the acquiring counterpart, to the sale prices resulting from this agreement; in the absence of an agreement, applying specific valuation techniques based on the asset and, if necessary, making use of external fairness opinions.

Income and charges (net of the tax effect), attributable to discontinued operations or recognised as such during the reporting period, are shown in the income statement in a separate item.

Income taxes are comprised of the balance of current and deferred taxes. These are recorded as costs on an accruals basis, in line with the method of recording of costs and revenues that generated them in the financial statements.

**9 - Current
and deferred
tax**



Current tax

“Current tax assets and liabilities” are recognised at the value payable or recoverable for tax profits (losses), applying the tax rates and tax regulations in force regarding income taxes. Effectively, these are taxes that are expected to be reported on the tax returns.

Current tax that has not yet been fully or partially paid at the reporting date is included under “Current tax liabilities” in the balance sheet. In the event of excess payments that gave rise to a recoverable credit, such credit is recorded under “Current tax assets” in the balance sheet.

The parent company Cassa di Risparmio di Asti S.p.A. and the companies Pitagora S.p.A. and Immobiliare Maristella S.r.l., part of the Cassa di Risparmio di Asti Group, renewed the option to adopt the 'Domestic Tax Consolidation' also for 2020. This regime is governed by Articles 117-129 of the Consolidated Income Tax Act, introduced into tax law by Italian Legislative Decree 344/2003.

Under that regime, the subsidiaries transfer their taxable income (or tax loss) to the parent company, which determines a single taxable income of the Group, as the algebraic sum of the income and/or losses of the single companies, recording a single tax liability/credit due to/from the Tax Authorities.

Deferred tax

The differences between taxable income and statutory income can be permanent or temporary.

Permanent differences are definitive and are comprised of revenues or costs which are completely or partially exempt or non-deductible pursuant to tax law.

The temporary differences, instead, only trigger a timing difference which results in moving up or deferring the moment of taxation in relation to the period of accrual, resulting in a difference between the carrying amount of an asset or liability in the balance sheet and its value recognised for tax purposes. Those differences break down into “deductible temporary differences” and “taxable temporary differences”.

“Deductible temporary differences” indicate a future reduction in taxable income, which therefore generates “deferred tax assets”, as these differences give rise to a taxable amount in the reporting period in which they are recognised, determining a prepayment of taxes in relation to their economic and statutory accrual. In substance, the temporary differences generate tax assets, as they will result in lower taxes in the future, provided that in the following years enough taxable profits are earned to cover the realisation of the taxes paid in advance.

“Deferred tax assets” are recognised for all deductible temporary differences if it is likely that taxable income will be earned, against which the deductible temporary differences can be used.

The origin of the difference between the higher taxable income than statutory income is mainly due to:

- positive income components taxed in years other than those in which they were recognised;
- negative income components that are tax deductible in years following the year of recognition.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

“Taxable temporary differences” indicate a future increase in taxable income and, as a result, generate “deferred tax liabilities”, as these differences give rise to a taxable amount in the years following those in which they are posted to the statutory income statement, resulting in a deferral of taxation in relation to its economic and statutory accrual. In substance, the temporary differences generate tax liabilities, as they will result in higher taxes in the future.

“Deferred tax liabilities” are recognised for all taxable temporary differences, with the exception of untaxed reserves charged to capital or for which no distribution to shareholders is planned.

The origin of the difference between the lower taxable income than statutory income is due to:

- positive income components taxable in years following that in which they were recognised;
- negative income components deductible in years prior to that in which they will be posted according to statutory criteria.

Deferred tax assets and liabilities are recorded using the “balance sheet liability method”, based on the temporary differences arising between the carrying amount of assets and liabilities in the balance sheet and their value recognised for tax purposes, and are calculated using the tax rates which, based on the laws in force at the reporting date, shall be applied in the reporting period in which the asset will be realised or the liability extinguished.

In the event that different tax rates are to be applied to different income levels, deferred tax assets and liabilities are calculated using the average weighted tax rate for the reporting period to which the Consolidated Accounting Statements refer.

Deferred tax assets and liabilities are offset when they are due to the same tax authority and when the right to offsetting is recognised by law.

If the deferred tax assets and liabilities relate to items that have affected the income statement, the offsetting entry is represented by income taxes.

“Provisions for risks and charges” include provisions relative to long-term benefits and employee benefits following termination of the employment contract as described by IAS 19, in addition to the provisions for risks and charges described by IAS 37.

**10 - Provisions
for
risks and
charges**

Pension funds and similar obligations

Pension funds are set up to implement company agreements and qualify as defined benefit plans.

Defined contribution plans are benefit plans following the termination of employment, based on which the company pays contributions fixed on the basis of a contract to an external fund and, as a result, has no legal or implied obligation to pay amounts in addition to the payment of the contribution where the fund has insufficient assets to pay all benefits to employees. The contribution is recorded on an accruals basis among personnel expenses, as a cost relating to employee benefits.

The structure of defined benefit plans differs significantly, even though they are established in the form of an external fund with legal personality, for which the



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Group guarantees payment of the benefits to the entitled parties, assuming the actuarial risk.

Those plans fall within the scope of the sub-item “Post-retirement benefit obligations”. In this case, the benefits that must be paid in the future were valued by an external actuary using the “projected unit credit method”.

Provisions for risks and charges against commitments and guarantees given

The sub-item of provisions for risks and charges includes provisions for credit risk recognised in relation to commitments to disburse funds and guarantees given, which fall within the scope of application of the rules on impairment pursuant to IFRS 9. For these cases, in principle, the same allocation methods are adopted between the three stages (credit risk stages) and calculation of the expected loss with reference to financial assets measured at amortised cost or measured at fair value through other comprehensive income.

Other provisions

Provisions for risks and charges are liabilities of uncertain amounts or expiry recognised when the following simultaneous conditions occur:

- there is a current obligation at the reporting date of the Consolidated Accounting Statements which derives from a past event; said obligation must be of a legal nature (contained within a contract, regulation or other legal provision) or implicit (arises at the moment in which the company generates the expectation by third parties that it will meet its commitments, even if these do not fall under legal obligations);
- a financial disbursement is likely;
- a reliable estimate of the amount of the obligation can be determined.

The allocations for long-term benefits refer to seniority bonuses to be paid to employees on reaching their twenty fifth and thirtieth year of service, and are recognised in the sub-item “Other provisions”. Those benefits are accounted for based on an actuarial method set out in IAS 19, highly similar to that described below for post-employment benefits.

The sub-item “Other provisions” also recognises allocations for expected losses for actions filed against the Bank, including clawback actions and other outlays estimated in relation to legal obligations existing at the date of preparation of the Consolidated Accounting Statements.

If the deferral over time of the payment of the charge is considerable and, as a result, the discounting effect is significant the provisions are determined by discounting the charges that are assumed will be necessary to pay off the obligation, at a discount rate, before taxes, that reflects the current market valuations of the present value of money and the specific risks connected with the liability.

Following the discounting process, the amount of provisions posted in the Consolidated Accounting Statements increases each reporting period to reflect the



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

passing of time. That increase is recognised under “Net allocations to provisions for risks and charges”.

At each reporting date, provisions are adjusted to reflect the best current estimate. If the reasons for the allocations made no longer apply, the related amount is reversed.

Provision for employee severance pay

The employee severance pay is a type of remuneration of personnel, with payment deferred to after termination of employment.

This accrues in proportion to the duration of the employment, constituting an additional element of personnel expenses.

Because the payment is certain, but not the moment at which it will occur, the provision for employee severance pay, equal to defined benefit pension plans, is classified as a post-employment benefit. As a result, the liability already accrued at the closing date of the Consolidated Accounting Statements must be projected to estimate the amount to be paid at the time of termination of employment and then discounted to take account of the time that will pass before the actual payment.

The method used to determine the present value of the liability is the projected unit credit method, also known as the method of accrued benefits in proportion to the work performed or the method of benefits/years of work, which considers each period of service provided by workers to the company as the origin of an additional unit of rights to the benefits, and separately measures each unit to calculate the final obligation.

That method entails the prediction of future disbursements on the basis of statistical historical analysis and the demographic curve, and the financial discounting of such flows according to market interest rates.

The amount recorded as a liability thus equals the present value of the liability at the reporting date, plus the annual interest accrued on the present value of the commitments of the Group at the beginning of the year, calculated using the discount rate for future outlays adopted to estimate the liability at the end of the previous year, and adjusted by the share of actuarial gains/losses. Actuarial gains and losses are posted as an offsetting entry in a shareholders' equity reserve, and are represented in the “Statement of consolidated comprehensive income”.

The obligations are assessed on a regular basis by an independent actuary.

Classification criteria: this item includes payables, in the various forms of funding (deposits, current accounts and loans) due to banks, due to customers and debt securities issued.

These include operating payables other than those connected with payment for the supplies of non-financial goods and services, attributable to the item “Other liabilities”.

Debt securities in issue include unlisted debt securities issued (including certificates of deposit), net of repurchased securities.

These include securities which matured by the reporting date, but have not yet been redeemed. These exclude the share of own debt securities issued not yet placed with third parties.

11 - Financial liabilities measured at amortised cost



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Recognition criteria: these are initially recognised upon receipt of the amounts collected or at the time of issuance of debt securities based on the fair value of the liability, which is generally equal to the amount received or the issue price, adjusted by any additional income/expense directly attributable to the individual funding or issuing transaction.

The item includes liabilities for assets sold and not derecognised connected with the securitisation transaction, net of the debt securities issued by the vehicle and repurchased by the Group.

Measurement criteria and revenue recognition criteria: following initial recognition, financial liabilities are measured at amortised cost, using the effective interest rate method. For short-term liabilities, amortised cost is not generally used, given the irrelevance of the effects of applying that criterion.

The cost of interest on debt instruments is classified under “Interest expense and similar charges”.

Derecognition criteria: financial liabilities are derecognised when the obligation specified in the contract is fulfilled.

Repurchases of the Bank’s own liabilities are considered similar to the settlement of a liability or part thereof. The difference between the carrying amount of the liabilities settled and the amount paid to repurchase them is booked in the income statement.

In the event of repurchase of previously issued securities, the related items under assets and liabilities are netted in the accounts.

For accounting purposes, any subsequent sale of repurchased securities in issue is considered as a new issue, posted at the new re-placement price, without any effects on the income statement.

12 - Financial liabilities held for trading

Classification criteria: this category includes the negative value of derivative contracts, including operational hedging derivatives linked to financial instruments for which the fair value option was exercised.

Measurement criteria and revenue recognition criteria: all trading liabilities are measured at fair value, determined as specified in section “A.4- Information on fair value”, allocating the result of the valuation to the income statement.

Derecognition criteria: financial liabilities held for trading are derecognised when the obligation specified in the contract is fulfilled.

13 - Financial liabilities measured at fair value

Classification criteria: financial liabilities with the characteristics set out in the fair value option are classified in this category.

In particular, based on the FVO, financial liabilities may be measured at fair value through profit or loss in cases of:



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

- elimination or reduction of inconsistencies in valuation, to ensure a more reliable presentation of information;
- valuation of financial instruments containing embedded derivatives;
- valuation of groups of financial assets or liabilities based on documented risk management or investment strategy.

In line with these indications, this category includes:

- financial liabilities subject to “natural hedging” through derivative instruments;
- bonds issued with embedded derivatives.

Recognition criteria: financial liabilities are initially recognised on the date of issuance for debt securities. Financial liabilities measured at fair value are recorded at fair value on initial recognition, which generally equals the consideration received.

Measurement criteria and revenue recognition criteria: following initial recognition, financial liabilities are aligned with their fair value. Considering that the Group does not have financial liabilities listed on active markets, the determination of the fair value is based on models that discount future cash flows or option valuation models.

Gains and losses realised on redemption and unrealised gains and losses deriving from changes in fair value in relation to the issue price are charged to the income statement for the period in which they arise, under the item “Net profit (loss) from financial assets and liabilities measured at fair value”.

The Group opted to designate structured or fixed-rate bonds issued at fair value. Based on the provisions of IFRS 13, the fair value of those liabilities must reflect the creditworthiness of the issuer. Based on the analyses conducted, the Group decided that it could quantify its creditworthiness by referring to the yields recorded on unsecured senior issues of Italian banks with ratings of BBB+, BBB and BBB-, using the specific curve provided by the info-provider Bloomberg (or another equivalent curve, lacking this one).

According to the provisions of IFRS 9:

- changes in fair value that are attributable to changes in creditworthiness must be recognised in the statement of comprehensive income;
- the remaining changes in fair value must be recorded in the income statement.

The cost of interest on debt instruments is classified under interest expense and similar charges.

Derecognition criteria: financial liabilities designated at fair value are derecognised when the obligation specified in the contract is fulfilled.

Repurchases of the Bank’s own liabilities are considered similar to the settlement of a liability or part thereof. The difference between the carrying amount of the liabilities and the amount paid to repurchase them is booked in the income statement.

In the event of repurchase of previously issued securities, the related items under assets and liabilities are netted in the accounts.



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

For accounting purposes, any subsequent sale of repurchased securities in issue is considered as a new issue, posted at the new re-placement price, without any effects on the income statement.

14 – Foreign currency transactions **Classification criteria:** in addition to those explicitly denominated in a currency other than Euro, assets and liabilities in foreign currency include those that envisage financial indexing clauses linked to the Euro exchange rate with a specific currency or specific basket of currencies.

For the purposes of the translation method to be used, assets and liabilities in foreign currency are broken down into monetary and non-monetary items.

Monetary items consist of cash held and assets and liabilities to be received or paid, in fixed or determinable amounts of money. Non-monetary items lack the right to receive or an obligation to deliver a fixed or determinable amount of money.

Recognition criteria: upon initial recognition, foreign currency transactions are recognised in the currency of account using the foreign exchange rates on the date of the transaction.

Measurement criteria and revenue recognition criteria: at each closing date, elements originally denominated in foreign currency are valued as follows:

- monetary items are converted using the exchange rate on the period closing date;
- non-monetary items valued at historical cost are translated using the exchange rate in force on the date of initial recognition;
- non-monetary items measured at fair value are translated at the exchange rate in force at the time the fair value was calculated.

Foreign exchange differences generated on monetary items from the transaction date to the date of the related payment are recorded in the income statement in the reporting period they arise, as well as those that derive from the translation of monetary items at exchange rates different from the initial translation exchange rates, or from translation at the previous closing date.

IFRS 16 - Leases

15 – Other information

The accounting standard IFRS 16 – Leases replaced IAS 17, as well as the interpretations IFRIC 4, SIC 15 and SIC 27, starting from 1 January 2019, introducing new rules for the accounting recognition of leases, both for lessors and for lessees.

IFRS 16 establishes principles for the recognition, valuation, presentation of and additional disclosure on leases. The objective is to ensure that lessees and lessors provide appropriate information in a manner that accurately represents the transactions, in order to provide elements to assess the effect of the lease on the balance sheet, income statement results and cash flows of the entity. The standard provided a new definition of lease and introduced an approach based on control (right of use) of an asset to distinguish lease agreements from service agreements,



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

identifying as discriminating factors: the identification of the asset, the right to replace it, the right to substantially obtain all economic benefits originating from the use of the asset and the right to direct the use of the asset underlying the agreement. The lessee must recognise a liability based on the present value of future lease payments as an offsetting entry to the recognition of the right-of-use asset pertaining to the lease contract under assets. Following initial recognition, the right of use shall be amortised over the duration of the contract or the useful life of the asset (based on IAS 16) or measured using an alternative criterion – fair value – (IAS 16 or IAS 40). The liability will be gradually decreased due to payment of the lease rentals and interest shall be recognised on such payments, to be posted to the income statement. With regard to the first-time adoption of IFRS 16 (in 2019), the Group opted to apply the modified retrospective approach - option B - to calculate the lease liability as the present value of future lease payments, and determining the associated right of use based on the value of such liability. Based on the options exercised, there were no impacts on shareholders' equity, as the values of the right of use and the associated liabilities recognised in the accounts match. The standard permits the recognition of the cumulative effect of application of the new standard at the date of first-time adoption, without restating the comparative information. In calculating the amounts under IFRS 16, as permitted by the standard, contracts concerning low-value assets were excluded, as well as leases with a duration equal to or less than 12 months. For the purpose of identifying low-value assets, the Group set € 5,000 (low value) as the limit under which the new standard shall not apply. The share of VAT on lease payments is not considered as a lease component and, as a result, was treated in line with the accounting rules in force prior to IFRS 16.

As regards the interest rate to be used to discount the liability, the Group uses the interest rate referring to the yield curve for senior bank bonds rated BBB+, BBB and BBB- denominated in Euro. In addition to the fact that it can be easily obtained and is updated daily, that curve appropriately represents the interest rate at which the Group should hypothetically issue any senior bonds on the market. The interest rate is redetermined annually, and the new interest rate is applied to new contracts or expired contracts that are renewed. For contracts in force, the lease payments are discounted at the rate originally applied.

The main impacts in the Group are attributable to the right of use for the lease of properties, through rental contracts. The scope of application of the standard includes property leases as well as automobile leases.

The Group has no sub-leases.

For lessors, the accounting rules for lease agreements set out in IAS 17 are substantially confirmed, differentiated depending on whether they are operating leases or finance leases. For finance leases, the lessor will continue to recognise a receivable for future lease payments in the balance sheet.

Targeted Longer-Term Refinancing Operations – TLTRO III

TLTRO III - Targeted Longer Term Refinancing Operations - were introduced for the first time in 2014, carried out by the European Central Bank with the aim of



maintaining favourable loan conditions in the Eurozone and stimulating the disbursement of bank credit.

For the Group, as at 30 September 2024, the funding operations from the ECB consisting of TLTRO III loans were all fully repaid.

Taking into account the various mechanisms envisaged by the transaction regulations, in the Consolidated Accounting Statements as at 31 December 2024, the portion of interest collected and pertaining to the period was recognised under item “20. Interest expense and similar charges” and amounted to € 4.7 million.

Sale to Iccrea of a stake in Pitagora

On 31 May 2021, Banca di Asti formalised an agreement relating to the purchase by Iccrea Banca of a stake equal to 9.9% of the share capital of Pitagora S.p.A. (Pitagora) held by Banca di Asti, Bonino 1934 and some minority shareholders.

The transaction is part of the broader long-term commercial partnership agreement signed on 23 December 2020, and operational from the first months of 2021, between Pitagora and BCC Credito Consumo S.p.A., a company of the Iccrea Group specialised in offering dedicated customised loans to households, aimed at distributing Pitagora salary/pension-backed loans through the network of branches of the BCCs belonging to the Iccrea Group.

The completion of the transaction was subject to the usual conditions precedent, including the issue by the Bank of Italy of the necessary approvals and/or authorisations. Following the completion of the transaction, the Bank sold 7% of the capital held in Pitagora to Iccrea, repositioning its stake to 63% of the share capital of the same. In 2021, the sale, which took place for a consideration of € 7.7 million, generated a capital gain of € 3.9 million.

A shareholders' agreement was also signed between Banca di Asti, Bonino and Iccrea Banca concerning, among other things, the representation of Iccrea Banca within the Board of Directors of Pitagora and the attribution to Iccrea Banca of certain qualified minority interest rights as well as the right to increase its shareholding up to 20% by exercising a purchase option vis-à-vis Banca di Asti and Bonino. The agreement also provides, upon the occurrence of certain conditions, for the right of Iccrea to sell to Banca di Asti e Bonino 1934 its equity investment held from time to time and, on the other hand, the right of Banca di Asti and of Bonino 1934 to purchase the equity investment held by Iccrea from time to time.

In this regard, on 19 March 2024, Iccrea Banca exercised the option to purchase an incremental shareholding up to 20% of the share capital of Pitagora and submitted an application to the Supervisory Authority pursuant to Articles 19 and 110 of Italian Legislative Decree 385/1993 (Consolidated Banking Act - TUB). The authorisation was issued by means of a provision of the Bank of Italy of 9 October 2024 (prot. no. 1974893/24). The transaction was finalised in the fourth quarter of 2024 with the sale by the Bank to Iccrea of 6.5% of the capital held in Pitagora: this operation generated an individual capital gain of € 3.6 million. The Bank's equity investment in the share capital of Pitagora as at 31 December 2024 was 56.5%; that of Iccrea is 20%.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

The strategic partnership will allow the Iccrea Group to enrich its operations in the consumer credit sector with a partner specialised in salary/pension-backed loans, as part of the broader process aimed at strengthening the offer by the BCCs to meet the needs of shareholders and retail customers.

Additional Tier 1 instruments

In 2020, Banca di Asti issued an Additional Tier 1 (AT1) capital instrument, targeting institutional investors, for a total of € 100 million. The transaction was part of the Bank's capital structure management.

These are perpetual securities (with maturity linked to the Bank's statutory duration) and an option for early redemption is provided, the exercise of which is subject to meeting applicable regulatory requirements, in the period 27 November 2025 to 27 May 2026, and on every coupon payment date thereafter.

The coupon is half-yearly, not cumulative and, in reference to the first 5.5 years of the security, is fixed at 9.25%. Thereafter, if the early redemption option is not exercised, it can be reviewed at 5-year intervals based on the swap rate with the same maturity at that time, plus the original spread.

The payment of coupons is discretionary and subject to certain limitations. The 5.125% trigger on Common Equity Tier 1 (CET1) envisages that, if the CET1 ratio of the Group or the Bank falls below this limit, the nominal value of the securities will temporarily drop by the amount required to restore the level, also taking into account other instruments with similar characteristics and the same level of subordination.

The security is listed on the multilateral trading facility of the Dublin Stock Exchange (Global Exchange Market – not regulated under Directive 214/65/EU).

Based on the loan characteristics, the issue can be classified as an equity instrument pursuant to IAS 32. In line with the nature of the instrument, the coupons were recognised as a decrease in item 140 Reserves under shareholders' equity, net of tax effect.

The consideration collected from the issue is represented in shareholders' equity item '130. Equity instruments' for a total of € 97,567 thousand, less transaction costs directly attributable to the issue which, net of tax effect, totalled € 2,433 thousand. Considering payment of the current coupon to be highly probable as at 30 September 2024, in order to decrease the reserves an accrual for the period of € 630 thousand was recognised, net of tax effects.

Transfer by contribution of the acquiring business branch

On 28 December 2023, Banca di Asti finalised the transfer by contribution of its merchant acquiring activities to BCC Pay S.p.A. in accordance with the framework agreement of 24 October 2023. The closing took place after obtaining the necessary authorisations from the Bank of Italy and has enabled the valuation of the Bank's commercial assets, freeing up resources for further capital strengthening. The transaction took the form of the transfer by contribution of the e-money business through the contribution of the relevant business branch to the company BCC Pay of



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

the Pay Holding Group. The branch consisted of assets functional to the operation of the business, a legal employment relationship, liabilities inherent in the employment relationship and merchant acquiring contracts as well as related service contracts. According to the contractual framework of the transaction, against the subscription of the capital increase of BCC Pay S.p.A., the Bank in December 2023 made the transfer by contribution of the merchant acquiring business branch. Subsequently, in January 2024, the company PayCo Holding S.p.A. purchased the newly subscription of BCC Pay shares from the Bank for an agreed fixed consideration of € 37 million. By virtue of further consideration, the framework agreement provides that Pay Holding S.p.A shall pay two variable components upon the occurrence of two conditions of a prospective nature, tied to certain economic and qualitative targets that will be assessed one year from the date of closing.

The transaction enabled the Bank to record a capital gain of approximately € 37 million in 2023, recognised under item 200 “Other operating expenses/income”.

Banca di Asti also launched a commercial partnership for the promotion and the placement in favour of its customers of the acquiring products of BCC Pay, now Numia S.p.A., signing with the latter a ten-year distribution agreement, renewable, with an exclusivity constraint.

Pursuant to the framework agreement of 24 October 2023, during the third quarter of 2024, having reached and exceeded the migration rate threshold, the Bank received the earn-out payment of € 5 million to which it was entitled. This is the variable portion of the consideration, agreed in the Framework Agreement, subject to the achievement of a migration rate of 90% of the renegotiations of the merchant acquiring relationships. The second variable component provided for by the Framework Agreement is linked to the achievement of a 100% transaction margin ratio to be verified at the end of the 2026 financial year.

Tax credits associated with the 'Cura Italia' and 'Rilancio' Italian Law Decrees, purchased as a result of disposal by the direct beneficiaries or previous buyers

The Italian Law Decrees 18/2020 (the so-called 'Cura Italia') and 34/2020 (the so-called 'Rilancio') have introduced in the Italian legal system tax incentive measures connected with both investment spending (e.g. Ecobonus and Sismabonus) and with current expenses (e.g. rents for non-residential premises).

These tax incentives that apply to households or businesses, commensurate to a percentage of the expense incurred (which in some cases can even reach 110%) are disbursed in the form of tax credits or tax deductions (with the option of transforming these into tax credits). For the Ecobonus and Sismabonus, in addition to other incentives for building works, it is also possible to make use of the incentive as a discount on the consideration due to the supplier, to whom a tax credit will be recognised. Most of the tax credits from these incentives can be transferred to third-party buyers, who can use them according to the special rules envisaged. Specifically, the holders of these credits can use them to offset taxes and contributions, in accordance with the same rules as for the original beneficiary, or can again sell all or part of them to third parties.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

In the second half of 2020, the Bank launched the "Ecobonus" project, through which retail and business customers can use a new service that follows them through energy or seismic requalification works on their owned properties, without any upfront outlay. The financial support is provided through the opening of a current account credit facility designed to cover all the requalification costs up to the finalised transfer of the tax credit to our Bank. In 2024, the Group purchased tax credits from customers for a nominal amount of € 84.2 million; net of the transfers made, the acquired receivables are within the limit of the taxable amount that can be offset.

The specific characteristics of the purchased tax credits do not allow this case to be traced back to any IAS/IFRS accounting standard. Therefore, in application of IAS 8, the company management has defined an accounting policy to ensure a faithful representation of the financial and income position and cash flows that reflects the economic substance of the transaction. In line with the guidelines provided in the joint Bank of Italy/Consob/Ivass Document 9 called "Accounting treatment of tax credits connected with the 'Cura Italia' and 'Rilancio' Italian Law Decrees acquired following the sale by direct beneficiaries or previous purchasers" and with the IAS and IFRS accounting standards where applicable, the credits fall under the HTC business model when held to offset cash flows or HTCS when held both for cash flow offsetting and for sale, and are recognised in accordance with IFRS 9 at their fair value corresponding to the purchase price (fair value level 3) on initial recognition. In the case of the HTC business model, the subsequent measurement is carried out at amortised cost; in the case of the HTCS business model, the subsequent measurement is at fair value. Subsequent measurements that envisage the amortised cost method provide recognition of interest in item 10 "Interest income and similar revenues". For receivables included in the HTCS business model, the recognition takes place at the amount paid, accounted for according to the amortised cost criterion and subsequently measured at fair value. The effects of the change in fair value are recognised in a specific equity reserve until the loan is derecognised. Receivables are classified under asset item 120 "Other assets".

Extraordinary tax pursuant to Italian Law Decree 104/2023.

Italian Law Decree 104 of 10 August 2023 introduced an extraordinary tax on the interest margin of banks. With Italian Law 136 of 9 October 2023, the Law Decree was converted into law with amendments.

The provision stipulates that the tax on banks' extra-profits is calculated by applying a rate of 40% on the amount of the interest margin included in item 30 of the Income Statement prepared in accordance with the formats approved by the Bank of Italy for the financial year prior to the year in progress on 1 January 2024 that exceeds the same margin by at least 10% in the financial year prior to the year in progress on 1 January 2022. The amount of the extraordinary tax, in any event, may not exceed 0.26% of the total amount of risk exposure on an individual basis, determined in accordance with paragraphs 3 and 4 of Article 92 of EU Regulation 575/2013 of the European Parliament and of the Council of 26 June 2013, by reference to the closing date of the financial year preceding that in progress on 1 January 2023.



The extraordinary tax, which will be paid in 2024, will not be deductible for IRES and IRAP purposes.

The conversion of the Decree also introduced the right, in lieu of payment of the tax, to allocate, upon approval of the 2023 financial statements, an amount not less than 2.5 times the amount of the tax itself to a non-distributable reserve that meets the conditions set forth in EU Regulation 575/2013 for eligibility as elements of Common equity Tier 1 (CET1) capital. The said reserve must be usable without restriction and without delay by the entity to cover risks or losses when such risks or losses occur. If the reserve is used in the future for the distribution of the profit, the Bank will have to pay the amount due for the tax plus the interest accrued in the meantime, within 30 days of the approval of the resolution for its use.

In this regard the Bank availed itself of the right provided for by Article 26 (5 bis) of Italian Law 136/2023, proposing to the Shareholders' Meeting at the time of approval of the 2023 financial statements the establishment of a non-distributable reserve in lieu of payment of the extraordinary tax. The amount of the allocation to the reserve by the Bank came to € 36.2 million.

Classification criteria for financial assets - IFRS 9

Accounting standard IFRS 9 requires the use of two guidelines for classifying financial assets:

- the business model used by the company, i.e. the operational purposes for which the company intends to hold the financial asset;
- the contractual characteristics of the cash flows generated by financial assets.

The combination of the two elements mentioned above derives from the classification of the financial assets, which occurs at the time the financial assets are generated or acquired, according to the following:

- financial assets measured at amortised cost: assets that pass the SPPI test and fall under the Hold to Collect business model (HTC);
- financial assets measured at fair value through other comprehensive income (FVOCI): assets that pass the SPPI test (for debt securities issued and loans) and fall under the Hold to Collect and Sell business model (HTCS);
- financial assets measured at fair value through profit or loss (FVTPL): a residual category, which includes financial instruments that cannot be classified in the previous categories based on the results of the business model test or the test on the characteristics of contractual cash flows (SPPI test failed).

Business model

With regard to the business model, IFRS 9 identifies three cases in relation to the methods by which cash flows are managed and financial assets are sold:

- *hold to collect*, which includes financial assets for which the Group's purpose is to hold them to maturity, in order to periodically collect the contractual cash flows represented by the principal and interest amounts;



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

- *hold to collect and sell*, whose objective is pursued both by collecting the contractual cash flows and selling the financial assets. Both activities (collection of contractual cash flows and sales) are essential for achieving the business model's objective. Therefore, sales are more frequent and for greater amounts than an HTC business model and are an essential component of the strategies pursued;
- *other*, is a residual category that includes both financial assets held for trading purposes and financial assets managed with a business model other than the previous categories (Hold to Collect and Hold to Collect and Sell), resulting in changes being measured at fair value through profit or loss.

The business model reflects the methods by which financial assets are managed to generate cash flows for the entity's benefit and is defined by top management through the appropriate involvement of business structures.

It is determined by considering the ways in which financial assets are managed and, as a consequence, the extent to which the portfolio's cash flows derive from the collection of contractual cash flows, from the sale of financial assets, or from both of these events. The assessment is not made using scenarios that, based on the entity's reasonable expectations, are not likely to occur, such as the "worst case" or "stress case" scenarios. For example, if the entity plans to sell a certain portfolio of financial assets only in a "stress case" scenario, this scenario does not affect the assessment of the entity's business model for these assets, if said scenario is not likely to occur based on the entity's reasonable forecasts.

The business model does not depend on the intentions that management has for an individual financial instrument, but refers to the ways in which groups of financial assets are managed for the purpose of achieving a specific business objective.

Thus, the business model:

- reflects the methods by which financial assets are managed to generate cash flows;
- is defined by top management through the appropriate involvement of business structures;
- must be determined by considering the methods by which financial assets are managed.

In operational terms, the business model is assessed in line with the company organisation, the specialisation of the business functions and the assignment of delegated powers (limits).

When assessing a business model, all relevant factors available at the assessment date are used. These factors include the strategy, risks and their management, remuneration policies, reporting, and the amount of sales. In analysing the business model, it is crucial that the factors evaluated are consistent amongst themselves and, in particular, are consistent with the strategy pursued. With the view to the significant purpose of drawing up the Consolidated Accounting Statements, a consolidated business model was identified that represents the methods with which the Group, understood as a single economic entity, intends to realise the cash flows from the financial assets.



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

In that regard, and in relation to the operational purposes for which the financial assets are held, a specific document “C.R. Asti Group – Analysis and determination of the individual and consolidated business models for the purposes of IFRS 9 classification” – approved by the Board of Directors – defines and outlines the elements comprising the business model for financial assets included in the portfolios managed in carrying out operations on business structures for the Cassa di Risparmio di Asti Group.

With specific regard to salary/pension-backed loans, where, at the disbursement date, the Group does not possess information regarding the expected methods of realising the cash flows, it classifies those loans as HTCS with measurement at fair value through other comprehensive income (FVOCI).

Conversely, with regard to the same type of loans, if, at the disbursement date, the Group is aware of the method of realising the cash flows, it makes the following classification:

- the loans that the Group designates from the origin to be held by the Group to realise the cash flows by collecting the interest and principal on maturity will be included in the category HTC and measured at amortised cost;
- the loans that the Group designates from the origin to be sold outside the Group to realise the cash flows through their sale are classified in the “others” business model and measured at fair value through profit or loss.

For Hold to Collect portfolios, the Group has defined eligibility thresholds for sales that do not affect the classification (frequent but not significant, individually and in the aggregate, or infrequent even though they are of a significant amount) and, at the same time, the parameters have been established to identify sales consistent with this business model, when they are attributable to an increase in credit risk.

SPPI and Benchmark tests

The appropriate classification of financial instruments held first requires that the business model intended to be used be analysed, as indicated above, and subsequently the characteristics of the contractual cash flows deriving from the asset be verified. The latter verification is defined through two specific tests:

- the Solely Payment of Principal and Interest – SPPI Test;
- the Benchmark test.

So that a financial asset may be classified at amortised cost or at FVOCI, in addition to the analysis of the business model, it is necessary that the contractual terms of the asset envisage, at specific dates, cash flows that are solely payment of principal and interest on the amount of principal to be repaid (SPPI). That analysis must specifically be conducted for loans and debt securities.

The SPPI test must be conducted on each single financial instrument at the time of recognition. Following initial recognition, and as long as it is recognised, the asset will no longer be subject to new SPPI tests. Where a financial instrument is derecognised from the accounts and a new financial asset is recognised, the SPPI test must be conducted on the new asset.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

For the purposes of applying the SPPI test, IFRS 9 provides the following definitions:

- principal: the fair value of the financial assets on initial recognition. That value may change over the life of a financial instrument, for example, as a result of repayments of principal;
- interest: the consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time.

In assessing whether the contractual flows of a financial asset may be defined as SPPI, IFRS 9 refers to the general concept of “basic lending arrangement”, which is independent from the legal form of the asset. Where the contractual clauses introduce the exposure to the risk or volatility of contractual cash flows that is inconsistent with the definition of basic lending arrangement, such as exposure to changes in the prices of shares or commodities, the contractual flows do not meet the definition of SPPI.

In the event that the time value of money is modified (“modified time value of money”) - for example, when the financial asset’s interest rate is periodically reset but the frequency of that reset or the frequency of the payment of coupons does not reflect the tenor of the interest rate (for example, the interest rate resets every month based on a six-month rate) or when the interest rate is reset periodically based on an average of particular short-term or medium/long-term rates - the entity must assess, using both quantitative and qualitative elements, whether the contractual flows still meet the definition of SPPI (benchmark cash flows test). Where the test shows that the (non-discounted) contractual cash flows are “significantly different” from the (also non-discounted) cash flows of a benchmark instrument (i.e. without a modified time value), the contractual cash flows cannot be considered as meeting the definition of SPPI.

In addition, any contractual clauses that could change the frequency or amount of contractual cash flows must be considered in order to assess whether such cash flows meet the SPPI requirements (e.g., prepayment options, possibility to defer the contractually agreed cash flows, instruments with embedded derivatives, subordinated instruments, etc.).

However, as required by IFRS 9, a single element of contractual cash flows does not affect the classification of the financial asset if it has only a minimal effect on the contractual cash flows of the financial asset (in each year and cumulatively). Similarly, if an element of cash flows is not realistic or genuine, i.e., if it affects the instrument’s contractual cash flows only at the occurrence of an extremely rare, highly unusual, and very unlikely event, it does not affect the classification of the financial asset.

In relation to the SPPI test and the Benchmark test, the Group subscribed to the offer of the info-provider Prometeia: on a daily basis, the Group inputs the flows to be sent to the info-provider, which returns the results of the two tests with the same frequency.

Method for determining impairment

Impairment of financial assets



PART A
ACCOUNTING
POLICIES

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Pursuant to IFRS 9, at each reporting date, financial instruments classified under:

- financial assets measured at fair value through other comprehensive income;
- financial assets measured at amortised cost;
- commitments to disburse funds and guarantees given;

are tested to verify whether there is evidence of an increase in credit risk and to determine any impairment.

The model classifies financial assets into three stages, each of which corresponds to a different level of risk and specific methods for calculating value adjustments.

- *Stage 1: assets which are performing in line with expectations, for which the value adjustments correspond to the expected losses related to the occurrence of default in the 12 months following the reporting date;*
- Stage 2: exposures whose creditworthiness is concerned by a significant deterioration, but for which the losses cannot yet be observed. Adjustments are calculated considering the loss expected over the lifetime of the exposure;
- *Stage 3: includes all non-performing exposures, and must be adjusted using the concept of lifetime loss.*

Specifically as regards loans and advances to customers, performing loans are broken down into:

- Stage 1: loans that have not undergone significant impairment since initial recognition;
- Stage 2: credit exposures that have seen a significant increase in credit risk since initial recognition.

Where there is evidence of impairment, the financial assets in question – in line with all the remaining assets pertaining to the same counterparty, if such assets exist – are considered impaired and move to stage 3. In relation to those exposures, represented by financial assets classified – pursuant to the provisions of Circular 262/2005 of the Bank of Italy – in the categories of bad loans, unlikely-to-pay loans and loans past due for more than ninety days, value adjustments must be recognised equal to the expected losses over their entire residual life.

For financial assets that show no evidence of impairment (performing financial instruments), instead, it must be verified whether there are indicators that show that the credit risk of the individual transaction has increased significantly since initial recognition. The results of this assessment, in terms of staging and measurement, are the following:

- where these indicators are found, the financial asset transfers to Stage 2. In this case, the assessment requires that value adjustments be recognised equal to the expected losses over the entire residual life of the financial instrument, consistent with the provisions of international accounting standards and even if a loss in value has not yet occurred;
- where said indicators do not exist, the financial asset transfers to Stage 1. In this case, the assessment requires that the expected losses over the next twelve months be recognised, consistent with the provisions of international



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

accounting standards and even if a loss in value has not yet occurred.

These adjustments are reviewed at each subsequent reporting date both to periodically check that the continuously updated loss estimates are consistent, as well as to take into account the change in forecast horizon for calculation of expected loss.

As regards the measurement of financial assets and, in particular, the identification of a “significant increase” in credit risk (a necessary and sufficient condition for classification of the asset being assessed in Stage 2), the elements that constitute the main determinants to be taken into consideration by the Group are the following:

- significant increase in the associated Probability of Default during the period from the date the account was opened to the reference date. The PD is determined using the rating system in place at the various recognition dates (account opening date and accounting recognition date);
- delays in payment (i.e. position past due or overdue) that continue for at least 30 consecutive days for all loans with the exception of salary/pension-backed loans, which are moved to Stage 2 following four payments past due;
- forbearance status, i.e. the account is subject to forbearance;
- exposure classified as non-performing by other banks (thus included in “system-wide adjusted non-performing loans”);
- qualitative information held by the competent structures (of the sales network or headquarters) which, though not resulting in the situations in the previous points, are deemed symptomatic of a possible worsening in the creditworthiness to levels that do not require classification in default.

The “staging” of securities entails some unique considerations. In fact, unlike loans, for this type of exposure, purchase and sale transactions subsequent to the first purchase (made with reference to the same ISIN) can typically fall under the ordinary activity of position management (with consequent need to identify a methodology to adopt for the identification of sales and reimbursements in order to determine the residual quantities of the individual transactions to which a credit quality/rating is associated that will be compared with that of the reporting date). In this context, using the “first-in-first-out” or “FIFO” methodology (for the transfer to the income statement of the recognised ECL, in the case of sales and reimbursements) contributes to more transparent portfolio management, including from the perspective of front-office operators, allowing, simultaneously, a continuous updating of the assessment of creditworthiness based on new purchases.

Once the assignment of the exposures to the various credit risk stages has been defined, the expected losses (ECL) are calculated, at the level of individual transaction or security tranche, starting from the modelling developed by the Group, based on the parameters of Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD), to which appropriate adjustments are made, in order to ensure compliance with the specific requirements of IFRS 9.

The PD, LGD, and EAD are defined as follows:



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

- PD (Probability of Default): likelihood of transferring from a performing status to that of non-performing over a one-year time horizon. In the Cassa di Risparmio di Asti Group, the values of PD derive from the internal rating model, where available, supplemented by external valuations. *For salary/pension-backed loans, the PD is determined based on the past-due ranges;*
- LGD (Loss Given Default): percentage of loss in the event of default. It is quantified based on past experience of recoveries discounted on accounts transferred to non-performing status;
- EAD (Exposure At Default) or credit equivalent: amount of exposure at the time of default.

In order to comply with the provisions of IFRS 9, specific adjustments to the aforementioned factors were necessary, including in particular:

- *adoption of a Point in Time (PIT) PD against the Through the Cycle (TTC) PD used for Basel purposes;*
- use of multi-year PDs and, where necessary, LGDs in order to determine the expected loss for the entire residual life of the financial instrument (Stages 2 and 3);

Furthermore, the measurement of financial assets reflects the best estimate of the effects of future conditions, especially in relation to the economic context, on which the forward-looking risk parameters are dependent. Within the scope of IFRS 9, particular importance is taken on by the information on the future macroeconomic scenarios that the Group may be operating in, which influence the situation of borrowers with regard to both the “risk” of migration of exposures to lower quality classes (thus relating to staging) and to the recoverable amount (thus relating to the determination of the expected loss on the exposures).

“Non-performing loans” are balance sheet and off-balance sheet loans to borrowers that fall within the “non-performing” category, broken down into:

- bad loans;
- unlikely-to-pay loans;
- non-performing past due and/or overdue exposures (long-term non-fulfilment or past-due payments).

In line with that set out in the reference regulations, the valuation of non-performing loans (i.e. of the presumed recoveries and, as a result, of the corresponding losses) takes into consideration the various alternative scenarios that could presumably occur in the near future.

The application of the “multi-scenario” approach, introduced at the time of first-time adoption of IFRS 9, is expressly envisaged by the “Group policies for the classification and valuation of loans to ordinary customers”.

The definition of provisions for non-performing loans (and consequently of the corresponding probable sales) takes into consideration different alternative scenarios identified for their management. In particular, on the basis of what is reported in the ITG “Inclusion of cash flows expected from the sale on default of



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

loan” of the IFRS Foundation staff and in the EBA Guidelines on “management of non-performing and forborne exposures” (EBA/GL/2018/06) for the proactive management of NPLs, forward-looking factors that include possible sales scenarios are taken into account, with effects in terms of valuation also for non-performing loans, if they represent a possible method of realising cash of flows.

In particular, in line with the provisions of IFRS 9 § B5.5.4, the following two macro-scenarios have been identified:

- direct management: treatment of the exposure in line with the ordinary management methods, in order to pursue the maximum recovery possible over the medium/long term, managing the non-performing loan through the Bank’s operational structures and processes (internal management), or availing of specialised operators, also on a permanent basis;
- assignment: disposal of the loan through assignment to counterparties operating on the market, according to an approach of maximising recovery over a more limited time frame, immediately benefiting from savings in terms of resources (liquidity, capital, workforce).

For exposures that, at the level of the individual counterparty, are less than or equal to 100 thousand euros considering the sum of cash credits and signature credits, the estimation of assumed losses and corresponding recovery values is carried out using an analytical-statistical methodology, which takes into account both the counterparty’s membership in private or corporate segments, consistent with the AIRB LGD models, the nature of the relationship (distinguishing between collateralised and other positions).

For the purposes of the multi-scenario valuation, the Impaired Loans Department identifies, within the overall portfolio of non- impaired loans, the sub-portfolios subject to possible assignment, taking into consideration, first and foremost, the default status and any other useful information for this purpose. The same Department also determines, for each sub-portfolio, the probability of occurrence of the various transfer scenarios identified. The product of the probability of disposal and the total gross book value (GBV) of the positions that are part of a given portfolio is called the “mathematical expectation of disposal” of the portfolio.

For the definition of the scenarios to be considered, and the combination of the various scenarios with a specific sub-portfolio and their attribution of the respect probability of occurrence, reference is specifically made to:

- the Group’s NPL management strategy, as shown in the various planning documents (NPE Strategy, Strategic Plan, Budget);
- historical analysis of what has occurred in the recent past with regard to NPLs, both referring to the Group and, more generally, in the Italian and European financial systems;
- regulatory provisions, guidelines or simple indications from the various bodies at national and European level;
- assessments of the opportunities to manage single positions or portfolios of homogeneous loans.



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

The expected loss model provides for a constant update of the parameters used, both in relation to the direct management scenario and in relation to the sales scenarios and therefore reflects a dynamic management of the impaired credit portfolio. In fact, this dynamic management of the impaired credit portfolio entails, on the basis of the variability of the NPE market environment and the internal valuations conducted by the Bank's the inclusion in the scope of the sale of new positions or the exclusion of other positions initially identified for sale; these situations must be considered as entirely physiological in such a highly dynamic context, with the corresponding accounting consequences on value adjustments and recoveries. As a result, the ideal perimeter originally identified needs to be constantly updated and implemented, in terms of quality, quantity and depreciation, in order to keep it always aligned with the objectives of NPE Strategy.

The total amount of the presumed recovery is determined at the level of single account, as the average of the corresponding recoverable amounts deriving from the application of the various scenarios, weighted for the correlated probabilities of occurrence. The findings thus determined are presented in detail to the Board of Directors on a quarterly basis.

With reference to non-performing loans, when the Group has reasonable expectations of not being able to recover amounts in excess of those considered to be collectable or already collected, both in its entirety and on a portion, it proceeds with the full or partial derecognition of the exposure in accordance with the qualitative and quantitative criteria of the Group's policies (write-off). The accounting effects of the write-off produce the allocation to losses of the residual gross book value of the receivable from the customer up to the amount of the value adjustment expressed at the date of derecognition.

A) BALANCE SHEET

Sale and repurchase contracts (repurchase agreements, securities lending and contangos): the securities sold and subject to repurchase agreements are classified as committed financial instruments, when the purchaser has the right, by contract or agreement, to resell or recommit the underlying. The counterparty's liability is included in liabilities due to other banks, other deposits or customer deposits.

The securities purchased in relation to a repurchase contract are recorded as loans or advances to other banks or to customers. The difference between the sales price and the purchase price is recorded as interest, on an accruals basis over the life of the transaction, based on the effective rate of return. Securities lent continue to be recognised, while securities borrowed are not recognised, unless they are sold to third parties, and in that case the purchase or sale will be recorded and the profits or losses recognised in the income statement. The repayment obligation must be recorded at fair value as a trading liability.

Netting of financial instruments: financial assets and liabilities may be netted, reporting the net balance, when there is a legal right to carry out such netting, and the intention to settle the transactions for the net amount or sell the assets and settle the liability at the same time.



A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

Accruals and deferrals: accruals and deferrals that involve charges and income pertaining to the period, accrued on assets and liabilities, are recorded as adjustments to the assets and liabilities they refer to, and where they are not attributable to assets and liabilities, are recorded in the balance sheet items “other assets” and “other liabilities”.

B) SHAREHOLDERS' EQUITY

Costs to issue shares: the incremental costs attributable to the issue of new shares or options, or referring to the acquisition of a new asset, net of taxes, are included in shareholders' equity as a deduction from amounts received.

Dividends on ordinary shares: dividends on ordinary shares are recorded as a reduction of shareholders' equity in the year in which the Shareholders' Meeting approved their distribution.

Treasury shares: treasury shares acquired are recorded in a separate item of shareholders' equity, with a negative sign (and thus, are not subject to valuation).

Where those shares are subsequently resold, the amount received is recognised, up to the book value of the shares, in a separate item.

The positive or negative difference between the sale price of the treasury shares and the corresponding book value is respectively applied as an increase or decrease to the item “Share premium reserve”.

Valuation reserve: Those reserves include valuation reserves of financial assets measured at fair value through other comprehensive income, cash flow hedging derivatives, valuation reserves for changes in fair value of financial liabilities due to the changes in own creditworthiness, valuation reserves for actuarial gains/losses and revaluation at fair value instead of cost of property, plant and equipment carried out on first-time adoption of the IAS/IFRS.

Those reserves are posted net of deferred taxes.

C) INCOME STATEMENT

Revenues from the sale of goods or provision of services are recognised at the fair value of the consideration received or, in any event, when it is likely that future benefits will be received, and those benefits can be reliably quantified.

Thus, according to that set out in IFRS 15, revenues are recognised, with the exception of revenues from lease contracts, insurance contracts, financial instruments and from non-monetary exchanges between entities in the same branch:

- at a specific time, when the Group fulfils the obligation, transferring the service to the customer;
- over time, as the Group gradually fulfils the obligation to transfer the promised service to the customer.

The transfer of the goods or services to the customer occurs when the customer has control over those assets. In particular:



**PART A
ACCOUNTING
POLICIES**

A.2 – MAIN ITEMS OF THE CONSOLIDATED FINANCIAL STATEMENTS

- interest is recognised on a pro rata accruals basis with reference to the contractual interest rate or the effective one in the event of application of the amortised cost.
- interest on arrears, if contractually included, is recognised in the income statement only when it is actually collected;
- dividends are recognised in the income statement at the time their distribution is approved;
- commissions for service income are posted in the period when said services were rendered, on the basis of existing contractual agreements; commissions considered in calculating the amortised cost for the purpose of determining the effective interest rate are recognised under interest income;
- profits and losses deriving from the trading of financial instruments are recognised in the income statement at the time of completion of the sale, on the basis of the difference between the amount paid or received and the book value of the instruments;
- revenues from the sale of non-financial assets are recognised at the time the sale is completed, or when the obligation to pay to the customer is fulfilled.

Administrative costs and expenses are recognised on an accruals basis.

A.3 Information on transfers between portfolios of financial assets

There are no items of this type.



A.4 – INFORMATION ON FAIR VALUE

This section provides the fair value disclosure as required by IFRS 13.

Qualitative information

A.4.3 Fair value hierarchy

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date (exit price).

IFRS 13 defines the “Fair value hierarchy” based on the degree of observability of the measurement techniques used for valuations, and comprises three different levels:

- Level 1: if the financial instrument is listed on a market deemed “active”. For example, stock markets, trading networks organised between market makers and/or MTF systems;
- Level 2: if the fair value is measured using measurement techniques that use parameters observable on an active market as reference (for the same instrument or a similar instrument), other than the prices of the financial instrument;
- Level 3: if the fair value is calculated based on measurement techniques that use parameters that cannot be observed on an active market as reference.

The Cassa di Risparmio di Asti Group determined the fair value of financial instruments following the criteria set out above.

Level 1

For debt securities and equity securities listed on an active market, the fair value coincides with the prices on that market, which represents the best expression of value. In terms of identifying the active market, the Cassa di Risparmio di Asti Group set up specific rules and procedures to assign prices and verify the reliability of the listed prices acquired.

The Group circumscribes the active market to those cases where a price is available that can be found on an official price list, or, alternatively, is regularly provided by financial counterparties through publication on info-providers or in the specialised press.

Level 2

Where there is no active market, the fair value is determined using estimation methods and measurement models that take account of the risk factors correlated to the instruments and are based on data and parameters that can be observed on active markets.

Those techniques can consider the prices recorded in recent comparable transactions concluded at market conditions (comparable approach), or the values obtained by applying measurement techniques commonly applied and accepted by market operators and, thus, merely by way of example, models based on the discounting of



**PART A
ACCOUNTING
POLICIES**

A.4 – INFORMATION ON FAIR VALUE

cash flows, models that determine option prices and other techniques (level 2 fair value).

The fair value of the bonds issued by the Group and OTC derivatives are constructed as the present value of certain or uncertain future cash flows taken from the financial markets, input into specific models developed in specific IT procedures, made available by the consortium providing the IT systems, which was assigned the operational management thereof.

As regards the estimate of uncertain cash flows subordinate to the trend in interest rates, the related forward rates are determined: forward interest rates, rates implicit in current rates, spot rates, rates relating to future periods.

With regard to the measurement of the uncertain cash flows from the optional components included in structured securities, based on the specific type of option, the Black&Scholes, Cox Ross Rubinstein, Montecarlo, Black76 and Kirk methods and the binomial trees model are applied.

For debt securities the fair value is constructed as the present value of future cash flows at current market rates.

For equity securities not listed on an active market, the fair value was determined using, where existing, the price obtained from recent, ordinary market transactions between knowledgeable, willing parties.

Level 3

The fair value is calculated based on measurement techniques that use parameters that cannot be observed on the market as reference.

The Group recognises in this level certain equity securities, included under “Financial assets measured at fair value through other comprehensive income” and certificates of deposit, included under “Debt securities in issue”, using the cost method. For the purpose of disclosure, this category also includes the fair value of loans and advances and deposits to/from banks and customers. For salary/pension-backed loans, the fair value is constructed as the present value of cash flows relating to repayments discounted at the average interest rate deriving from the assignments occurring during the reporting period, also considering the pre-payment effects.



A.4 – INFORMATION ON FAIR VALUE

Quantitative Information

A.4.5 Fair value hierarchy

A.4.5.1 – Assets and liabilities measured at fair value on a recurring basis: breakdown by fair value levels

FINANCIAL ASSETS/LIABILITIES MEASURED AT FAIR VALUE	Total 31/12/2024			Total 31/12/2023		
	L1	L2	L3	L1	L2	L3
1. Financial assets measured at fair value through profit or loss	0	87	141,737	3	9,605	98,893
a) Financial assets held for trading	0	87	88,257	3	964	37,515
b) Financial assets designated at fair value	0	0	0	0	0	0
c) Other financial assets mandatorily measured at fair value	0	0	53,480	0	8,641	61,378
2. Financial assets measured at fair value through other comprehensive income	924,216	225,000	14,027	803,758	225,000	21,908
3. Hedging derivatives	0	2	0	0	18,312	0
4. Property, plant and equipment	0	0	0	0	0	0
5. Intangible assets	0	0	0	0	0	0
TOTAL	924,216	225,089	155,764	803,761	252,917	120,801
1. Financial liabilities held for trading	0	1,936	0	0	1,974	0
2. Financial liabilities designated at fair value	0	12,496	0	0	12,768	0
3. Hedging derivatives	0	79,531	0	0	112,954	0
TOTAL	0	93,963	0	0	127,696	0

Key: L1=Level 1 L2=Level 2 L3=Level 3



PART A
ACCOUNTING
POLICIES

A.4 – INFORMATION ON FAIR VALUE

A.4.5.2 – Annual changes in financial assets measured at fair value on a recurring basis (level 3)

	Financial assets measured at fair value through profit or loss				Financial assets measured at fair value through other comprehensive income	Hedging derivatives	Property, plant and equipment	Intangible assets
	Total	of which: a) financial assets held for trading	of which: b) financial assets designated at fair value	of which: c) other financial assets mandatorily measured at fair value				
A. OPENING BALANCE	98,893	37,515	0	61,378	21,908	0	0	0
2. INCREASES	112,527	97,485	0	15,042	37,777	0	0	0
2.1. Purchases	30,886	30,440	0	446	37,000	0	0	0
2.2. Profits recognised in:	42,570	41,606	0	964	550	0	0	0
2.2.1. Income statement	42,570	41,606	0	964	532	0	0	0
of which: capital gains	36,947	35,983	0	964	0	0	0	0
2.2.2. Shareholders' equity	0	X	0	X	18	0	0	0
2.3. Transfers from other levels	8,713	0	0	8,713	0	0	0	0
2.4. Other increases	30,358	25,439	0	4,919	227	0	0	0
3. DECREASES	69,683	46,743	0	22,940	45,658	0	0	0
3.1. Sales	32,547	14,751	0	17,796	37,368	0	0	0
3.2. Redemptions	5,097	5,097	0	0	7,210	0	0	0
3.3. Losses recognised in:	27,823	26,895	0	928	1,080	0	0	0
3.3.1. Income statement	27,823	26,895	0	928	517	0	0	0
of which: capital losses	27,823	26,895	0	928	0	0	0	0
3.3.2. Shareholders' equity	0	X	0	X	563	0	0	0
3.4. Transfers to other levels	0	0	0	0	0	0	0	0
3.5. Other decreases	4,216	0	0	4,216	0	0	0	0
4. CLOSING BALANCE	141,737	88,257	0	53,480	14,027	0	0	0



A.4 – INFORMATION ON FAIR VALUE

A.4.5.4 – Assets and liabilities not measured at fair value or measured at fair value on a non-recurring basis: breakdown by fair value levels

ASSETS/LIABILITIES NOT MEASURED AT FAIR VALUE OR MEASURED AT FAIR VALUE ON A NON- RECURRING BASIS	Total 31/12/2024				Total 31/12/2023			
	BV	L1	L2	L3	BV	L1	L2	L3
1. Financial assets measured at amortised cost	9,547,145	1,827,387	0	8,299,754	9,593,127	1,665,051	0	7,726,007
2. Property, plant and equipment held for investment purposes	45,582	0	0	36,154	50,440	0	0	70,432
3. Non-current assets held for sale and discontinued operations	2,375	0	0	2,375	2,375	0	0	2,375
TOTAL	9,595,102	1,827,387	0	8,338,283	9,645,942	1,665,051	0	7,798,815
1. Financial liabilities measured at amortised cost	11,372,645	0	988,943	9,044,551	11,150,840	0	1,127,779	8,866,755
2. Liabilities associated with assets classified as held for sale	0	0	0	0	0	0	0	0
TOTAL	11,372,645	0	988,943	9,044,551	11,150,840	0	1,127,779	8,866,755

A.5 Information on “day one profit/loss”

The Group does not hold and has not held this type of instrument to which to apply the required disclosure.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

SECTION 1– CASH AND CASH EQUIVALENTS - ITEM 10

1.1 CASH AND CASH EQUIVALENTS: BREAKDOWN	Total 2024	Total 2023
a) Cash	60,305	62,792
b) Current accounts and demand deposits with Central Banks	810,000	555,123
c) Current accounts and demand deposits with banks	26,440	29,078
Total	896,745	646,993

The item 'Current accounts and demand deposits with Central Banks' consists entirely of the ECB deposit facility transaction.

SECTION 2 – FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS - ITEM 20

2.1 FINANCIAL ASSETS HELD FOR TRADING: BREAKDOWN BY TYPE	Total 2024			Total 2023		
	Level 1	Level 2	Level 3	Level 1	Level 2	Level 3
Items/Amounts						
A. Balance sheet assets						
1. Debt securities	0	0	0	3	0	0
1.1 Structured securities	0	0	0	0	0	0
1.2 Other debt securities	0	0	0	3	0	0
2. Equity securities	0	0	0	0	0	0
3. Units of UCITS	0	0	0	0	0	0
4. Loans	0	0	88,257	0	0	37,515
4.1 Repurchase agreements	0	0	0	0	0	0
4.2 Other	0	0	88,257	0	0	37,515
Total (A)	0	0	88,257	3	0	37,515
B. Derivatives	0	0	0			
1. Financial derivatives:	0	87	0	0	964	0
1.1 Trading	0	32	0	0	948	0
1.2 Linked to fair value option	0	55	0	0	16	0
1.3 Other	0	0	0	0	0	0
2. Credit derivatives	0	0	0	0	0	0
2.1 Trading	0	0	0	0	0	0
2.2 Linked to fair value option	0	0	0	0	0	0
2.3 Other	0	0	0	0	0	0
Total (B)	0	87	0	0	964	0
Total (A+B)	0	87	88,257	3	964	37,515

Key:

L1 = Level 1

L2 = Level 2

L3 = Level 3

The item “B. Derivatives - Level 2” mainly refers to the fair value of derivative contracts subject to “operational hedge”.



**PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS**

2.2 FINANCIAL ASSETS HELD FOR TRADING: BREAKDOWN BY BORROWER/ISSUER/COUNTERPARTY Items/Amounts	Total 2024	Total 2023
A. Balance sheet assets		
1. Debt securities	0	3
a) Central Banks	0	0
b) Public administration	0	0
c) Banks	0	0
d) Other financial companies	0	3
of which: insurance companies	0	0
e) Non-financial companies	0	0
2. Equity securities	0	0
a) Banks	0	0
b) Other financial companies	0	0
of which: insurance companies	0	0
c) Non-financial companies	0	0
d) Other issuers	0	0
3. Units of UCITS	0	0
4. Loans	88,257	37,515
a) Central Banks	0	0
b) Public administration	155	73
c) Banks	0	0
d) Other financial companies	139	115
of which: insurance companies	137	114
e) Non-financial companies	236	155
f) Households	87,727	37,172
Total (A)	88,257	37,518
B. Derivatives		
a) Central Counterparties	0	0
b) Other	87	964
Total (B)	87	964
Total (A+B)	88,344	38,482

2.5 OTHER FINANCIAL ASSETS MANDATORILY MEASURED AT FAIR VALUE: BREAKDOWN BY TYPE Items/Amounts	Total 2024			Total 2023		
	L1	L2	L3	L1	L2	L3
1. Debt securities	0	0	227	0	0	467
1.1 Structured securities	0	0	0	0	0	0
1.2 Other debt securities	0	0	227	0	0	467
2. Equity securities	0	0	0	0	0	0
3. Units of UCITS	0	0	47,606	0	8,641	56,000
4. Loans	0	0	5,647	0	0	4,911
4.1 Repurchase agreements	0	0	0	0	0	0
4.2 Other	0	0	5,647	0	0	4,911
Total	0	0	53,480	0	8,641	61,378

Key

L1 = Level 1

L2 = Level 2

L3 = Level 3



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

The item "Debt securities" consists of:

- € 39 thousand from mezzanine and junior class securities connected to the Maggesi securitisation transaction;
- € 20 thousand from mezzanine class securities connected with the Pop NPLs 2019 securitisation transaction;
- € 26 thousand from mezzanine and junior class securities connected to the Pop NPLs 2020 securitisation transaction;
- € 57 thousand from mezzanine and junior class securities connected to the BCC NPLs 2021 securitisation transaction;
- € 9 thousand from mezzanine class securities connected to the BCC NPLs 2022 securitisation transaction;
- € 47 thousand from mezzanine and junior class securities connected to the Luzzatti Pop NPL 2022 securitisation transaction;
- € 27 thousand from mezzanine and junior class securities connected to the Luzzatti Pop NPL 2023 securitisation transaction;
- € 2 thousand from mezzanine and junior class securities connected to the Luzzatti Pop NPL 2024 securitisation transaction;

The "Units of UCITS" held by the Bank consist of:

- 3 Italian property funds: Fondo Core Nord Ovest NM for € 7,420 thousand, Fondo Alfieri Ret DS NM for € 4,886 thousand and Fondo Illimity Re Credit Fund for € 24,559 thousand;
- six closed-end reserved alternative investment funds: Illimity Credit and Corporate Turnaround Fund for € 3,396 thousand, IDEA CCR I Comparto Crediti for € 872 thousand, Fondo Atlante for € 1,385 thousand, Nextalia Private for € 1,403 thousand, Keystone for € 3,398 thousand and Nextalia Credit for € 287 thousand.



2.6 OTHER FINANCIAL ASSETS MANDATORILY MEASURED AT FAIR VALUE: BREAKDOWN BY BORROWER/ISSUER	Total 2024	Total 2023
1. Equity securities	0	0
of which: banks	0	0
of which: other financial companies	0	0
of which: non-financial companies	0	0
2. Debt securities	227	467
a) Central Banks	0	0
b) Public administration	0	0
c) Banks	0	0
d) Other financial companies	227	467
of which: insurance companies	0	0
e) Non-financial companies	0	0
3. Units of UCITS	47,606	64,641
4. Loans	5,647	4,911
a) Central Banks	0	0
b) Public administration	0	0
c) Banks	75	2
d) Other financial companies	5,572	4,909
of which: insurance companies	0	0
e) Non-financial companies	0	0
f) Households	0	0
Total	53,480	70,019

SECTION 3 – FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME - ITEM 30

3.1 FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME: BREAKDOWN BY TYPE	Total 2024			Total 2023		
Items/Amounts	L1	L2	L3	L1	L2	L3
1. Debt securities	923,302	0	0	802,950	0	0
1.1 Structured securities	0	0	0	0	0	0
1.2 Other debt securities	923,302	0	0	802,950	0	0
2. Equity securities	914	225,000	606	808	225,000	629
3. Loans	0	0	13,421	0	0	21,279
Total	924,216	225,000	14,027	803,758	225,000	21,908

Key

L1 = Level 1

L2 = Level 2

L3 = Level 3

The item "Other debt securities" consists of:

- Italian government securities with a book value of € 477,064 thousand;
- securities issued by EU member states for a book value of € 446,238 thousand.

The item 'Equity securities' consists of investments in investee companies.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

3.2 FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME: BREAKDOWN BY BORROWER/ISSUER Items/Amounts	Total 2024	Total 2023
1. Debt securities	923,302	802,950
a) Central Banks	0	0
b) Public administration	923,302	802,950
c) Banks	0	0
d) Other financial companies	0	0
of which: insurance companies	0	0
e) Non-financial companies	0	0
2. Equity securities	226,520	226,437
a) Banks	225,913	225,807
b) Other issuers:	607	630
- other financial companies	255	278
of which: insurance companies	0	0
- non-financial companies	352	352
- other	0	0
3. Loans	13,421	21,279
a) Central Banks	0	0
b) Public administration	422	468
c) Banks	0	0
d) Other financial companies	67	263
of which: insurance companies	67	263
e) Non-financial companies	204	212
f) Households	12,728	20,336
Total	1,163,243	1,050,666

As at 31 December 2024, financial assets measured at fair value through other comprehensive income are mostly attributable to Italian borrowers/issuers, with the following exceptions:

- € 12 thousand relating to the investee company SWIFT;
- € 446.24 million from securities issued by EU member states.

3.3 FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME: GROSS VALUE AND OVERALL VALUE ADJUSTMENTS	Gross value					Overall value adjustments				Total partial write-offs (*)
	Stage 1	of which: instruments with low credit risk	Stage 2	Stage 3	Purchased or originated credit impaired	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	
Debt securities	923,544	923,544	0	0	0	(242)	0	0	0	0
Loans	10,366	10,366	8	4,226	0	(64)	0	(1,115)	0	0
Total 2024	933,910	933,910	8	4,226		(306)	0	(1,115)		X
Total 2023	820,406	820,406	10	5,694	0	(359)	0	(1,522)	0	X

* Value to be presented for disclosure purposes



IMPAIRMENT TEST ON FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME

In accordance with IFRS, the bonds in the FVOCI portfolio were subject to impairment test with the recognition of a value adjustment of € 242 thousand entirely attributable to instruments classified in stage 1; the loans in the FVOCI portfolio were subject to impairment test with the recognition of a value adjustment of € 1,179 thousand, of which € 64 thousand attributable to stage 1 and € 1,115 to stage 3.

SECTION 4 – FINANCIAL ASSETS MEASURED AT AMORTISED COST - ITEM 40

4.1 FINANCIAL ASSETS MEASURED AT AMORTISED COST: BREAKDOWN BY TYPE OF LOANS AND ADVANCES TO BANKS	Total 2024						Total 2023					
	Book value			Fair value			Book value			Fair value		
	Stage 1 and 2	Stage 3	Purchased or originated credit impaired	L1	L2	L3	Stage 1 and 2	Stage 3	Purchased or originated credit impaired	L1	L2	L3
Type of transaction/Amounts												
A. Loans and advances to Central Banks	66,578	0	0	0	0	66,578	66,386	0	0	0	0	66,386
1. Time deposits	0	0	0	X	X	X	0	0	0	X	X	X
2. Compulsory reserve	66,578	0	0	X	X	X	66,386	0	0	X	X	X
3. Repurchase agreements	0	0	0	X	X	X	0	0	0	X	X	X
4. Other	0	0	0	X	X	X	0	0	0	X	X	X
B. Loans and advances to banks	82,222	0	0	0	0	82,065	125,900	6	0	0	0	125,888
1. Loans	82,222	0	0	0	0	82,065	125,900	6	0	0	0	125,888
1.1 Current accounts	905	0	0	X	X	X	1,141	0	0	X	X	X
1.2. Time deposits	0	0	0	X	X	X	0	0	0	X	X	X
1.3. Other loans:	81,317	0	0	X	X	X	124,759	6	0	X	X	X
- Reverse repurchase agreements	0	0	0	X	X	X	0	0	0	X	X	X
- Lease loans	0	0	0	X	X	X	0	0	0	X	X	X
- Other	81,317	0	0	X	X	X	124,759	6	0	X	X	X
2. Debt securities	0	0	0	0	0	0	0	0	0	0	0	0
2.1 Structured securities	0	0	0	0	0	0	0	0	0	0	0	0
2.2 Other debt securities	0	0	0	0	0	0	0	0	0	0	0	0
Total	148,800	0	0	0	0	148,643	192,286	6	0	0	0	192,274

Key

FV = Fair value

BV = Book value

The item “Other loans - Other” consists primarily of the guarantee deposit guaranteeing derivative contracts for € 71,799 thousand.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

4.2 FINANCIAL ASSETS MEASURED AT AMORTISED COST: BREAKDOWN BY TYPE OF LOANS AND ADVANCES TO CUSTOMERS Type of transaction/Amounts	Total 2024						Total 2023					
	Book value			Fair value			Book value			Fair value		
	Stage 1 and 2	Stage 3	Purchased or originated credit impaired	L1	L2	L3	Stage 1 and 2	Stage 3	Purchased or originated credit impaired	L1	L2	L3
1. Loans	7,013,633	208,760	7,689	0	0	7,977,201	7,166,665	161,552	15,099	0	0	7,343,316
1. Current accounts	364,471	10,888	37	X	X	X	352,126	9,964	264	X	X	X
2. Reverse repurchase agreements	0	0	0	X	X	X			0	X	X	X
3. Mortgages	4,492,743	152,002	6,740	X	X	X	4,621,518	112,468	13,610	X	X	X
4. Credit cards and personal loans, including salary/pension-backed loans	1,370,320	32,879	678	X	X	X	1,378,516	28,357	904	X	X	X
5. Lease loans	0	0	0	X	X	X			0	X	X	X
6. Factoring	0	0	0	X	X	X			0	X	X	X
7. Other loans	786,099	12,991	234	X	X	X	814,505	10,763	321	X	X	X
2. Debt securities	2,168,139	124	0	1,827,387	0	173,910	2,057,439	80	0	1,665,051	0	190,417
2.1. Structured securities	425	0	0	0	0	425	0	0	0	0	0	0
2.2. Other debt securities	2,167,714	124	0	1,827,387	0	173,485	2,057,439	80	0	1,665,051	0	190,417
Total	9,181,772	208,884	7,689	1,827,387	0	8,151,111	9,224,104	161,632	15,099	1,665,051	0	7,533,733

Key

L1 = Level 1
L2 = Level 2
L3 = Level 3

Debt securities primarily consist of:

- € 1,647,533 thousand from securities issued by the Italian State;
- € 341,624 thousand from securities issued by EU member states;
- € 97,722 thousand from senior class securities connected to the Maggese securitisation transaction with derecognition;
- € 5,132 thousand from securities representing loans disbursed by Credimi;
- € 7,391 thousand from senior class securities connected to the Pop NPLs 2019 securitisation transaction with derecognition;
- € 8,166 thousand from senior class securities connected to the Pop NPLs 2020 securitisation transaction with derecognition;
- € 16,640 thousand from senior class securities connected to the BCC NPLs 2021 securitisation transaction with derecognition;
- € 3,994 thousand from senior class securities connected to the BCC NPLs 2022 securitisation transaction with derecognition;
- € 12,074 thousand from securities representing loans disbursed by Luzzatti Pop NPLs 2022;
- € 6,785 thousand from securities representing loans disbursed by Luzzatti Pop NPLs 2023;
- € 8,787 thousand from securities representing loans disbursed by Luzzatti Pop NPLs 2024;



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

- € 12,415 thousand from medium/long-term debt securities issued by unlisted Italian companies.

Loans and advances to customers are shown net of third-party funds under administration which amount to € 30,912 thousand.

For details on non-performing assets, please refer to “Part E – Information on risks and relative hedging policies, Section 1 - Credit Risk.”

4.3 FINANCIAL ASSETS MEASURED AT AMORTISED COST: BREAKDOWN BY BORROWER/ISSUER OF LOANS AND ADVANCES TO CUSTOMERS Type of transaction/Amounts	Total 2024			Total 2023		
	Stage 1 and 2	Stage 3	Purchased or originated credit impaired	Stage 1 and 2	Stage 3	Purchased or originated credit impaired
1. Debt securities	2,168,139	124	0	2,057,439	80	0
a) Public administration	1,989,158	0	0	1,861,797	0	0
b) Other financial companies	0	0	0	187,705	0	0
of which: insurance companies	0	0	0		0	0
c) Non-financial companies	178,981	124	0	7,937	80	0
2. Loans to:	7,013,633	208,760	7,689	7,166,665	161,552	15,099
a) Public administration	32,548	3,219	4	36,679	3,104	2
b) Other financial companies	131,803	244	0	110,672	1,828	0
of which: insurance companies	4,465	20	0	5,718	27	0
c) Non-financial companies	2,408,048	101,333	3,743	2,513,013	62,230	7,724
d) Households	4,441,234	103,964	3,942	4,506,301	94,390	7,373
Total	9,181,772	208,884	7,689	9,224,104	161,632	15,099

4.4 FINANCIAL ASSETS MEASURED AT AMORTISED COST: GROSS VALUE AND OVERALL VALUE ADJUSTMENTS Type of transaction/Amounts	Gross value					Overall value adjustments				Total partial write-offs*
	Stage 1	of which: instruments with low credit risk	Stage 2	Stage 3	Purchased or originated credit impaired	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	
Debt securities	2,065,554	2,065,554	104,474	138	0	-914	-975	-14	0	0
Loans	6,726,859	1,064,803	482,422	385,983	9,862	-17,261	-29,587	-177,223	-2,173	-24,663
Total 2024	8,792,413	3,130,357	586,896	386,121	9,862	-18,175	-30,562	-177,237	-2,173	-24,663
Total 2023	8,695,546	3,029,958	776,360	301,711	31,657	-19,037	-36,479	-140,073	-16,558	-31,965

* Value to be presented for disclosure purposes

With reference to non-performing loans, please refer to the detailed disclosure provided below in table A.1.5, Part E of these Notes to the consolidated financial statements.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

SECTION 5 – HEDGING DERIVATIVES - ITEM 50

5.1 HEDGING DERIVATIVES: BREAKDOWN BY HEDGING TYPE AND UNDERLYING ASSET	Fair value 2024			NV	Fair value 2023			NV
	L1	L2	L3		L1	L2	L3	
A. Financial derivatives	0	2	0	50,000	0	18,312	0	200,000
1) Fair value	0	2	0	50,000	0	18,312	0	200,000
2) Cash flows	0	0	0	0	0	0	0	0
3) Foreign investments	0	0	0	0	0	0	0	0
B) Credit derivatives	0	0	0	0	0	0	0	0
1) Fair value	0	0	0	0	0	0	0	0
2) Cash flows	0	0	0	0	0	0	0	0
TOTAL	0	2	0	50,000	0	18,312	0	200,000

The reduction in positive fair value for hedging derivatives is related to the early closing of outstanding contracts due to changed expectations about the level of interest rates.

5.2 HEDGING DERIVATIVES: BREAKDOWN BY PORTFOLIOS HEDGED AND BY HEDGING TYPE	Fair Value							Cash flows		Foreign investments
	Micro-hedge						Macro-hedge	Micro-hedge	Macro-hedge	
	Debt securities and interest rates	Equity securities and stock indices	Currencie s and gold	Credit	Com moditi es	Other				
1. Assets measured at fair value through other comprehensive income	0	0	0	0	X	X	X	0	X	X
2. Financial assets measured at amortised cost	2	X	0	0	X	X	X	0	X	X
3. Portfolio	X	X	0	0	X	X	X	0	X	X
4. Other transactions	X	X	X	X	X	X	0	X	0	X
Total assets	2	0	0	0	0	0	0	0	0	0
1. Financial liabilities	0	X	0	0	0	0	X	0	X	X
2. Portfolio	X	X	X	X	X	X	0	X	0	X
Total liabilities	0	0	0	0	0	0	0	0	0	0
1. Expected transactions	X	X	X	X	X	X	X	0	X	X
2. Financial assets and liabilities portfolio	X	X	X	X	X	X	0	X	0	0

SECTION 6 – CHANGE IN VALUE OF MACRO-HEDGED FINANCIAL ASSETS - ITEM 60

There are no items of this type.



SECTION 7 – EQUITY INVESTMENTS - ITEM 70

7.5 EQUITY INVESTMENTS: ANNUAL CHANGES	Total 2024	Total 2023
A. Opening balance	195	86
B. Increases	39	109
B.1 Purchases	0	105
B.2 Write-backs	0	0
B.3 Revaluations	0	0
B.4 Other changes	39	4
C. Decreases	0	0
C.1 Sales	0	0
C.2 Value adjustments	0	0
C.3 Write-downs	0	0
C.4 Other changes	0	0
D. Closing balance	234	195
E. Total revaluations	0	0
F. Total adjustments	5,938	5,938

SECTION 8 – INSURANCE RESERVES CHARGED TO REINSURERS - ITEM 80

There are no items of this type.

SECTION 9 – PROPERTY, PLANT AND EQUIPMENT - ITEM 90

9.1 PROPERTY, PLANT AND EQUIPMENT USED IN THE BUSINESS: BREAKDOWN OF ASSETS CARRIED AT COST Asset/Amounts	Total 2024	Total 2023
1. Owned assets	121,695	118,345
a) land	19,072	18,251
b) buildings	83,553	82,893
c) furniture and furnishings	8,931	7,422
d) electronic equipment	4,845	5,046
e) other	5,294	4,733
2. Rights of use acquired with leases	36,975	39,750
a) land	0	0
b) buildings	36,050	39,120
c) furniture and furnishings	0	43
d) electronic equipment	0	0
e) other	925	587
Total	158,670	158,095
of which: obtained by enforcing guarantees received	0	0

The item “other” includes the RoUs referring to the rental of vehicles.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

9.2 PROPERTY, PLANT AND EQUIPMENT HELD FOR INVESTMENT: BREAKDOWN OF ASSETS CARRIED AT COST Asset/Amounts	Total 2024				Total 2023			
	Book value	Fair value			Book value	Fair value		
		L1	L2	L3		L1	L2	L3
1. Owned assets	45,582	0	0	36,154	50,440	0	0	70,432
a) land	15,319	0	0	8,418	16,189	0	0	18,819
b) buildings	30,263	0	0	27,736	34,251	0	0	51,613
2. Rights of use acquired with leases	0	0	0	0	0	0	0	0
a) land	0	0	0	0	0	0	0	0
b) buildings	0	0	0	0	0	0	0	0
Total	45,582	0	0	36,154	50,440	0	0	70,432
of which: obtained by enforcing guarantees received	0	0	0	0	0	0	0	0

Key

L1 = Level 1

L2 = Level 2

L3 = Level 3



**PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS**

9.6 PROPERTY, PLANT AND EQUIPMENT USED IN THE BUSINESS: ANNUAL CHANGES	Land	Buildings	Furniture and furnishings	Electronic equipment	Other	Total
A. Gross opening balance	18,251	206,261	45,798	44,143	54,819	369,272
A.1 Total net decreases	0	84,248	38,334	39,097	49,499	211,178
A.2 Net opening balance	18,251	122,013	7,464	5,046	5,320	158,094
B. Increases:	821	12,969	2,994	1,667	3,354	21,805
B.1 Purchases	812	9,301	2,945	1,576	2,975	17,609
B.2 Capitalised expenditure on improvements	0	0	0	0	0	0
B.3 Recoveries	0	0	0	0	0	0
B.4 Increases in fair value booked to	0	0	0	0	0	0
a) shareholders' equity	0	0	0	0	0	0
b) income statement	0	0	0	0	0	0
B.5 Positive exchange differences	0	0	0	0	0	0
B.6 Transfer from properties held for investment	9	28	X	X	X	37
B.7 Other changes	0	3,640	49	91	379	4,159
C. Decreases:	0	15,379	1,527	1,868	2,455	21,229
C.1 Sales	0	0	55	96	0	151
C.2 Depreciation	0	9,898	1,418	1,772	2,410	15,498
C.3 Impairment losses booked to	0	0	0	0	0	0
a) shareholders' equity	0	0	0	0	0	0
b) income statement	0	0	0	0	0	0
C.4 Decreases in fair value booked to	0	0	0	0	0	0
a) shareholders' equity	0	0	0	0	0	0
b) income statement	0	0	0	0	0	0
C.5 Negative exchange differences	0	0	0	0	0	0
C.6 Transfers to:	0	0	0	0	0	0
a) property, plant and equipment held for investment	0	0	X	X	X	0
b) non-current assets held for sale and discontinued operations	0	0	0	0	0	0
C.7 Other changes	0	5,481	54	0	45	5,580
D. Net closing balance	19,072	119,603	8,931	4,845	6,219	158,670
D.1 Total net decreases	0	91,046	37,982	40,790	48,872	218,690
D.2 Gross closing balance	19,072	210,649	46,913	45,635	55,091	377,360
E. Carried at cost	0	0	0	0	0	0

The cost valuation criterion is used for all asset classes.

Items A.1 and D.1 "Total net decreases" include the sum of depreciation plus the impairment losses recognised to align the carrying amount of the assets with their recoverable amount.

For additional information, please refer to Part A - Section 15 - Other information in these Notes to the consolidated financial statements.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

9.7 PROPERTY, PLANT AND EQUIPMENT HELD FOR INVESTMENT: ANNUAL CHANGES	Total	
	Land	Buildings
A. Opening balance	16,189	34,251
B. Increases	667	2,844
B.1 Purchases	667	2,828
B.2 Capitalised expenditure on improvements	0	0
B.3 Increases in fair value	0	0
B.4 Write-backs	0	0
B.5 Positive exchange differences	0	0
B.6 Transfer from properties used in the business	0	0
B.7 Other changes	0	16
C. Decreases	1,537	6,832
C.1 Sales	511	447
C.2 Depreciation	0	1,388
C.3 Decreases in fair value	0	0
C.4 Impairment losses	0	0
C.5 Negative exchange differences	0	0
C.6 Transfers to:	9	28
a) properties used in the business	9	28
b) non-current assets held for sale and discontinued operations	0	0
C.7 Other changes	1,017	4,969
D. Closing balance	15,319	30,263
E. Measured at fair value	8,418	27,736

The cost valuation criterion is used for all asset classes.

SECTION 10 – INTANGIBLE ASSETS - ITEM 100

10.1 INTANGIBLE ASSETS: BREAKDOWN BY TYPE OF ASSETS	Total 2024		Total 2023	
	Finite life	Indefinite life	Finite life	Indefinite life
A.1 Goodwill	X	66,269	X	66,269
A.1.1 attributable to the Group	X	66,269	X	66,269
A.1.2 attributable to minorities	X	0	X	0
A.2 Other intangible assets	15,758	0	17,488	0
Of which: software	7,307	0	7,007	0
A.2.1 Assets carried at cost	15,758	0	17,488	0
a) Intangible assets generated internally	0	0	0	0
b) Other assets	15,758	0	17,488	0
A.2.2 Assets measured at fair value	0	0	0	0
a) Intangible assets generated internally	0	0	0	0
b) Other assets	0	0	0	0
Total	15,758	66,269	17,488	66,269

The item “Finite life” includes application software, the surface rights relating to the area where the Parent Company’s Branch no. 13 is built and intangible assets recognised in the financial statements following the acquisition of the subsidiary Biverbanca S.p.A. in 2012. The item “Indefinite life” includes the definitive recognition of goodwill realised in the acquisition carried out in 2012 by the Parent Company of 60.42% of Biverbanca S.p.A., equal to € 57.25 million, the recognition of



goodwill realised in the acquisition of 65% of the company Pitagora Contro Cessione del Quinto S.p.A. in 2015, equal to € 8.9 million and the recognition of goodwill realised in the acquisition of 65% of the company We Finance S.p.A. in 2021 for € 126.7 thousand by the subsidiary Pitagora.

Impairment test

In accordance with the indications of the Supervisory Authorities, Banca di Asti has carried out the impairment test on intangible assets and goodwill as at 31 December 2024.

Following the merger by incorporation of Biverbanca into Banca di Asti which took place in 2021, goodwill and intangible assets with a finite useful life previously referable to the former Biverbanca CGU were allocated to the Banca di Asti CGU, identified in the Parent Company's overall banking business net of the contribution of the Pitagora and We Finance CGUs.

The impairment test is aimed at verifying that the recoverable amount of an asset is not lower than its book value at the reporting date. If the test shows a recoverable amount lower than the book value, the difference constitutes an impairment loss to be charged to the income statement, aligning the book value to the recoverable amount thus determined.

Intangible assets with a finite useful life, subject to annual amortisation, are tested for impairment whenever there is evidence of impairment.

Goodwill, as required by IAS 36, must be tested for impairment at least once a year. With reference to goodwill, which by its nature cannot be measured independently, the impairment test must be carried out with reference to the CGU to which it is allocated. Pursuant to IAS 36, CGU means the smallest group of assets that generates largely independent cash inflows and also the minimum level at which the internal planning and reporting processes are managed. Therefore, this is the minimum level at which goodwill can be allocated, according to non-arbitrary criteria, and monitored.

As required by IAS 36, for the purposes of the impairment test, the recoverable amount is defined as the higher of the “value in use” and the “fair value” net of disposal costs.

The fair value represents the price that would be received for the sale of an asset (CGU) in an orderly transaction between market participants at the valuation date. For the purposes of IAS 36, the fair value must be considered net of disposal costs.

The value in use expresses the present value of future cash flows that are expected to be received from the continuous “use” of the asset (CGU).

Pursuant to IAS 36, it is not always necessary to determine both configurations of recoverable amount, if one of the two is higher than the book value. It is therefore sufficient for at least one of the two recoverable amount configurations to be higher than the book value for the impairment test to be considered passed.

The impairment test process is generally divided into the following main phases:

- identification of the asset (CGU) subject to testing;
- determination of the recoverable amount;



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

- determination of the book value of the asset (CGU), in line with the methods for determining the recoverable amount;
- comparison between recoverable amount and book value.

For the purposes of the impairment test, a methodological framework and an evaluation approach were adopted in continuity with previous years.

The impairment test on goodwill was developed with reference to the value-in-use configuration, determined on the basis of the Dividend Discount Model ("DDM") methodology in its variant with "Excess Capital".

The DDM method was developed on the basis of the balance sheet as at 31 December 2024 and the economic, equity and financial projections approved by the Boards of Directors of Banca di Asti and its subsidiaries.

The valuation parameters were updated on the basis of the market data at the reporting date.

Sensitivity analyses were also carried out in order to verify the variability of the results as the main valuation parameters and expected result flows change.

Lastly, a stress analysis was carried out on the individual parameters considered singularly on the basis of which the recoverable amount equals the book value.

Reference was made to the following baseline information to develop the impairment test:

With reference to Banca di Asti:

- Financial statements as at 31 December 2023;
- Balance sheet as at 31 December 2024;
- Economic and financial projections for the 2025-2029 period of Banca di Asti approved by the Board of Directors of Banca di Asti on 6 February 2025;
- Group Policy on impairment testing of goodwill and equity investments, approved by the Board of Directors of Banca di Asti on 28 January 2021;
- Information publicly available in relation to the reference market (volatility ratios, market rates, etc.).

With reference to Pitagora:

- Financial statements as at 31 December 2023;
- Draft financial statements as at 31 December 2024, approved by the Pitagora's Board of Directors;
- Economic and financial projections for the 2025-2029 period approved by the Board of Directors of Pitagora on 3 February 2025;
- Information publicly available in relation to the reference market (volatility ratios, market rates, etc.).

With reference to We Finance:

- Financial statements as at 31 December 2023;
- Draft financial statements as at 31 December 2024, approved by the We Finance's Board of Directors;
- Economic and financial projections for the 2025-2029 period approved by the Board of Directors of We Finance on 29 January 2025;



- Information publicly available in relation to the reference market (volatility ratios, market rates, etc.).

The impairment test was developed taking into account a scenario significantly affected by the uncertainty and volatility present on the financial markets as a result of the geopolitical situation characterised by the escalation of the Israeli-Palestinian conflict and the protracted Russian-Ukrainian conflict, and the effects of a restrictive monetary policy adopted by the Central Bank.

A) Impairment Test on goodwill of the "Cassa di Risparmio di Asti S.p.A." CGU

On 28 December 2012, Cassa di Risparmio di Asti S.p.A. acquired 60.42% of Biverbanca from Banca Monte dei Paschi di Siena for consideration of € 275.25 million, inclusive of the price adjustment linked to the value of the Biverbanca S.p.A. equity investment in Bank of Italy.

The acquisition of control over Biverbanca S.p.A. entailed the application of IFRS 3 (Business Combinations), which requires assets acquired and liabilities assumed to be accounted for in the consolidated financial statements at their fair value at the acquisition date, including any identifiable intangible assets not recognised in the financial statements of the acquired company, and the determination of goodwill on a residual basis, as the difference between the cost of the business combination and the net fair value of the assets and liabilities acquired.

The Group relied on the possibility established by IFRS 3 to perform a provisional purchase price allocation.

Then, in the 2013 consolidated financial statements of the Cassa di Risparmio di Asti Group, definitive goodwill of € 57.25 million was recognised. In 2019, Cassa di Risparmio di Asti acquired the minority interests not yet held by the Bank, thereby achieving a 100% interest in the share capital of Biverbanca S.p.A.

Following the merger by incorporation of Biverbanca into Banca di Asti which took place in 2021, goodwill and intangible assets with a defined useful life previously referable to the former Biverbanca CGU were allocated to the Banca di Asti CGU, identified as the banking business of the Parent Company, net of the contribution of the Pitagora and We Finance CGUs.

The goodwill set forth in the consolidated financial statements of the Cassa di Risparmio di Asti Group as at 31 December 2024, amounting to € 57.25 million, recognised following the acquisition of 60.42% of the share capital of Biverbanca in December 2012 and the completion of the purchase price allocation process pursuant to IFRS 3 - Business Combinations, was tested for impairment.

This goodwill is allocated to the Banca di Asti CGU; in this regard, note that, as envisaged in the accounting standards, it remained unchanged after the acquisition of full control over Biverbanca by Banca di Asti.

In relation to what is established in IAS 36 and the considerations set forth above, the impairment test on the above-mentioned goodwill called for the performance of



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

the following activities, also carried out with the assistance of a major consultancy firm:

- determination of the carrying value of the CGU;
- determination of the recoverable amount of the CGU and comparison with the carrying value.

1. Determination of the carrying value of the CGU

As at 31 December 2024, the carrying value of the CGU was equal to € 922.4 million and was determined on the basis of the sum of:

- Tangible shareholders' equity (excluding software) as at 31 December 2024 equal to € 1,021.5 million, net of the contribution of the subsidiary Pitagora and We Finance equal to € 87.1 million.

2. Determination of the recoverable amount of the CGU and comparison with the carrying value

Fair Value

Pursuant to IFRS 13, the fair value represents the price that would be received for the sale of an asset or which would be paid for the transfer of a liability in an orderly transaction between market participants at the valuation date.

In order to determine the recoverable amount of the Banca di Asti CGU at the reporting date of 31 December 2023, recourse was made only to the estimate of the value in use, as described in the following section, without proceeding with the calculation of fair value.

Value in Use

The value in use was estimated by applying the "Excess Capital" version of the Dividend Discount Model (DDM) method.

The DDM method (in the Excess Capital version commonly adopted in the banking and financial sectors) determines the value of a company (based on the potential dividends that it is estimated to be distributable to its shareholders prospectively, while maintaining an adequate level of capitalisation in line with regulatory requirements and consistent with the risk profile of its business. The DDM adopted is based on the following formula:

$$W = \sum_{i=1}^n \frac{D_i}{(1 + Ke)^i} + \frac{TV}{(1 + Ke)^n}$$

where:

W = Value in use

D_i = Potentially distributable dividend in the i-th explicit planning period

Ke = Discount rate represented by the cost of equity

n = Explicit projection period (expressed in number of years)

TV = Terminal Value at the end of the explicit planning period

Dividends potentially distributable in the projection period

The potentially distributable dividend flows were defined on the basis of the financial position as at 31 December 2024 and the 2025-2029 financial and economic



projections. Consistently with the methods for determining the carrying amount, the contribution of Pitagora and We Finance in terms of profitability and contribution to the supervisory capital of Banca di Asti was reversed. A capital requirement equal to the Tier 1 ratio of 11.45% and a Total Capital Ratio of 13.95% was considered in the development of distributable flows, in line with supervisory regulations and the outcome of the last SREP for the CR Asti Group.

Cost of equity

The cost of equity, equal to 10.47% (10.95% as at 31 December 2023), was estimated on the basis of the Capital Asset Pricing Model (CAPM), considering:

- rate of return on risk-free investments, estimated at 3.64% (4.18% as at 31 December 2023), equal to the average annual yield of BTPs with a ten-year maturity;
- beta, correlation factor between the actual return on a share and the total return on the reference market, assumed to be 1.138 (1.128 as at 31 December 2023) on the basis of the average coefficient reported on a sample of Italian retail banks (average surveys at 5 years, monthly);
- market risk premium, equal to 6.0% (6.0% as at 31 December 2023), in line with valuation practice in the Italian market.

Terminal value

The terminal value was determined by assuming:

- the potentially distributable dividend at the end of the plan horizon taking into account the capital requirements considered;
- the long-term growth rate, assumed to be 2.0% (2.0% as at 31 December 2023), in consideration of long-term inflation expectations.

Sensitivity analysis

A sensitivity analysis was developed on the values obtained in reaction to changes in the value of

- the cost of equity (+/- 0.50%),
- the long-term growth rate (+/- 0.50%),
- the expected result at the end of the projection period (+/- 10.0%).

The DDM method, developed on the basis of the elements described, leads to the estimate of a recoverable amount on average equal to € 1,465 million against the carrying amount of the Banca di Asti CGU in the consolidated financial statements equal to € 922 million.

The limit parameters which, individually considered, lead to a recoverable amount corresponding to the carrying amount are:

	Parameters/amounts used	"Limit" parameters/amounts
		Consolidated CGU
Cost of capital (ke)	10.47%	17.36% (+689 bps)
Long-term growth rate (g)	2.00%	Negative/not significant
Net profit of Terminal value (TV)	€ 146.8 million	€ 71.1 million (-51.6%)



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

Intangible assets with finite useful life

In accordance with IAS 36, considerations were made on the intangible assets with a finite useful life recognised in the financial statements following the acquisition of Biverbanca in order to check for the presence of indicators of impairment.

As of 31 December 2024, an intangible asset with a finite useful life, represented by the Core deposits linked to savings deposits, for € 8.1 million, is recognised.

The Core deposits show a residual life of 6 years and the annual write-down of this intangible asset is approximately € 1.4 million.

The value of such intangible assets is based in particular on the following variables:

- evolution of volumes over time, throughout the remaining useful life;
- profitability (mark down and commission income);
- direct costs;
- discount rate.

Based on the situation as at 31 December 2024, the following is noted:

- Compared to the book value at the time of the purchase price allocation in accordance with IFRS 3 ("PPA") following the amortisation recorded in the period, the book value of the Core deposits has decreased by 66.7%;
- Volumes of direct funding relating to current accounts and savings deposits equal to € 7,845 million, compared to € 1,154 million at the time of the PPA;
- In terms of profitability, the average mark down in 2024 of the Core deposits (current accounts and time deposits) remained positive and equal to 158 bps. The mark down estimated at the time of the PPA for the year 2024 was positive and equal to 127 bps;
- The cost-income ratio is lower than estimated at the time of the PPA, and equal to 55.9%;
- As at 31 December 2024, the discount rate represented by the cost of equity was 10.5%, above to that adopted at the time of the PPA (9.7%).

As at 31 December 2024, on the basis of the observation of the trend in the above-mentioned variables, it is deemed that there are no reasons to believe that the intangible assets have suffered from additional impairment beyond their annual amortisation.

B) Impairment test on goodwill of the Pitagora Contro Cessione del Quinto S.p.A. CGU

On 1 October 2015, Cassa di Risparmio di Asti S.p.A. acquired control over the company Pitagora S.p.A.

The acquisition of control entails the application of IFRS 3 (Business Combinations), which requires assets acquired and liabilities assumed to be accounted for in the consolidated financial statements at their fair value at the acquisition date, including any identifiable intangible assets not recognised in the financial statements of the acquired company, and the determination of goodwill on a residual basis, as the



difference between the cost of the business combination and the net fair value of the assets and liabilities acquired.

The Group relied on the possibility established by IFRS 3 to perform a provisional purchase price allocation.

Therefore, in the Group's consolidated financial statements as at 31 December 2015, provisional goodwill of € 8.895 million was recognised in relation to the Pitagora S.p.A. CGU.

The book value of the Pitagora S.p.A. CGU was equal to € 50.795 million and was determined on the basis of the sum of:

- tangible shareholders' equity of Pitagora as at 30 September 2015 after provisional adjustments, equal to € 41.9 million, which primarily takes into account the revaluation at fair value of the HTM financial assets;
- provisional goodwill of € 8.895 million, calculated as the excess of the price paid over the pro rata shareholders' equity post adjustments.

In determining the fair value of the CGU, the consideration used as a reference is equal to € 38.225 million.

During the course of 2016, the activity of valuing the assets, liabilities and contingent liabilities for the determination of definitive goodwill was completed: the activities performed did not bring to light additional fair values such so as to determine goodwill different from that provisionally determined at the time of the acquisition.

For Pitagora S.p.A., the goodwill set forth in the consolidated financial statements of the Cassa di Risparmio di Asti Group as at 31 December 2024, amounting to € 8.895 million, recognised following the acquisition of 65% of the share capital in October 2015 and the completion of the purchase price allocation process pursuant to IFRS 3 - Business Combinations, was tested for impairment. In continuity and in line with the internal reporting system, this goodwill is allocated to the CGU corresponding to the equity investment in Pitagora S.p.A.

In relation to what is established in IAS 36 and the considerations set forth above, the impairment test on the above-mentioned goodwill called for the performance of the following activities, also carried out with the assistance of a major consultancy firm:

- Determination of the carrying value of the CGU;
- Determination of the recoverable amount of the CGU and comparison with the carrying value.

1. Determination of the carrying value of the CGU

As at 31 December 2024, the carrying value of the CGU was equal to € 98.7 million and was determined on the basis of the sum of:

- Shareholders' equity of Pitagora as at 31 December 2024 equal to € 87.4 million;
- Goodwill equal to € 8.895 million. For the purposes of the impairment test, this goodwill was then grossed up, thus reaching a value of € 15.7 million. As set forth in IAS 36, this step is necessary in order to make the carrying



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

amount consistent with the recoverable amount (both referring to 100% of the CGU).

- Carrying amount of the We Finance equity investment equal to € 4.2 million.

2. Determination of the recoverable amount of the CGU and comparison with the carrying value

Fair Value

Pursuant to IFRS 13, the fair value represents the price that would be received for the sale of an asset or which would be paid for the transfer of a liability in an orderly transaction between market participants at the valuation date.

For the purposes of estimating the recoverable amount, the following elements were taken into consideration:

- During 2021, Pitagora signed a commercial partnership with the Iccrea Group. In this context, Iccrea acquired a stake in the capital of Pitagora.
- In addition, in October 2024 CR Asti sold a stake, representing 6.5% of the company's capital, to the Iccrea Group. To date, the company's body of shareholders is represented as follows: Banca di Asti with 56.5%; Bonino S.r.l. with 16.3%; *Management*, Pitagora collaborators and third parties with 7.2%; ICCREA Group with 20.0%.

In order to determine the recoverable amount of the Pitagora S.p.A. CGU at the reporting date of 31 December 2024, recourse was made only to the estimate of the value in use, as described in the following section, without proceeding with the calculation of fair value.

Value in Use

The value in use was estimated by applying the "Excess Capital" version of the Dividend Discount Model (DDM) method.

The DDM method was developed on the basis of the balance sheet as at 31 December 2024 and the economic, equity and financial projections approved by the Board of Directors of Banca di Asti on 6 February 2025.

The CGU's value in use was determined by discounting future distributable cash flows, based on the following formula:

$$W = \sum_{i=1}^n \frac{D_i}{(1 + Ke)^i} + \frac{TV}{(1 + Ke)^n}$$

where:

W = Value in use

D_i = Potentially distributable dividend in the i-th explicit planning period

Ke = Discount rate represented by the cost of equity

n = Explicit projection period (expressed in number of years)

TV = Terminal Value at the end of the explicit planning period

Dividends potentially distributable in the projection period



The potentially distributable dividend flows were defined on the basis of the financial position as at 31 December 2024 and the 2025-2029 financial and economic projections.

Consistently with the methods for determining the carrying amount, the contribution of We Finance in terms of profitability and contribution to the supervisory capital of Pitagora was reversed.

In the development of the distributable flows, a capital absorption equal to a Tier 1 ratio of 6% (6% as at 31 December 2023) was considered, in line with the current Supervisory Authority provisions for financial entities like Pitagora.

Cost of equity

The cost of equity, equal to 11.07% (11.45% as at 31 December 2023), was estimated on the basis of the Capital Asset Pricing Model (CAPM), considering:

- rate of return on risk-free investments, estimated at 3.64% (4.18% as at 31 December 2023), equal to the average annual yield of BTPs with a ten-year maturity;
- beta, correlation factor between the actual return on a share and the total return on the reference market, assumed to be 1.238 (1.212 as at 31 December 2023) on the basis of the average coefficient reported on a sample of companies operating in the reference market (average surveys at 5 years, monthly);
- *market risk premium*, equal to 6.0% (6.0% as at 31 December 2023), in line with valuation practice in the Italian market.

Terminal value

The terminal value was determined by considering:

- the potentially distributable dividend at the end of the plan horizon taking into account the capital requirements considered;
- the long-term growth rate, assumed to be 2.0% (2.0% as at 31 December 2023), in consideration of long-term inflation expectations.

Sensitivity analysis

A sensitivity analysis was developed on the values obtained in reaction to changes in the value of:

- the cost of equity (+/- 0.50%),
- the long-term growth rate (+/- 0.50%),
- the expected result at the end of the projection period (+/- 10.0%).

The development of the DDM method on the basis of the approach described leads to the estimate of an average recoverable amount of € 181 million, against the carrying amount of the Pitagora S.p.A. CGU in the consolidated financial statements equal to € 99 million and the equity investment in the separate financial statements equal to € 55 million (100%).



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

In light of the results obtained, the impairment test was therefore positively passed and the sensitivity analyses performed determined an interval between € 99 million and € 181 million.

The limit parameters which, individually considered, lead to a recoverable amount corresponding to the carrying amount are:

	Parameters/amounts used	"Limit" parameters/amounts
		Consolidated CGU
Cost of capital (ke)	11.07%	24.40% (+1,333 bps)
Long-term growth rate (g)	2.00%	Negative/not significant
Net profit of Terminal value (TV)	Euro 15.8 million	€ 3.1 million (-80.3%)

C) Impairment test on goodwill of the We Finance S.p.A. CGU

On 28 September 2021, the subsidiary Pitagora S.p.A. acquired an equity investment for a value of € 2,210 thousand, equal to 65% of the share capital of We Finance S.p.A., a company registered in the Register of Financial Intermediaries pursuant to Article 106 of the Consolidated Banking Act (TUB), operating in the consumer credit sector and in particular in the segment of salary/pension-backed loans and similar loans. We Finance S.p.A. therefore became part of the Cassa di Risparmio di Asti Group from 1 October 2021.

The acquisition of control entails the application of IFRS 3 (Business Combinations), which requires assets acquired and liabilities assumed to be accounted for in the consolidated financial statements at their fair value at the acquisition date, including any identifiable intangible assets not recognised in the financial statements of the acquired company, and the determination of goodwill on a residual basis, as the difference between the cost of the business combination and the net fair value of the assets and liabilities acquired.

The Group relied on the possibility established by IFRS 3 to perform a provisional purchase price allocation.

Therefore, in the Group's consolidated financial statements as at 31 December 2021, provisional goodwill of € 127 thousand was recognised in relation to the We Finance S.p.A. CGU.

The book value of the We Finance S.p.A. CGU was equal to € 50.795 million and was determined on the basis of the sum of:

- tangible shareholders' equity of We Finance as at 1 October 2021 after provisional adjustments, amounting to € 3.2 million;
- provisional goodwill of € 127 thousand, calculated as the excess of the price paid over the pro rata shareholders' equity post adjustments.

In determining the fair value of the CGU, the consideration used as a reference is equal to € 2.2 million.

During the course of 2022, the activity of measuring assets, liabilities and contingent liabilities for the determination of definitive goodwill was completed: the activities performed did not bring to light additional fair values such so as to determine goodwill different from that provisionally determined at the time of the acquisition.



For We Finance S.p.A., the goodwill set forth in the consolidated financial statements of the Cassa di Risparmio di Asti Group as at 31 December 2024, amounting to € 127 thousand, recognised following the acquisition of 65% of the share capital in September 2021 by the subsidiary Pitagora S.p.A. and the completion of the purchase price allocation process pursuant to IFRS 3 - Business Combinations, was tested for impairment. In continuity and in line with the internal reporting system, this goodwill is allocated to the CGU corresponding to the equity investment in We Finance S.p.A.

In relation to what is established in IAS 36 and the considerations set forth above, the impairment test on the above-mentioned goodwill called for the performance of the following activities, also carried out with the assistance of a major consultancy firm:

- Determination of the carrying value of the CGU;
- Determination of the recoverable amount of the CGU and comparison with the carrying value.

2. Determination of the carrying value of the CGU

As at 31 December 2024, the carrying value of the CGU was equal to € 3.2 million and was determined on the basis of the sum of:

- Shareholders' equity of We Finance as at 31 December 2024 equal to € 3.0 million;
- Goodwill equal to € 0.1 million. For the purposes of the impairment test, this goodwill was then grossed up, thus reaching a value of € 0.2 million. As set forth in IAS 36, this step is necessary in order to make the carrying amount consistent with the recoverable amount (both referring to 100% of the CGU).

3. Determination of the recoverable amount of the CGU and comparison with the carrying value

Fair Value

Pursuant to IFRS 13, the fair value represents the price that would be received for the sale of an asset or which would be paid for the transfer of a liability in an orderly transaction between market participants at the valuation date.

For the purposes of estimating the recoverable amount, the following elements were taken into consideration:

- The acquisition of a 65% stake in the share capital of We Finance by the CR Asti Group through Pitagora, represents a recent transaction, having been completed on 28 September 2021;
- During 2022, a further acquisition of 10% of the share capital of We Finance was carried out by Pitagora;
- In addition, in 2023, Pitagora increased its shareholding by 1.2% following the subscription of the unexercised option during the capital increase in the year;
- In addition, in October 2024, Pitagora acquired the stake originally held by the shareholder Directafin S.p.A. and the transfer of a stake representing



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

16% of the capital of We Finance by the shareholder Requist S.r.l. to Pitagora was formalised. To date, therefore, the body of shareholders of the company is represented as follows: Pitagora S.p.A. with 94.0% and Requist S.r.l. with 6.0%.

Value in Use

The value in use was estimated by applying the "Excess Capital" version of the Dividend Discount Model (DDM) method.

The DDM method was developed on the basis of the balance sheet as at 31 December 2024 and the economic, equity and financial projections approved by the Board of Directors of Banca di Asti on 6 February 2025.

The CGU's value in use was determined by discounting future distributable cash flows, based on the following formula:

$$W = \sum_{i=1}^n \frac{D_i}{(1 + Ke)^i} + \frac{TV}{(1 + Ke)^n}$$

where:

W = Value in use

D_i = Potentially distributable dividend in the i-th explicit planning period

Ke = Discount rate represented by the cost of equity

n = Explicit projection period (expressed in number of years)

TV = Terminal Value at the end of the explicit planning period

Dividends potentially distributable in the projection period

The potentially distributable dividend flows were defined on the basis of the financial position as at 31 December 2024 and the 2025-2029 financial and economic projections.

In the development of the distributable flows, a capital absorption equivalent to a minimum capital level of € 2.0 million was considered, in line with the current Supervisory Authority provisions for financial entities like We Finance.

Cost of equity

The cost of equity, equal to 11.07% (11.45% as at 31 December 2023), was estimated on the basis of the Capital Asset Pricing Model (CAPM), considering:

- rate of return on risk-free investments, estimated at 3.64% (4.18% as at 31 December 2023), equal to the average annual yield of BTPs with a ten-year maturity;
- beta, correlation factor between the actual return on a share and the total return on the reference market, assumed to be 1.238 (1.212 as at 31 December 2023) on the basis of the average coefficient reported on a sample of companies operating in the reference market (average surveys at 5 years, monthly);
- *market risk premium*, equal to 6.0% (6.0% as at 31 December 2023), in line with valuation practice in the Italian market.



Terminal value

The terminal value was determined by considering:

- the potentially distributable dividend at the end of the plan horizon taking into account the capital requirements considered;
- the long-term growth rate, assumed to be 2.0%, in consideration of long-term inflation expectations.

Sensitivity analysis

A sensitivity analysis was developed on the values obtained in reaction to changes in the value of:

- the cost of equity (+/- 0.50%),
- the long-term growth rate (+/- 0.50%),
- the expected result at the end of the projection period (+/- 10.0%).

The development of the DDM method on the basis of the approach described leads to the estimate of an average recoverable amount of € 6.3 million, against the carrying amount of the We Finance S.p.A. CGU in the consolidated financial statements equal to € 3.1 million and the equity investment in the separate financial statements equal to € 4.5 million (100%).

The limit parameters which, individually considered, lead to a recoverable amount corresponding to the carrying amount are:

	Parameters/amounts used	"Limit" parameters/amounts
		Consolidated CGU
Cost of capital (ke)	11.07%	21.31% (+10.24%)
Long-term growth rate (g)	2.00%	Negative/not significant
Net profit of Terminal value (TV)	€ 0.7 million	€ 0.2 million (-69.5%)

In light of the results obtained, the impairment test on goodwill allocated to the We Finance CGU in the consolidated financial statements of CR Asti was positively passed, and the sensitivity analyses performed determined a range between Euro 3.1 million and Euro 6.3 million.



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

10.2 INTANGIBLE ASSETS: ANNUAL CHANGES	Goodwill	Other intangible assets: generated internally		Other intangible assets: other		Total 2024
		DEF	INDEF	DEF	INDEF	
A. Opening balance	66,269	0	0	79,751	0	146,020
A.1 Total net decreases	0	0	0	62,263	0	62,263
A.2 Net opening balance	66,269	0	0	17,488	0	83,757
B. Increases	0	0	0	5,763	0	5,763
B.1 Purchases	0	0	0	5,762	0	5,762
B.2 Increases of internally generated intangible assets	X	0	0	0	0	0
B.3 Recoveries	X	0	0	0	0	0
B.4 Increases in fair value	0	0	0	0	0	0
- shareholders' equity	X	0	0	0	0	0
- income statement	X	0	0	0	0	0
B.5 Positive exchange differences	0	0	0	0	0	0
B.6 Other changes	0	0	0	1	0	1
C. Decreases	0	0	0	7,493	0	7,493
C.1 Sales	0	0	0	0	0	0
C.2 Value adjustments	0	0	0	7,493	0	7,493
- Amortisation	X	0	0	7,493	0	7,493
- Write-downs	0	0	0	0	0	0
+ shareholders' equity	X	0	0	0	0	0
+ income statement	0	0	0	0	0	0
C.3 Decreases in fair value:	0	0	0	0	0	0
- shareholders' equity	X	0	0	0	0	0
- income statement	X	0	0	0	0	0
C.4 Transfers to non-current assets held for sale	0	0	0	0	0	0
C.5 Negative exchange differences	0	0	0	0	0	0
C.6 Other changes	0	0	0	0	0	0
D. Net closing balance	66,269	0	0	15,758	0	82,027
D.1 Total net value adjustments	0	0	0	69,680	0	69,680
E. Gross closing balance	66,269	0	0	85,438	0	151,707
F. Carried at cost	0	0	0	0	0	0

Key

DEF: finite life

INDEF: indefinite life

The cost valuation criterion is used for all asset classes.

Items A.1 and D.1 "Total net decreases" include the sum of amortisation plus the impairment losses recognised to align the carrying amount of the assets with their recoverable amount.

**SECTION 11 – TAX ASSETS AND LIABILITIES - ITEM 110 (ASSETS) AND
ITEM 60 (LIABILITIES)**

11.1 Deferred tax assets: breakdown

Deferred tax assets were recognised as there is reasonable certainty of the future presence of taxable income capable of absorbing the recovery of taxes. The item consists entirely of IRES credits (€ 187,187 thousand, at a rate of 27.5% ⁽¹⁾) and IRAP



credits (€ 29,670 thousand, at a rate of 5.57%) shown in the balance sheet as an offset to deferred tax liabilities. Reference should be made to the specific paragraph at the end of this section for details of the Probability Test.

The breakdown of this item is as follows:

11.1 DEFERRED TAX ASSETS: BREAKDOWN	Total 2024	Total 2023
- With offsetting entry in profit or loss	201,624	233,193
- With offsetting entry in shareholders' equity	15,233	30,787
Total	216,857	263,980

11.2 Deferred tax liabilities: breakdown

Deferred tax liabilities were recognised including the taxable temporary differences. The item consists entirely of payables for IRES (€ 62,116 thousand, tax rate of 27.5% ⁽¹⁾) and IRAP (€ 12,448 thousand, tax rate of 5.57%) presented in the balance sheet as an offset against deferred tax assets.

The breakdown of this item is as follows:

11.2 DEFERRED TAX LIABILITIES: BREAKDOWN	Total 2024	Total 2023
- With offsetting entry in profit or loss	58,977	53,597
- With offsetting entry in shareholders' equity	15,587	29,186
Total	74,564	82,783

- (1) The IRES rate consists of the combination represented by the new IRES rate of 24.0% and the additional IRES rate of 3.5% borne by credit and financial institutions, provisions in force as of the date of 1 January 2017 pursuant to Italian Law 208 of 28 December 2015 (2016 Stability Law).



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

11.3 Deferred tax assets: annual changes (with offsetting entry to profit or loss)

11.3 DEFERRED TAX ASSETS: ANNUAL CHANGES (WITH OFFSETTING ENTRY TO PROFIT OR LOSS)	Total 2024	Total 2023
1. Opening balance	233,193	245,256
2. Increases	32,734	44,515
2.1 Deferred tax assets recognised during the year	21,875	30,207
a) relating to previous years	0	200
b) due to change in accounting principles	0	0
c) write-backs	6,653	0
d) other	15,222	30,007
2.2 New taxes or increases in tax rates	0	0
2.3 Other increases	10,859	14,308
3. Decreases	64,303	56,578
3.1 Deferred tax assets derecognised during the year	49,996	50,013
a) reversals	49,996	50,013
b) write-downs of non-recoverable items	0	0
c) change in accounting principles	0	0
d) other	0	0
3.2 Decreases in tax rates	0	0
3.3 Other decreases:	14,307	6,565
a) changes into tax credits pursuant to Law 214/2011	14,307	6,565
b) other	0	0
4. Closing balance	201,624	233,193

Item "2.1. a) relating to previous years" recognises deferred tax assets on receivables write-downs pertaining to the years prior to 2016 to be recovered by 2029.

Item "2.3 Other increases" records the portion of reversals during the year that will be transformed into tax credits arising from the tax loss resulting from filing of the 2025 income tax return.

11.4 Deferred tax assets: changes under Italian Law 214/2011

11.4 DEFERRED TAX ASSETS: CHANGES UNDER LAW 214/2011	Total 2024	Total 2023
1. Opening balance	77,492	95,032
2. Increases	10,858	14,508
3. Decreases	38,549	32,048
3.1 Reversals	24,242	25,483
3.2 Changes into tax credits	14,307	6,565
a) arising from loss for the year	0	0
b) arising from tax losses	14,307	6,565
3.3 Other decreases	0	0
4. Closing balance	49,801	77,492

The item "2. Increases" records for € 10,858 the portion of reversals during the year that will be transformed into tax credits arising from the tax loss resulting from filing of the 2025 income tax return.



11.5 Deferred tax liabilities: annual changes (with offsetting entry in profit or loss)

11.5 DEFERRED TAX LIABILITIES: ANNUAL CHANGES (WITH OFFSETTING ENTRY IN PROFIT OR LOSS)	Total 2024	Total 2023
1. Opening balance	53,597	42,179
2. Increases	6,243	11,794
2.1 Deferred tax liabilities recognised during the year	6,243	11,794
a) relating to previous years	0	0
b) due to change in accounting principles	0	0
c) other	6,243	11,794
2.2 New taxes or increases in tax rates	0	0
2.3 Other increases	0	0
3. Decreases	863	376
3.1 Deferred tax liabilities derecognised during the year	863	376
a) reversals	863	376
b) due to change in accounting principles	0	0
c) other	0	0
3.2 Decreases in tax rates	0	0
3.3 Other decreases	0	0
4. Closing balance	58,977	53,597

11.6 Deferred tax assets: annual changes (with offsetting entry in shareholders' equity)

11.6 DEFERRED TAX ASSETS: ANNUAL CHANGES (WITH OFFSETTING ENTRY IN SHAREHOLDERS' EQUITY)	Total 2024	Total 2023
1. Opening balance	30,787	30,647
2. Increases	13,783	29,331
2.1 Deferred tax assets recognised during the year	13,783	29,331
a) relating to previous years	0	0
b) due to change in accounting principles	0	0
c) other	13,783	29,331
2.2 New taxes or increases in tax rates	0	0
2.3 Other increases	0	0
3. Decreases	29,337	29,191
3.1 Deferred tax assets derecognised during the year	29,337	29,191
a) reversals	0	37
b) write-downs of non-recoverable items	0	0
c) changes in accounting principles	0	0
d) other	29,337	29,154
3.2 Decreases in tax rates	0	0
3.3 Other decreases	0	0
4. Closing balance	15,233	30,787



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

11.7 Deferred tax liabilities: annual changes (with offsetting entry in shareholders' equity)

11.7 DEFERRED TAX LIABILITIES: ANNUAL CHANGES (WITH OFFSETTING ENTRY IN SHAREHOLDERS' EQUITY)	Total 2024	Total 2023
1. Opening balance	29,186	18,229
2. Increases	81	12,486
2.1 Deferred tax liabilities recognised during the year	81	12,486
a) relating to previous years	0	0
b) due to change in accounting principles	0	0
c) other	81	12,486
2.2 New taxes or increases in tax rates	0	0
2.3 Other increases	0	0
3. Decreases	13,680	1,529
3.1 Deferred tax liabilities derecognised during the year	13,680	1,529
a) reversals	12,474	172
b) due to change in accounting principles	0	0
c) other	1,206	1,357
3.2 Decreases in tax rates	0	0
3.3 Other decreases	0	0
4. Closing balance	15,587	29,186

11.8 Other information

The reconciliation between the theoretical tax charge and the actual tax charge in the financial statements was shown in part C, section 21.2.

Probability test on deferred taxation

IAS 12 requires the recognition of deferred tax liabilities and assets with the following criteria: 1) taxable temporary differences: a deferred tax liability must be recognised for all taxable temporary differences; 2) deductible temporary differences: a deferred tax asset must be recognised for all deductible temporary differences, if it is likely that taxable income will be realised against which the deductible temporary difference can be used.

The amount of deferred tax assets recognised in the financial statements therefore must be tested every year to verify if there is reasonable certainty of earning future taxable income and therefore the possibility of recovering the deferred tax assets.

With respect to the deferred tax assets recognised amongst the bank's assets, an analysis was performed to verify whether the future profitability forecasts of the Group are such so as to guarantee their reabsorption and thus justify their recognition and maintenance in the financial statements ("probability test"). The calculation made showed a sufficient taxable base capable of absorbing the deferred taxes recognised in the financial statements as at 31 December 2024.

SECTION 12 – NON-CURRENT ASSETS HELD FOR SALE AND DISCONTINUED OPERATIONS AND ASSOCIATED LIABILITIES - ITEM 120 (ASSETS) AND 70 (LIABILITIES)



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

12.1 NON-CURRENT ASSETS HELD FOR SALE AND DISCONTINUED OPERATIONS: BREAKDOWN BY TYPE OF ASSETS	Total 2024	Total 2023
A. Assets held for sale		
A.1. Financial assets	0	0
A.2 Equity investments	0	0
A.3 Property, plant and equipment	2,375	2,375
of which: obtained by enforcing guarantees received	0	0
A.4 Intangible assets	0	0
A.5 Other non-current assets	0	0
Total (A)	2,375	2,375
of which: valued at cost	2,375	2,375
of which: measured at fair value level 1	0	0
of which: measured at fair value level 2	0	0
of which: measured at fair value level 3	2,375	2,375
B. Discontinued operations		
B.1 Financial assets measured at fair value through profit or loss	0	0
- financial assets held for trading	0	0
- financial assets designated at fair value	0	0
- other financial assets mandatorily measured at fair value	0	0
B.2 Financial assets measured at fair value through other comprehensive income	0	0
B.3 Financial assets measured at amortised cost	0	0
B.4 Equity investments	0	0
B.5 Property, plant and equipment	0	0
of which: obtained by enforcing guarantees received	0	0
B.6 Intangible assets	0	0
B.7 Other assets	0	0
Total (B)	0	0
of which: valued at cost	0	0
of which: measured at fair value level 1	0	0
of which: measured at fair value level 2	0	0
of which: measured at fair value level 3	0	0
C. Liabilities associated with assets held for sale		
C.1 Payables	0	0
C.2 Securities	0	0
C.3 Other liabilities	0	0
Total (C)	0	0
of which: valued at cost	0	0
of which: measured at fair value level 1	0	0
of which: measured at fair value level 2	0	0
of which: measured at fair value level 3	0	0
D. Liabilities associated with discontinued operations		
D.1 Financial liabilities measured at amortised cost	0	0
D.2 Financial liabilities held for trading	0	0
D.3 Financial liabilities designated at fair value	0	0
D.4 Provisions	0	0
D.5 Other liabilities	0	0
Total (D)	0	0
of which: valued at cost	0	0
of which: measured at fair value level 1	0	0
of which: measured at fair value level 2	0	0
of which: measured at fair value level 3	0	0



PART B
INFORMATION ON THE
CONSOLIDATED BALANCE
SHEET ASSETS

The balance of the item “non-current assets held for sale and discontinued operations”, equal to € 2,375 thousand, refers to the land owned by Immobiliare Maristella S.r.l., for which preliminary sales contracts were signed at the reporting date.

SECTION 13 – OTHER ASSETS - ITEM 130

13.1 OTHER ASSETS: BREAKDOWN	Total 2024	Total 2023
- loans to SPV	269,209	276,556
- tax receivables	221,339	223,399
- charges relating to payment systems in the course of execution	53,346	70,673
- indirect taxes and duties	77,528	62,271
- receivable for contribution of business branch	0	37,000
- residual prepayments	28,740	28,385
- amounts to be charged to banks	35,802	21,999
- other amounts to be recovered from customers	17,411	18,724
- residual accrued income	15,623	15,750
- receivables for the provision of non-financial services	33,186	14,441
- costs for setting up leased premises	1,739	2,750
- unpaid notes and cheques	241	1,146
- gold, silver and precious metals	408	445
- transit items	97	52
- other items	12,155	8,190
Total	793,824	781,781

The item “loans to SPV securitisations” includes the Bank's receivables from the special purpose vehicles against securitisation transactions for which it subscribed all securities issued by the SPVs. The securitised loans are recognised under assets in the financial statements.

The item "tax credits" includes the tax credits related to Decree-Law n.18/2020 (c.d. Cura Italia) and n. 34/2020 (cd. Rilancio) purchased by the parent and held for the purpose of offsetting cash flows as detailed in Part A of the accounting policies.

For a more detailed disclosure on securitisation transactions, please refer to the specific section of part E.



SECTION 1 – FINANCIAL LIABILITIES MEASURED AT AMORTISED COST - ITEM 10

1.1 FINANCIAL LIABILITIES MEASURED AT AMORTISED COST: BREAKDOWN BY TYPE OF DEPOSITS FROM BANKS Type of transaction/Amounts	Total 2024				Total 2023			
	Book value	Fair Value			BV	Fair Value		
		L1	L2	L3		L1	L2	L3
1. Deposits from central banks	0	X	X	X	513,576	X	X	X
2. Deposits from banks	710,930	X	X	X	251,620	X	X	X
2.1 Current accounts and demand deposits	8,522	X	X	X	11,630	X	X	X
2.2 Time deposits	0	X	X	X	0	X	X	X
2.3 Loans	679,826	X	X	X	226,994	X	X	X
2.3.1 Repurchase agreements	629,622	X	X	X	226,994	X	X	X
2.3.2 Other	50,204	X	X	X	0	X	X	X
2.4 Liabilities for commitments to repurchase own equity instruments	0	X	X	X	0	X	X	X
2.5 Lease liabilities	2,099	X	X	X	2,470	X	X	X
2.6 Other liabilities	20,483	X	X	X	10,526	X	X	X
Total	710,930	0	0	710,930	765,196	0	0	765,134

Key:

L1 = Level 1

L2 = Level 2

L3 = Level 3

The item "Loans: Other" represents the amount of loans payable as at 31 December 2024 with EIB - European Investment Bank.

The item "Other payables" mainly includes operating payables related to financial services for € 165 thousand and the guarantee deposit placed as guarantee for derivative contracts for € 2,128 thousand.

1.2 FINANCIAL LIABILITIES MEASURED AT AMORTISED COST: BREAKDOWN BY TYPE OF DEPOSITS FROM CUSTOMERS Type of transaction/Amounts	Total 2024				Total 2023			
	Book value	Fair Value			BV	Fair Value		
		L1	L2	L3		L1	L2	L3
1. Current accounts and demand deposits	6,655,894	X	X	X	6,644,870	X	X	X
2. Time deposits	1,336,122	X	X	X	1,028,999	X	X	X
3. Loans	49,694	X	X	X	42,631	X	X	X
3.1 Repurchase agreements	49,694	X	X	X	42,631	X	X	X
3.2 Other	0	X	X	X	0	X	X	X
4. Liabilities for commitments to repurchase own equity instruments	0	X	X	X	0	X	X	X
5. Lease liabilities	36,467	X	X	X	38,419	X	X	X
6. Other liabilities	1,565,643	X	X	X	1,454,463	X	X	X
Total	9,643,820	0	0	8,333,621	9,209,382	0	0	8,101,621

Key:

L1 = Level 1

L2 = Level 2

L3 = Level 3



PART B
INFORMATION ON THE
CONSOLIDATED
BALANCE SHEET
LIABILITIES

The item “Other liabilities” includes € 1,525,305 thousand for payables linked to securitisation transactions.

1.3 FINANCIAL LIABILITIES MEASURED AT AMORTISED COST: BREAKDOWN BY TYPE OF DEBT SECURITIES IN ISSUE Type of security/Amounts	Total 2024				Total 2023			
	Book value	Fair Value			BV	Fair Value		
		L1	L2	L3		L1	L2	L3
A. Securities	1,017,895	0	988,943	0	1,176,262	0	1,127,779	0
1. Bonds	1,017,895	0	988,943	0	1,176,262	0	1,127,779	0
1.1 structured	0	0	0	0	0	0	0	0
1.2 other	1,017,895	0	988,943	0	1,176,262	0	1,127,779	0
2. Other securities	0	0	0	0	0	0	0	0
2.1 structured	0	0	0	0	0	0	0	0
2.2 other	0	0	0	0	0	0	0	0
Total	1,017,895	0	988,943	0	1,176,262	0	1,127,779	0

Key:

L1 = Level 1

L2 = Level 2

L3 = Level 3

The fair value of bonds is indicated at the clean price, with the exception of zero coupon bonds.

1.4 Details of subordinated liabilities/securities

The amount included in the item “Debt securities in issue” is € 179,876 thousand. See Section F for the relative details.

1.6 Lease liabilities

As at 31 December 2024, the Group has outstanding liabilities of € 38.6 million, of which € 6 million maturing within one year, € 18.6 million maturing between 1 and 5 years and € 14 million maturing over 5 years. Lease liabilities refer for € 2.1 million to bank counterparties and for € 36.5 million to customer counterparties.

	Total 2024	Total 2023
Time band	Lease liabilities	
Up to 1 year	6,036	5,779
1 to 5 years	18,549	18,719
Over 5 years	13,981	16,391
Total lease liabilities	38,566	40,889



SECTION 2 – FINANCIAL LIABILITIES HELD FOR TRADING - ITEM 20

2.1 FINANCIAL LIABILITIES HELD FOR TRADING: BREAKDOWN BY TYPE Type of transaction/Amounts	Total 2024					Total 2023				
	NV	Fair Value			Fair Value *	NV	Fair Value			Fair Value *
		L1	L2	L3			L1	L2	L3	
A. Balance sheet liabilities										
1. Deposits from banks	0	0	0	0	0	0	0	0	0	0
2. Deposits from customers	0	0	0	0	0	0	0	0	0	0
3. Debt securities	0	0	0	0	0	0	0	0	0	0
3.1 Bonds	0	0	0	0	0	0	0	0	0	0
3.1.1 Structured	0	0	0	0	X	0	0	0	0	X
3.1.2 Other bonds	0	0	0	0	X	0	0	0	0	X
3.2 Other securities	0	0	0	0	0	0	0	0	0	0
3.2.1 Structured	0	0	0	0	X	0	0	0	0	X
3.2.2 Other	0	0	0	0	X	0	0	0	0	X
Total A	0	0	0	0	0	0	0	0	0	0
B. Derivatives										
1. Financial derivatives	0	0	1,936	0	0	0	0	1,974	0	0
1.1 Trading	X	0	1,936	0	X	X	0	1,940	0	X
1.2 Linked to fair value option	X	0		0	X	X	0	34	0	X
1.3 Other	X	0	0	0	X	X	0	0	0	X
2. Credit derivatives	0	0	0	0	0	0	0	0	0	0
2.1 Trading	X	0	0	0	X	X	0	0	0	X
2.2 Linked to fair value option	X	0	0	0	X	X	0	0	0	X
2.3 Other	X	0	0	0	X	X	0	0	0	X
Total B	X	0	1,936	0	X	X	0	1,974	0	X
Total (A+B)	X	0	1,936	0	X	X	0	1,974	0	X

Key:

NV = Nominal or Notional Value

L1 = Level 1

L2 = Level 2

L3 = Level 3

Fair Value* = Fair value calculated excluding value adjustments due to changes in the creditworthiness of the issuer since the date of issue.

The item "Financial trading derivatives - Level 2" includes the fair value measurement of the 'operational hedge' derivative contracts for an amount of € 1,906 thousand, of which € 1,140 thousand relates to securitisation transactions.

PART B
INFORMATION ON THE
CONSOLIDATED
BALANCE SHEET
LIABILITIES



SECTION 3 – FINANCIAL LIABILITIES DESIGNATED AT FAIR VALUE -
ITEM 30

3.1 FINANCIAL LIABILITIES DESIGNATED AT FAIR VALUE: BREAKDOWN BY TYPE Type of transaction/Amounts	Total 2024					Total 2023				
	NV	Fair value			Fair Value *	NV	Fair value			Fair Value *
		L1	L2	L3			L1	L2	L3	
1. Deposits from banks	0	0	0	0	0	0	0	0	0	0
1.1 Structured	0	0	0	0	X	0	0	0	0	X
1.2 Other	0	0	0	0	X	0	0	0	0	X
of which:										
- commitments to disburse funds	0	X	X	X	X	0	X	X	X	X
- financial guarantees given	0	X	X	X	X	0	X	X	X	X
2. Deposits from customers	0	0	0	0	0	0	0	0	0	0
2.1 Structured	0	0	0	0	X	0	0	0	0	X
2.2 Other	0	0	0	0	X	0	0	0	0	X
of which:										
- commitments to disburse funds	0	X	X	X	X	0	X	X	X	X
- financial guarantees given	0	X	X	X	X	0	X	X	X	X
3. Debt securities	12,297	0	12,496	0	12,496	12,540	0	12,768	0	12,768
3.1 Structured	0	0	0	0	X	0	0	0	0	X
3.2 Other	12,297	0	12,496	0	X	12,540	0	12,768	0	X
Total	12,297	0	12,496	0	12,496	12,540	0	12,768	0	12,768

Key:

NV = Nominal or Notional Value

L1 = Level 1

L2 = Level 2

L3 = Level 3

Fair Value* = Fair value calculated excluding value adjustments due to changes in the creditworthiness of the issuer since the date of issue.

The classification in “Financial liabilities measured at fair value” of part of the bonds issued was due to the desire to optimise the management of interest rate risk, while also reducing valuation discrepancies between assets and liabilities in relation to the accounting mismatch, in line with what is defined by the Group Policy.



SECTION 4 – HEDGING DERIVATIVES - ITEM 40

4.1 HEDGING DERIVATIVES: BREAKDOWN BY HEDGING TYPE AND UNDERLYING ASSET	NV 2024	Fair value 2024			NV 2023	Fair value 2023		
		L1	L2	L3		L1	L2	L3
A. Financial derivatives	1,879,279	0	79,531	0	2,141,832	0	112,954	0
1) Fair value	1,815,000	0	75,021	0	2,065,000	0	107,795	0
2) Cash flows	64,279	0	4,510	0	76,832	0	5,159	0
3) Foreign investments	0	0	0	0	0	0	0	0
B. Credit derivatives	0	0	0	0	0	0	0	0
1) Fair value	0	0	0	0	0	0	0	0
2) Cash flows	0	0	0	0	0	0	0	0
Total	1,879,279	0	79,531	0	2,141,832	0	112,954	0

Key:

NV = Notional value

L1 = Level 1

L2 = Level 2

L3 = Level 3

The value of € 4,510 thousand recognised in the Liability sub-item "1. Financial liabilities" refers to the negative value of derivatives taken out to hedge cash flows (cash flow hedges) the objective of which is to stabilise the flow of interest of variable rate funding, to the extent to which the latter finances fixed rate loans to customers.

As the latter are recognised at amortised cost in the financial statements, the relative capital gain is not shown in the accounts.

4.2 HEDGING DERIVATIVES: BREAKDOWN BY PORTFOLIOS HEDGED AND BY HEDGING TYPE	Fair Value							Cash flows		Foreign investments
	Micro-hedge						Macro-hedge	Micro-hedge	Macro-hedge	
	Debt securities and interest rates	Equity securities and stock indices	Currencies and gold	Credit	Commodities	Other				
Transaction/Type of hedge										
1. Financial assets measured at fair value through other comprehensive income	17,214	0	0	0	X	X	X	0	X	X
2. Financial assets measured at amortised cost	57,807	X	0	0	X	X	X	0	X	X
3. Portfolio	X	X	X	X	X	X	0	X	0	X
4. Other transactions	0	0	0	0	0	0	X	0	X	0
Total assets	75,021	0	0	0	0	0	0	0	0	0
1. Financial liabilities	0	X	0	0	0	0	X	4,510	X	X
2. Portfolio	X	X	X	X	X	X	0	X	0	X
Total liabilities	0	0	0	0	0	0	0	4,510	0	0
1. Expected transactions	X	X	X	X	X	X	X	0	X	X
2. Financial assets and liabilities portfolio	X	X	X	X	X	X	0	X	0	0



PART B
INFORMATION ON THE
CONSOLIDATED
BALANCE SHEET
LIABILITIES

SECTION 5 – CHANGE IN VALUE OF MACRO-HEDGED FINANCIAL LIABILITIES - ITEM 50

There are no items of this type.

SECTION 6 – TAX LIABILITIES - ITEM 60

See Section 11 of the Assets.

SECTION 7 – LIABILITIES ASSOCIATED WITH ASSETS CLASSIFIED AS HELD FOR SALE - ITEM 70

There are no items of this type.

SECTION 8 – OTHER LIABILITIES - ITEM 80

8.1 OTHER LIABILITIES: BREAKDOWN	Total 2024	Total 2023
- imbalance of adjustments on the notes portfolios	99,409	55,304
- credits relating to payment systems in the course of execution	71,291	87,358
- amounts to be credited to banks	9,419	6,526
- operating payables not connected to financial services	43,624	22,689
- amounts to be paid to the tax authorities on behalf of third parties	45,024	30,496
- amounts to be paid to personnel	9,312	9,139
- payables to SPV	19,161	17,982
- amounts to be recognised to customers	24,742	24,287
- residual deferred income	3,261	2,587
- amounts to be recognised to various institutions	6,120	6,478
- insurance premiums collected in the course of processing and to be paid back to companies	1,023	1,575
- other tax liabilities	1,698	565
- residual accrued liabilities	957	921
- other items	7,949	7,210
Total	342,990	273,117

The change in the item “Other liabilities” is mainly due to the “imbalance of adjustments on the notes portfolios” relating to the treatment of notes received and sent subject to collection or after collection and to “Operating payables not related to financial services” relating to accrued revenues arising during the financial year and still to be settled.



SECTION 9 – PROVISION FOR EMPLOYEE SEVERANCE PAY - ITEM 90

9.1 PROVISION FOR EMPLOYEE SEVERANCE PAY: ANNUAL CHANGES	Total 2024	Total 2023
A. Opening balance	13,656	14,116
B. Increases	503	527
B.1 Provisions for the year	377	509
B.2 Other changes	126	18
C. Decreases	(467)	(987)
C.1 Severance payments	(460)	(666)
C.2 Other changes	(7)	(321)
D. Closing balance	13,692	13,656
Total	13,692	13,656

According to statutory regulations, as at 31 December 2024, the provision for employee severance pay amounted to € 13,950 thousand.

In application of the international accounting standards, the employee severance pay provision is classified as a defined benefit provision, therefore subject to actuarial valuation, the assumptions of which are explained in the following paragraph.

9.2 Other information

The actuarial assumptions used by the independent actuary to determine the liabilities at the reporting date are as follows:

CURRENT DEMOGRAPHIC ASSUMPTIONS	Balances as at 2024
	Employee severance pay
Mortality rate	IPS55 tables
Disability rates	INPS-2000 tables

BANCA DI ASTI ACTUARIAL ASSUMPTIONS	Balances as at 2024
	Employee severance pay
Demographic assumptions	
Average annual personnel turnover rate	7.19%
Annual probability of request for advance	0.00%
Minimum retirement age	According to the latest legislative provisions
Mortality tables	IPS 55
Financial and economic assumptions	
Discount rate	2.85%
Expected rate of wage increase	1.75%
Inflation rate	1.90%
Percentage of severance pay requested in advance	0.00%

BANCA DI ASTI Sensitivity analysis	Sensitivity	Employee severance pay	Non-compete agreements
Discount rate	0.50%	13,333	732
	-0.50%	13,907	784



PART B
INFORMATION ON THE
CONSOLIDATED
BALANCE SHEET
LIABILITIES

ACTUARIAL ASSUMPTIONS PITAGORA S.P.A. - WE FINANCE S.P.A.	Balances as at 2024	
	Employee severance pay	
	Pitagora S.p.A.	We Finance S.p.A.
Demographic assumptions		
Mortality rate	IPS55 tables	IPS55 tables
Disability rates	INPS-2000 tables	INPS-2000 tables
Personnel turnover rate	3.00%	3.00%
Advances rate	2.00%	2.00%
Financial and economic assumptions		
Discount rate	3.18%	3.38%
Annual inflation rate	2.50%	2.50%

Sensitivity analysis PITAGORA S.P.A. - WE FINANCE S.P.A.	Sensitivity	Employee severance pay	
		Pitagora S.p.A.	We Finance S.p.A.
Discount rate	0.50%	32	43
	-0.50%	34	48

Assets and liabilities recognised	Balances as at 2024	
	Employee severance pay	
Present value of defined benefit obligations	13,692	

Changes in the present value of defined benefit obligations during the year	Employee severance pay	
	Balances as at 2024	Balances as at 2023
Opening balance	13,656	14,116
Financial income/expenses	422	490
Social security cost for service	5	13
Indemnities paid	-458	-666
Actuarial gains/losses	67	-297
Closing balance	13,692	13,656

SECTION 10 – PROVISIONS FOR RISKS AND CHARGES - ITEM 100

10.1 PROVISIONS FOR RISKS AND CHARGES: BREAKDOWN Items	Total 2024	Total 2023
1. Provisions for credit risk relating to commitments and financial guarantees given	8,216	4,972
2. Provisions on other commitments and other guarantees given	0	0
3. Pensions and other post-retirement benefit obligations	0	0
4. Other provisions for risks and charges	30,866	27,466
4.1 legal and tax disputes	4,304	4,899
4.2 personnel charges	5,984	6,465
4.3 other	20,578	16,102
Total	39,082	32,438



For the purposes of consistency with the year 2024, for the year 2023 the provision relating to tax disputes was restated under item "4.1 legal and tax disputes".

10.2 PROVISIONS FOR RISKS AND CHARGES: ANNUAL CHANGES	Provisions on other commitments and other guarantees given	Pensions and other post- retirement benefit obligations	Other provisions for risks and charges	Total
A. Opening balance	0	0	27,466	27,466
B. Increases	0	0	20,692	20,692
B.1 Provision for the year	0	0	20,534	20,534
B.2 Changes due to the time value of money	0	0	0	0
B.3 Difference due to discount-rate changes	0	0	0	0
B.4 Other changes	0	0	158	158
C. Decreases	0	0	17,292	17,292
C.1 Use during the year	0	0	16,551	16,551
C.2 Difference due to discount rate changes	0	0	0	0
C.3 Other changes	0	0	741	741
D. Closing balance	0	0	30,866	30,866

Item B.1 "Provisions for the year" for "Other Provisions" refers for € 6,6 thousand mainly to prudential provisions estimated against potential commission refunds to customers in relation to issues that arose during the Bank of Italy inspection that ended in October 2024, for € 10,236 thousand mainly to future charges for potential refunds to be made to customers in the event of early extinctions and to future charges referring to the potential reimbursement of the price spread on practices transferred without recourse where this is contractually provided for.

Item C.1 "Use during the year" includes € 4,002 thousand mainly for utilisations made against payments of personnel expenses and amounts deriving from the settlement of revocatory actions and legal disputes for which specific provisions had been set aside, € 11,456 thousand mainly for utilisations made against the payment of charges for refunds made to customers following early repayments and the reimbursement of the price spread on cases transferred without recourse, and utilisations made against payments for agents' termination indemnity.

Item C.3 "Other changes", equal to € 741 thousand, of the other provisions for risks and charges is mainly attributable to recoveries relating to other provisions (included in item 170 b) "Net allocations to provisions for risks and charges – other net provisions").

10.3 PROVISIONS FOR CREDIT RISK RELATING TO COMMITMENTS AND FINANCIAL GUARANTEES GIVEN	Provisions for credit risk relating to commitments and financial guarantees given				Total
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	
Commitments to disburse funds	433	170	0	0	603
Financial guarantees given	177	244	7,192	0	7,613
Total	610	414	7,192	0	8,216

10.6 PROVISIONS FOR RISKS AND CHARGES - OTHER PROVISIONS

The item 2.3 "Other provisions for risks and charges - other" in table 10.1 "Provisions for risks and charges: breakdown" includes the following provisions:



PART B
INFORMATION ON THE
CONSOLIDATED
BALANCE SHEET
LIABILITIES

10.6 PROVISIONS FOR RISKS AND CHARGES: OTHER PROVISIONS	Total 2024	Total 2023
Provision for risks on claw-backs	446	992
Other provisions for risks and charges	20,132	15,110
Total	20,578	16,102

For the purposes of consistency with the year 2024, for the year 2023 the provision relating to tax disputes was restated under item "4.1 legal and tax disputes".

The other provisions for risks and charges are mainly represented by:

- future expenses for potential compensation to be provided to customers in the case of early terminations for € 2,838 thousand. This provision was allocated in anticipation of potential future charges in relation to the regulations regarding early repayment of the loan;
- future charges for collection commissions to be paid to INPS, equal to € 4,373 thousand;
- future charges referring to potential repayment of the price spread on cases transferred without recourse, attributable to the difference between the discounting of the transfer price with respect to the TAN applied to customers, following early repayment and charges for fraud; the provision as at 31 December 2024 amounted to € 5,418 thousand.

SECTION 11 – TECHNICAL RESERVES - ITEM 110

There are no items of this type.

SECTION 12 – REDEEMABLE SHARES - ITEM 130

There are no items of this type.

SECTION 13 – GROUP EQUITY - ITEMS 120, 130, 140, 150, 160, 170 AND 180.

13.1 “SHARE CAPITAL” AND “TREASURY SHARES”: BREAKDOWN

As at 31 December 2024, the Parent Company's share capital amounted to € 363,971 thousand, broken down into 70,537,048 ordinary shares with a nominal value of € 5.16.

As at 31 December 2024, the Parent Company held 355,922 treasury shares in its portfolio, recorded in the financial statements at a cost of € 8.45983 each, equal to a total of € 3,011 thousand.



13.2 SHARE CAPITAL – NUMBER OF SHARES: ANNUAL CHANGES		
Item/Type	Ordinary	Other
A. Shares outstanding as at the beginning of the period	70,537,048	0
- fully released	70,537,048	0
- not fully released	0	0
A.1 Treasury shares (-)	1,128,532	0
A.2 Shares outstanding: opening balance	69,408,516	0
B. Increases	4,232,223	0
B.1 New issues	0	0
- against payment:	0	0
- business combinations	0	0
- bonds converted	0	0
- warrants exercised	0	0
- other	0	0
- without payment:	0	0
- to employees	0	0
- to Directors	0	0
- other	0	0
B.2 Sale of treasury shares	4,232,223	0
B.3 Other changes	0	0
C. Decreases	3,461,723	0
C.1 Cancellation	0	0
C.2 Purchase of treasury shares	3,461,723	0
C.3 Business transferred	0	0
C.4 Other changes	0	0
D. Shares outstanding: closing balance	70,179,016	0
D.1 Treasury shares (+)	358,032	0
D.2 Shares outstanding as at the end of the year	70,537,048	0
- fully released	70,537,048	0
- not fully released	0	0

The purchase and sale of treasury shares in 2024 reduced the specific reserve, included in the share premiums, by € 3,143 thousand.



PART B
INFORMATION ON THE
CONSOLIDATED
BALANCE SHEET
LIABILITIES

13.3 SHARE CAPITAL: OTHER INFORMATION

The share capital consists of 70,537,048 shares broken down as follows:

Shareholder	Number of ordinary shares held	Nominal value	% of share capital
Fondazione Cassa di Risparmio di Asti	22,427,913	115,728,031	31.80%
Fondazione Cassa di Risparmio di Biella	9,103,033	46,971,650	12.91%
Banco BPM Società per Azioni	7,047,884	36,367,081	9.99%
Fondazione CRT	4,232,223	21,838,271	6.00%
Fondazione Cassa di Risparmio di Vercelli	2,959,172	15,269,328	4.20%
Other shareholders	24,408,791	125,949,362	34.60%
Treasury shares	358,032	1,847,445	0.50%
Total	70,537,048	363,971,168	100%

13.4 PROFIT RESERVES: OTHER INFORMATION

Items/Amounts	Total 2024
Legal and statutory reserves	529,667
- <i>legal reserve</i>	38,658
- <i>ordinary reserve</i>	131,565
- <i>extraordinary reserve</i>	361,495
- <i>treasury share dividend reserve</i>	459
- <i>expenses for share capital increase</i>	-2,510
Treasury shares reserve	3,031
Other reserves	-224,892
- <i>consolidation reserve</i>	14,161
- <i>allocation to retained earnings of the provision for general banking risks (as at 31/12/2005)</i>	20,429
- <i>reserves recognised in the transition to IAS/IFRS (FTA)</i>	2,168
- <i>reserves recognised in the transition to IAS/IFRS (2018 FTA)</i>	-237,187
- <i>reserves recognised in the transition to IAS/IFRS (recalculation of profit for the year 2005)</i>	479
- <i>reserves recognised in the transition to IAS/IFRS (modification of 2008 tax rates)</i>	172
- <i>allocation to retained earnings of depreciation of real estate recognised at "deemed cost"</i>	2,341
- <i>recognition in profit reserves of the "Additional Tier" security</i>	-27,455
Total	307,806



13.5 EQUITY INSTRUMENTS: BREAKDOWN AND ANNUAL CHANGES

During the 2024 financial year, Banca di Asti did not carry out new transactions for the issue of Additional Tier1 instruments, therefore there were no changes compared to last year. The consideration received from the issue of AT1 capital instruments in 2021, is represented in item "130 Equity instruments" for a total of € 97.6 million, less transaction costs directly attributable to the issue which, net of tax effect, totalled € 2.4 million. The aggregate principal amount of the coupons paid to subscribers amounted to € 26.8 million as at 31 December 2024, net of tax charges.

SECTION 14 – MINORITY SHAREHOLDERS' EQUITY - ITEM 190

14.1 MINORITY SHAREHOLDERS' EQUITY: BREAKDOWN Items/Amounts	Total 2024
1) Share capital	20,064
2) Share Premium Reserve	0
3) Reserves	6,753
4) (Treasury shares)	0
5) Valuation reserves	143
6) Equity instruments	0
7) Minority profit (loss) for the year	3,527
Total	30,487

DETAILS OF ITEM 190 MINORITY SHAREHOLDERS' EQUITY Company Name	Total 2024	Total 2023
Equity investments with significant minority interests		
1) Pitagora Contro Cessione del Quinto S.p.A.	30,353	24,262
2) We Finance S.p.A.	136	284
Other equity investments	-2	-6
Total	30,487	24,540



PART B
OTHER INFORMATION

OTHER INFORMATION

1. COMMITMENTS AND GUARANTEES GIVEN	Nominal value on commitments and guarantees given				Total 2024	Total 2023
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired		
1. Commitments to disburse funds	1,609,144	29,193	24,318	0	1,662,655	1,526,232
a) Central Banks	0	0	0	0	0	0
b) Public administration	211,978	2,854	0	0	214,832	133,760
c) Banks	3,568	0	0	0	3,568	4,046
d) Other financial companies	47,875	31	0	0	47,906	40,296
e) Non-financial companies	1,172,547	22,100	23,402	0	1,218,049	1,151,829
f) Households	173,176	4,208	916	0	178,300	196,301
2. Financial guarantees given	39,753	518	905	0	41,176	41,860
a) Central Banks	0	0	0	0	0	0
b) Public administration	23	0	0	0	23	22
c) Banks	24,828	0	0	0	24,828	23,475
d) Other financial companies	229	0	0	0	229	226
e) Non-financial companies	7,153	467	903	0	8,523	9,086
f) Households	7,520	51	2	0	7,573	9,051

2. OTHER COMMITMENTS AND OTHER GUARANTEES GIVEN	Nominal value	
	Total 2024	Total 2023
Other guarantees given	104,463	111,528
of which: non-performing credit exposures	7,799	3,563
a) Central Banks	0	0
b) Public administration	573	598
c) Banks	0	0
d) Other financial companies	2,155	2,347
e) Non-financial companies	92,348	97,520
f) Households	9,387	10,572
Other commitments	0	0
of which: non-performing credit exposures	0	0
a) Central Banks	0	0
b) Public administration	0	0
c) Banks	0	0
d) Other financial companies	0	0
e) Non-financial companies	0	0
f) Households	0	0



3. ASSETS PLEDGED AS COLLATERAL ON OWN LIABILITIES AND COMMITMENTS	Amount 2024	Amount 2023
Portfolios		
1. Financial assets measured at fair value through profit or loss	0	0
2. Financial assets measured at fair value through other comprehensive income	6,519	77,262
3. Financial assets measured at amortised cost	160,278	82,392
4. Property, plant and equipment	0	0
of which: property, plant and equipment considered inventory	0	0

Assets were set up to guarantee the following transactions:

- as security for bankers' drafts € 16,229 thousand;
- to guarantee transactions in non-over-the-counter derivatives € 19,650 thousand;
- to guarantee transactions carried out with CCG € 65,129 thousand;
- transactions in repurchase agreements € 52,746 thousand;
- to guarantee EIB loan transactions € 71,653 thousand.

5. ASSET MANAGEMENT AND TRADING ON BEHALF OF THIRD PARTIES	Amount 2024	Amount 2023
Type of services		
1. Trading on behalf of customers	0	0
a) purchases	0	0
1. settled	0	0
2. unsettled	0	0
b) sales	0	0
1. settled	0	0
2. unsettled	0	0
2. Portfolio management	1,800,826	1,676,255
a) individual	1,800,826	1,676,255
b) collective		0
3. Custody and administration of securities	14,788,608	14,462,610
a) third party securities in deposit: relating to depositary bank activities (excluding asset management)	80	80
1. securities issued by the bank drafting the financial statements	0	0
2. other securities	80	80
b) third party securities in deposit (excluding portfolio management): other	5,310,223	5,070,022
1. securities issued by the bank drafting the financial statements	1,309,879	1,482,438
2. other securities	4,000,344	3,587,584
c) third party securities deposited with third parties	5,223,643	4,957,129
d) own securities deposited with third parties	4,254,662	4,435,379
4. Other transactions	99,010	54,783



PART B OTHER INFORMATION

6. FINANCIAL ASSETS SUBJECT TO OFFSETTING IN THE FINANCIAL STATEMENTS, OR SUBJECT TO MASTER NETTING AGREEMENTS OR SIMILAR AGREEMENTS	Gross amount of financial assets (a)	Amount of financial liabilities offset in the financial statements (b)	Net amount of financial assets reported in the financial statements (c = a-b)	Related amounts not subject to offsetting in the financial statements		Net amount 2024 (f=c-d-e)	Net amount 2023
				Financial instruments (d)	Cash deposits received as collateral (e)		
Instrument type							
1. Derivatives	2,687,084	0	2,687,084	2,687,084	0	0	0
2. Repurchase agreements	0	0	0	0	0	0	0
3. Securities lending	0	0	0	0	0	0	0
4. Other	0	0	0	0	0	0	0
Total 2024	2,687,084	0	2,687,084	2,687,084	0	0	X
Total 2023	2,458,774	0	2,458,774	2,458,774	0	X	0

7. FINANCIAL LIABILITIES SUBJECT TO OFFSETTING IN THE FINANCIAL STATEMENTS, OR SUBJECT TO MASTER NETTING AGREEMENTS OR SIMILAR AGREEMENTS	Gross amount of financial assets (a)	Amount of financial liabilities offset in the financial statements (b)	Net amount of financial assets reported in the financial statements (c = a-b)	Related amounts not subject to offsetting in the financial statements		Net amount 2024 (f=c-d-e)	Net amount 2023
				Financial instruments (d)	Cash deposits received as collateral (e)		
Instrument type							
1. Derivatives	2,768,435	0	2,768,435	2,687,084	0	81,351	95,465
2. Repurchase agreements	0	0	0	0	0	0	0
3. Securities lending	0	0	0	0	0	0	0
4. Other	0	0	0	0	0	0	0
Total 2024	2,768,435	0	2,768,435	2,687,084	0	81,351	X
Total 2023	2,554,239	0	2,554,239	2,458,774	0	X	95,465

7. SECURITIES LENDING TRANSACTIONS

There are no items of this type.

8. INFORMATION ON ASSETS UNDER JOINT CONTROL

There are no items of this type.





PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

SECTION 1 – INTEREST INCOME/EXPENSE AND SIMILAR REVENUES/CHARGES - ITEMS 10 AND 20

1.1 INTEREST INCOME AND SIMILAR REVENUES: BREAKDOWN Item/Type	Debt securities	Loans	Other transactions	Total 2024	Total 2023
1. Financial assets measured at fair value through profit or loss	336	3,679	0	4,015	1,516
1.1 Financial assets held for trading	150	3,679	0	3,829	1,186
1.2 Financial assets designated at fair value	0	0	0	0	0
1.3 Other financial assets mandatorily measured at fair value	186	0	0	186	330
2. Financial assets measured at fair value through other comprehensive income	29,931	534	X	30,465	20,985
3. Financial assets measured at amortised cost	37,313	426,147	X	463,460	458,397
3.1 Loans and advances to banks	0	47,009	X	47,009	62,109
3.2 Loans and advances to customers	37,313	379,138	X	416,451	396,288
4. Hedging derivatives	X	X	14,063	14,063	14,037
5. Other assets	X	X	12,460	12,460	9,043
6. Financial liabilities	X	X	X		0
Total	67,580	430,360	26,523	524,463	503,978
of which: interest income from impaired financial assets	0	1,445	0	1,445	1,123
of which: interest income on finance lease	0	0	0	0	0

The default interest accrued during the year on positions classified as bad loans as at 31 December 2024 amounted to € 2,111 thousand, of which € 30 thousand was collected during the year.

1.2 Interest income and similar revenues: other information

Under "Loans and advances to customers - Loans" € 204,712 thousand is recognised for interest income on securitised mortgages and € 394 thousand for interest income on the securitisation cash reserves.

The item "Financial assets held for trading - Other transactions" consists entirely of spreads on derivative contracts linked to the fair value option.

1.2.1 Interest income from financial assets denominated in foreign currency

Interest income and similar revenues accrued on assets in foreign currency derive from loans to ordinary customers for € 1,346 thousand.



1.3 INTEREST EXPENSE AND SIMILAR CHARGES: BREAKDOWN Item/Type	Payables	Securities	Other transactions	Total 2024	Total 2023
1. Financial liabilities measured at amortised cost	(191,124)	(35,623)	X	(226,747)	(231,733)
1.1 Deposits from central banks	(4,721)	X	X	(4,721)	0
1.2 Deposits from banks	(21,892)	X	X	(21,892)	(8,750)
1.3 Deposits from customers	(164,511)	X	X	(164,511)	(132,630)
1.4 Debt securities in issue	X	(35,623)	X	(35,623)	(33,786)
2. Financial liabilities held for trading	0	0	(64)	(64)	0
3. Financial liabilities designated at fair value	0	(535)	0	(535)	(606)
4. Other liabilities and funds	X	X	(10)	(10)	(13)
5. Hedging derivatives	X	X	0	0	0
6. Financial assets	X	X	X	0	0
Total	(191,124)	(36,158)	(74)	(227,356)	(232,352)
of which: interest expense relating to lease liabilities	(1,032)	0	0	(1,032)	(762)

The item "Deposits from central banks" consists of the application of interest rate expenses on the amount of the total credit facility assigned by the Eurosystem to the Cassa di Risparmio di Asti Group as part of the 'TLTRO III' operation.

The item "Deposits from customers - Payables" includes € 55,494 thousand referring to interest generated by the securitisation transactions and € 21,324 thousand for interest expense for repurchase agreements.

1.4 Interest expense and similar charges: other information

The item "Debt securities in issue" includes interest on subordinated loans for € 7,652 thousand.

1.4.1 Interest expense from liabilities denominated in foreign currency

Interest expenses and similar charges on liabilities denominated in foreign currency are attributable to interest expenses on deposits from ordinary customers in the amount of about € 181 thousand and deposits from credit institutions in the amount of about € 7 thousand, for a total of € 188 thousand.

1.5 SPREADS ON HEDGING TRANSACTIONS Items	Total 2024	Total 2023
A. Positive spreads on hedging transactions:	14,986	17,981
B. Negative spreads on hedging transactions:	(923)	(3,944)
C. Net spread (A-B)	14,063	14,037



PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

SECTION 2 - FEES AND COMMISSION INCOME/EXPENSE - ITEMS 40 AND 50

2.1 FEES AND COMMISSION INCOME: BREAKDOWN	Total	Total
Services/Amounts	2024	2023
a) Financial instruments	56,641	52,001
1. Placement of securities	29,073	26,362
1.1 With underwriting and/or based on an irrevocable commitment	0	0
1.2 Without irrevocable commitment	29,073	26,362
2. Reception and transmission of orders and execution of orders on behalf of customers	2,505	2,298
2.1 Receipt and transmission of orders for one or more financial instruments	2,505	2,298
2.2. Execution of orders on behalf of customers	0	0
3. Other commissions connected with activities related to financial instruments	25,063	23,341
of which: trading on own account	0	0
of which: individual portfolio management	25,063	23,341
b) Corporate Finance	629	621
1. Mergers and acquisitions advisory services	0	0
2. Treasury services	629	621
3. Other commissions associated with corporate finance services	0	0
c) Investment advisory activities	0	0
d) Clearing and settlement	0	0
e) Custody and administration	943	952
1. Custodian bank	0	0
2. Other fees related to custody and administration	943	952
f) Central administrative services for collective portfolio management	0	0
g) Fiduciary activity	0	0
h) Payment services	56,025	57,791
1. Current accounts	30,962	30,173
2. Credit cards	8,961	6,123
3. Debit and other payment cards	4,843	6,017
4. Wire transfers and other payment orders	4,290	4,101
5. Other fees related to payment services	6,969	11,377
i) Distribution of third party services	28,503	29,793
1. Collective portfolio management	0	0
2. Insurance products	24,727	25,915
3. Other products	3,776	3,878
of which: individual portfolio management	0	0
j) Structured finance	0	0
k) Securitisation transaction servicing	3,275	3,288
l) Commitments to disburse funds	0	0
m) Financial guarantees given	1,631	1,730
of which: credit derivatives	0	0
n) Financing operations	77	64
of which: for factoring operations	77	64
o) Currency trading	708	690
p) Goods	0	0
q) Other fee and commission income	31,290	31,024
of which: for management of multilateral trading facilities	0	0
of which: for the management of organised trading systems	0	0
Total	179,722	177,954

Item “q) Other fee and commission income” includes € 10,176 thousand relating to commissions for the provision of sums.



2.2 FEE AND COMMISSION EXPENSE: BREAKDOWN Services/Amounts	Total 2024	Total 2023
a) Financial instruments	(3,192)	(3,082)
of which: trading of financial instruments	(3,192)	(3,082)
of which: placement of financial instruments	0	0
of which: individual portfolio management	0	0
- own	0	0
- delegated to third parties	0	0
b) Clearing and settlement	0	0
c) Collective portfolio management	0	0
1. own	0	0
2. delegated to third parties	0	0
d) Custody and administration	(973)	(646)
e) Collection and payment services	(12,759)	(9,934)
including credit, debit and other payment cards	(12,364)	(8,856)
f) Securitisation transaction servicing	0	0
g) Commitments to receive funds	0	0
h) Financial guarantees received	(1,320)	(1,342)
of which: credit derivatives	0	0
i) Off-site distribution of financial instruments, products and services	0	0
j) Currency trading	0	0
k) Other fee and commission expense	(87,846)	(63,881)
Total	(106,090)	(78,885)

Fee and commission expense for guarantees received consist entirely of payments to the M.C.C. for the granting of guarantees for SMEs, pursuant to Italian Law 662/96, Article 2, paragraph 100, letter a).

SECTION 3 – DIVIDENDS AND SIMILAR INCOME – ITEM 70

3.1 DIVIDENDS AND SIMILAR INCOME: BREAKDOWN	Total 2024		Total 2023	
Items/Income	Dividends	Similar income	Dividends	Similar income
A. Financial assets held for trading	0	0	0	0
B. Other financial assets mandatorily measured at fair value	0	150	0	100
C. Financial assets measured at fair value through other comprehensive income	10,237	0	10,235	0
D. Equity investments	0	0	0	0
Total	10,237	150	10,235	100



PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

ANALYSIS OF ITEM 70 - DIVIDENDS AND SIMILAR INCOME	Total 2024	Total 2023
A. Financial assets held for trading		
B. Other financial assets mandatorily measured at fair value:	150	100
- Similar income	150	100
C. Financial assets measured at fair value through other comprehensive income	10,237	10,235
- Bank of Italy	10,200	10,200
- Similar income	37	35
D. Equity investments	0	0
Total	10,387	10,335

SECTION 4 - NET PROFIT (LOSS) FROM TRADING - ITEM 80

4.1 NET PROFIT (LOSS) FROM TRADING: BREAKDOWN	Capital gains (A)	Trading profits (B)	Capital losses (C)	Trading losses (D)	Net profit (loss) [(A+B) - (C+D)]
Transactions/Income					
1. Financial assets held for trading	66,497	83,540	(10,275)	(33,930)	105,832
1.1 Debt securities	0	6,165	0	(5)	6,160
1.2 Equity securities	0	0	0	0	0
1.3 Units of UCITS	0	0	0	0	0
1.4 Loans	66,497	77,375	(10,275)	(33,925)	99,672
1.5 Other	0	0	0	0	0
2. Financial liabilities held for trading	0	0	0	0	0
2.1 Debt securities	0	0	0	0	0
2.2 Deposits	0	0	0	0	0
2.3 Other	0	0	0	0	0
Financial assets and liabilities: foreign exchange differences	X	X	X	X	688
3. Derivatives	1,215	15,401	(2,081)	(30,056)	(15,598)
3.1 Financial derivatives:	1,215	15,401	(2,081)	(30,105)	(15,647)
- On debt securities and interest rates	1,215	15,398	(2,081)	(12,905)	1,627
- On equity securities and stock indices	0	3	0	(16,938)	(16,935)
- On currencies and gold	X	X	X	X	(77)
- Other	0	0	0	(262)	(262)
3.2 Credit derivatives	0	0	0	49	49
of which: natural hedges related to fair value option	X	X	X	X	0
Total	67,712	98,941	(12,356)	(63,986)	90,922



SECTION 5 - NET PROFIT (LOSS) FROM HEDGING - ITEM 90

5.1 NET PROFIT (LOSS) FROM HEDGING: BREAKDOWN Income/Amounts	Total 2024	Total 2023
A. Gains on:		
A.1 Fair value hedging derivatives	14,645	12,265
A.2 Hedged financial assets (fair value)	20,373	149,327
A.3 Hedged financial liabilities (fair value)	0	0
A.4 Cash-flow hedging derivatives	0	0
A.5 Assets and liabilities denominated in foreign currency	0	0
Total gains on hedging activities (A)	35,018	161,592
B. Losses on:		
B.1 Fair value hedging derivatives	(19,469)	(147,767)
B.2 Hedged financial assets (fair value)	(14,293)	(12,173)
B.3 Hedged financial liabilities (fair value)	0	0
B.4 Cash-flow hedging derivatives	0	0
B.5 Assets and liabilities denominated in foreign currency	0	0
Total losses on hedging activities (B)	(33,762)	(159,940)
C. Net profit from hedging activities (A - B)	1,256	1,652
of which: results of hedges on net positions	0	0

SECTION 6 – GAINS/(LOSSES) ON DISPOSAL/REPURCHASE - ITEM 100

6.1 GAINS (LOSSES) ON DISPOSAL/REPURCHASE: BREAKDOWN	Total 2024			Total 2023		
Items/Income	Gains	Losses	Net profit (loss)	Gains	Losses	Net profit (loss)
A. Financial assets						
1. Financial assets measured at amortised cost	6,685	(24,844)	(18,159)	1,864	(43,093)	(41,229)
1.1 Loans and advances to banks	0	(48)	(48)	0	0	0
1.2 Loans and advances to customers	6,685	(24,796)	(18,110)	1,864	(43,093)	(41,229)
2. Financial assets measured at fair value through other comprehensive income	14,742	0	14,742	58,583	(58,092)	491
2.1 Debt securities	14,742	0	14,742	55,106	(57,840)	(2,734)
2.2 Loans	0	0	0	3,477	(252)	3,225
Total assets (A)	21,427	(24,844)	(3,417)	60,447	(101,185)	(40,738)
B. Financial liabilities measured at amortised cost						
1. Deposits from banks	0	0	0	0	0	0
2. Deposits from customers	377	(2,073)	(1,696)	1,705	(1,041)	664
3. Debt securities in issue	547	0	547	574	(1)	573
Total liabilities (B)	924	(2,073)	(1,149)	2,279	(1,042)	1,237

The losses on "Loans and advances to customers" refer to losses originating from transfers of NPLs as part of the segment derisking strategy for € 23.1 million.

The gains on "Financial assets measured at fair value through other comprehensive income" includes income from the non-recourse transfer of loans.



PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

SECTION 7 – NET PROFIT (LOSS) FROM FINANCIAL ASSETS AND LIABILITIES MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS – ITEM 110

7.1 NET CHANGES IN FINANCIAL ASSETS AND LIABILITIES MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS: BREAKDOWN OF ASSETS AND LIABILITIES DESIGNATED AT FAIR VALUE	Capital gains (A)	Realised profits (B)	Capital losses (C)	Realised losses (D)	Net profit (loss) [(A+B) - (C+D)]
Transactions/Income					
1. Financial assets	0	0	0	0	0
1.1 Debt securities	0	0	0	0	0
1.2 Loans	0	0	0	0	0
2. Financial liabilities	104	5	0	0	109
2.1 Debt securities in issue	104	5	0	0	109
2.2 Deposits from banks	0	0	0	0	0
2.3 Deposits from customers	0	0	0	0	0
3. Financial assets and liabilities denominated in foreign currency: foreign exchange differences	X	X	X	X	0
Total	104	5	0	0	109

There were no write-downs or trading losses on assets linked to the credit impairment of the borrower/issuer.

7.2 NET CHANGES IN OTHER FINANCIAL ASSETS AND LIABILITIES MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS: BREAKDOWN OF OTHER FINANCIAL ASSETS MANDATORILY MEASURED AT FAIR VALUE	Capital gains (A)	Realised profits (B)	Capital losses (C)	Realised losses (D)	Net profit (loss) [(A+B) - (C+D)]
Transactions/Income					
1. Financial assets	1,526	0	(1,490)	(8)	28
1.1 Debt securities	0	0	(216)	0	(216)
1.2 Equity securities	0	0	0	0	0
1.3 Units of UCITS	1,526	0	(1,274)	(8)	244
1.4 Loans	0	0	0	0	0
2. Financial assets denominated in foreign currency: foreign exchange differences	X	X	X	X	0
Total	1,526	0	(1,490)	(8)	28



**SECTION 8 – NET ADJUSTMENTS/RECOVERIES FOR CREDIT RISK –
ITEM 130**

8.1 NET ADJUSTMENTS FOR CREDIT RISK ON FINANCIAL ASSETS MEASURED AT AMORTISED COST: BREAKDOWN	Value adjustments (1)						Recoveries (2)				Total 2024	Total 2023
	Stage 1	Stage 2	Stage 3		Purchased or originated credit impaired		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired		
			Write- offs	Other	Write- offs	Other						
Transactions/Income												
A. Loans and advances to banks	(20)	0	0	0	0	0	1	0	0	0	(19)	0
- Loans	0	0	0	0	0	0	1	0	0	0	1	0
- Debt securities	(20)	0	0	0	0	0	0	0	0	0	(20)	0
B. Loans and advances to customers	(6,037)	(719)	(4,858)	(124,150)	0	(618)	1,827	6,713	30,361	562	(96,919)	(66,278)
- Loans	(6,037)	(139)	(4,858)	(124,138)	0	(618)	1,666	6,713	30,340	562	(96,509)	(66,562)
- Debt securities	0	(580)	0	(12)	0	0	161	0	21	0	(410)	284
Total	(6,057)	(719)	(4,858)	(124,150)	0	(618)	1,828	6,713	30,361	562	(96,938)	(66,278)

The item recoveries on loans relating to loans and advances to customers includes € 19,294 thousand in recoveries from collection.

8.2 NET ADJUSTMENTS FOR CREDIT RISK ON FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME: BREAKDOWN Transactions/Income	Value adjustments (1)						Recoveries (2)				Total 2024	Total 2023
	Stage 1	Stage 2	Stage 3		Purchased or originated credit impaired		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired		
			Write- offs	Other	Write- offs	Other						
A. Debt securities	(15)	0	0	0	0	0	0	0	0	0	(15)	119
B. Loans	(399)	(1)	0	(206)	0	0	93	0	617	0	104	1,970
- to customers	(399)	(1)	0	(206)	0	0	93	0	617	0	104	1,970
- to banks	0	0	0	0	0	0	0	0	0	0	0	0
Total	(414)	(1)	0	(206)	0	0	93	0	617	0	89	2,089

The item recoveries on loans relating to loans and advances to customers includes € 322 thousand in recoveries from collection.

**SECTION 9 – PROFITS/LOSSES FROM CONTRACTUAL CHANGES
WITHOUT DERECOGNITION - ITEM 140**

The item includes the adjustment made to the carrying amounts of loans to customers which underwent modifications to the contractual cash flows without giving rise to derecognition, pursuant to paragraph 5.4.3 and Appendix A of IFRS 9.

As at 31 December 2024, this item represented a profit of approximately € 215 thousand.



PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

SECTION 10 – NET PREMIUMS – ITEM 160

There are no items of this type.

SECTION 11 – OTHER NET INSURANCE INCOME/EXPENSE – ITEM 170

There are no items of this type.

SECTION 12 - ADMINISTRATIVE EXPENSES - ITEM 190

12.1 PERSONNEL EXPENSES	Total 2024	Total 2023
Type of expense/Sectors		
1) Employees	(143,515)	(136,837)
a) wages and salaries	(101,909)	(96,045)
b) social security charges	(24,881)	(24,658)
c) termination indemnities	(6,754)	(6,155)
d) social security expenses	0	0
e) provision for employee severance pay	(66)	(245)
f) provision for pension fund and similar obligations:	0	0
- defined contribution	0	0
- defined benefit	0	0
g) contributions to external supplementary pension funds:	(4,158)	(3,948)
- defined contribution	(4,158)	(3,928)
- defined benefit	0	(20)
h) costs related to share-based payment arrangements	0	0
i) other employee benefits	(5,747)	(5,786)
2) Other staff	(3,602)	(3,576)
3) Directors and Statutory Auditors	(2,729)	(2,567)
4) Retired personnel	0	0
Total	(149,846)	(142,980)

12.2 AVERAGE NUMBER OF EMPLOYEES PER CATEGORY	Total 2024	Total 2023
1) Employees	1,767	1,813
a) executives	29	31
b) middle managers	606	573
c) remaining staff	1,132	1,209
2) Other staff	63	84
Total	1,830	1,897

12.3 DEFINED BENEFIT COMPANY PENSION FUNDS: COSTS AND REVENUES	
Costs and revenues	-494
Costs relating to employee severance pay	-494

	2024
	Employee severance pay
Costs and revenues recognised	-494
Social security cost relating to service	-5
Financial income from discounting shown in <i>Other Comprehensive Income</i>	-67
Financial expenses recognised in Profit or Loss	-422



12.5 OTHER ADMINISTRATIVE EXPENSES: BREAKDOWN	Total 2024	Total 2023
Expenses for data processing and archiving	(30,573)	(32,091)
Rent payable on real estate and rental of moveable assets	(1,710)	(1,619)
Expenses for the maintenance of real estate and moveable assets	(6,892)	(6,040)
Legal expenses	(5,432)	(5,520)
Building management expenses	(5,647)	(5,672)
Phone, data transmission and postal expenses	(3,453)	(3,832)
Advertising and promotional expenses	(4,097)	(4,404)
Expenses for commercial information, records, appraisals	(6,774)	(5,906)
Costs for the provision of services regarding personnel	(1,026)	(783)
Securitisation costs	(5,618)	(5,417)
Expenses for transportation of valuables	(3,334)	(2,943)
Other professional and advisory expenses	(8,228)	(8,587)
Expenses for office materials	(683)	(698)
Membership fees	(9,984)	(15,247)
Electronic banking	(756)	(580)
Travel and transportation expenses	(1,158)	(1,134)
Machine rental expenses	(1,205)	(1,282)
Expenses for the acquisition of treasury services	(3)	(8)
Customer insurance	0	
Other expenses	(5,687)	(4,644)
INDIRECT TAXES AND DUTIES		
Stamp duties	(28,064)	(25,750)
Substitute tax	(2,255)	(1,796)
IMU/ICI tax	(1,341)	(1,423)
Municipal solid waste disposal fee	(304)	(307)
Advertising tax	(221)	(210)
Registration tax	(87)	(124)
Other taxes and duties	(191)	(160)
Total	(134,723)	(136,177)

SECTION 13 – NET ALLOCATIONS TO PROVISIONS FOR RISKS AND CHARGES - ITEM 200

13.1 NET PROVISIONS FOR CREDIT RISK RELATING TO COMMITMENTS TO DISBURSE FUNDS AND GUARANTEES GIVEN: BREAKDOWN	Total 2024	Total 2023
Commitments to disburse funds and financial guarantees given stage 1-2	107	178
Commitments to disburse funds and financial guarantees given stage 3	(3,352)	94
Total	(3,245)	272

13.3 NET ALLOCATIONS TO OTHER PROVISIONS FOR RISKS AND CHARGES: BREAKDOWN	Total 2024	Total 2023
Provisions and reallocations to provisions for risks due to claw-backs	(273)	(391)
Provisions and reallocations to provisions for personnel expenses	(615)	(119)
Provisions and reallocations for other disputes	(1,301)	(582)
Other provisions and reallocations to provisions for risks and charges	(16,425)	(5,793)
Total	(18,614)	(6,885)



PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

SECTION 14 - NET ADJUSTMENTS TO/RECOVERIES ON PROPERTY, PLANT AND EQUIPMENT - ITEM 210

14.1 NET ADJUSTMENTS TO/RECOVERIES ON PROPERTY, PLANT AND EQUIPMENT: BREAKDOWN Asset/Income	Depreciation (a)	Impairment losses (b)	Recoveries (c)	Net profit (loss) (a + b - c)
A. Property, plant and equipment				
1. Used in the business	(15,498)	0	0	(15,498)
- Owned	(8,986)	0	0	(8,986)
- Rights of use acquired with leases	(6,512)	0	0	(6,512)
2. Held for investment purposes	(1,388)	0	0	(1,388)
- Owned	(1,388)	0	0	(1,388)
- Rights of use acquired with leases	0	0	0	0
3. Inventory	X	0	0	0
Total	(16,886)	0	0	(16,886)

SECTION 15 – NET ADJUSTMENTS TO/RECOVERIES ON INTANGIBLE ASSETS - ITEM 220

15.1 NET ADJUSTMENTS TO/RECOVERIES ON INTANGIBLE ASSETS: BREAKDOWN Asset/Income	Amortisation (a)	Impairment losses (b)	Recoveries (c)	Net profit (loss) (a + b - c)
A. Intangible assets				
Of which: software	(5,466)	-	-	(5,466)
A.1 Owned	(7,493)	0	0	(7,493)
- Generated internally by the company	0	0	0	0
- Other	(7,493)	0	0	(7,493)
A.2 Rights of use acquired with leases	0	0	0	0
Total	(7,493)	0	0	(7,493)

SECTION 16 - OTHER OPERATING EXPENSES/INCOME - ITEM 230

16.1 - 16.2 OTHER OPERATING EXPENSES/INCOME: BREAKDOWN	Total 2024	Total 2023
Other operating income	40,276	70,640
Tax recovery	29,830	27,161
Charges to third parties for costs on deposits and c/a	415	382
Rent and fee income	1,991	1,891
Other income	6,112	39,615
Recoveries of other expenses	1,928	1,591
Other operating expenses	(3,395)	(2,800)
Amortisation on leasehold improvements	(976)	(1,021)
Other expenses and contingent liabilities	(2,419)	(1,779)
Total other operating expenses/income	36,881	67,840

Other income includes the €5 million related to the earn-out of the transfer transaction of the acquiring business. The same item included for 2023 the capital gain from the merchant acquiring business of € 37 million.

SECTION 17 - GAINS (LOSSES) ON EQUITY INVESTMENTS - ITEM 250

There are no items of this type.



SECTION 18 - NET GAINS (LOSSES) ON PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS MEASURED AT FAIR VALUE - ITEM 260

There are no items of this type.

SECTION 19 – IMPAIRMENT OF GOODWILL - ITEM 270

There are no items of this type.

SECTION 20 – GAINS (LOSSES) ON DISPOSAL OF INVESTMENTS - ITEM 280

20.1 GAINS (LOSSES) ON DISPOSAL OF INVESTMENTS: BREAKDOWN Income/Sectors	Total 2024	Total 2023
A. Property	(267)	53
- Gains on disposal	(134)	53
- Losses on disposal	(133)	0
B. Other assets	(3)	4
- Gains on disposal	12	4
- Losses on disposal	(15)	0
Net profit (loss)	(270)	57

SECTION 21 – TAX EXPENSES (INCOME) FOR THE YEAR FROM CONTINUING OPERATIONS - ITEM 300

21.1 TAX EXPENSES (INCOME) FOR THE YEAR FROM CONTINUING OPERATIONS: BREAKDOWN Income/Sectors	Total 2024	Total 2023
1. Current tax (-)	(8,540)	(6,786)
2. Changes of current tax of previous years (+/-)	0	(194)
3. Decreases in current tax for the year (+)	5,494	4,580
3.bis Decreases in current tax for the year due to tax credit pursuant to Law 214/2011 (+)	0	0
4. Changes in deferred tax assets (+/-)	(19,689)	(8,050)
5. Changes in deferred tax liabilities (+/-)	(4,081)	(10,391)
6. Tax expense for the year (-) (-1+/-2+3+3bis+/-4+/-5)	(26,816)	(20,841)

21.2 RECONCILIATION BETWEEN THEORETICAL AND ACTUAL TAX CHARGE Items/Amounts	Total 2024
Profit before tax (item 250)	78,045
THEORETICAL TAXES	(25,830)
DEFINITIVE TAX INCREASES	(17,597)
- non-deductible costs and expenses	(1,506)
- non-deductible write-downs	(7,927)
- higher tax base and effective IRAP tax rate	(6,796)
- IMU tax and other non-deductible costs and taxes	(1,368)
DEFINITIVE TAX DECREASES	16,611
- exempt share of dividends and pex	0
- Aid to economic growth (ACE)	2,883
- lower tax base and effective IRAP tax rate	0
- change in taxes from previous years	13,728
- other decreases	0
INCOME TAXES IN INCOME STATEMENT	(26,816)



PART C
INFORMATION ON THE
CONSOLIDATED
INCOME STATEMENT

SECTION 22 – PROFIT (LOSS) AFTER TAX FROM DISCONTINUED OPERATIONS - ITEM 320

There are no items of this type.

SECTION 23 – MINORITY PROFIT (LOSS) FOR THE YEAR - ITEM 340

23.1 DETAILS OF ITEM 340 MINORITY PROFIT (LOSS) FOR THE YEAR Company Name	Total 2024	Total 2023
Equity investments with significant minority interests		
1. Pitagora Contro Cessione del Quinto S.p.A.	5,859	(836)
2. We Finance S.p.A.	418	(518)
Other equity investments	0	0
Total	(9,804)	(1,354)

SECTION 24 – OTHER INFORMATION

There are no items of this type.

SECTION 25 – EARNINGS PER SHARE

25.1 Average number of diluted ordinary shares

As there are no preference shares or financial instruments which could entail the issue of shares, there are no dilutive effects on the share capital.

25.2 Other information

The consolidated earnings per share, calculated by dividing the net profit by the 70,537,048 ordinary shares outstanding, are € 0.73.



**PART D
CONSOLIDATED
COMPREHENSIVE
INCOME**

DETAILED STATEMENT OF CONSOLIDATED COMPREHENSIVE INCOME		Total 2024	Total 2023
Items			
10.	Profit (loss) for the year	51,229	79,039
	Other income without reversal to income statement	48	(323)
20.	Equity securities designated at fair value through other comprehensive income:	105	24
	a) change in fair value	105	0
	b) transfers to other components of shareholders' equity	0	24
30.	Financial liabilities designated at fair value through profit or loss (own creditworthiness changes):	(78)	(92)
	a) change in fair value	(78)	(92)
	b) transfers to other components of shareholders' equity	0	0
40.	Hedging of equity securities designated at fair value through other comprehensive income:	0	0
	a) change in fair value (hedged instrument)	0	0
	b) change in fair value (hedging instrument)	0	0
50.	Property, plant and equipment	0	0
60.	Intangible assets	0	0
70.	Defined benefit plans	3	299
80.	Non-current assets held for sale and discontinued operations	0	0
90.	Share of valuation reserves of equity investments carried at equity	0	0
100.	Financial revenues or costs relating to insurance contracts issued	0	0
110.	Income tax relating to other income without reversal to income statement	18	(554)
	Other income with reversal to income statement	6,353	22,818
120.	Foreign investment hedges:	0	0
	a) changes in fair value	0	0
	b) reversal to income statement	0	0
	c) other changes	0	0
120.	Exchange differences:	0	0
	a) changes in value	0	0
	b) reversal to income statement	0	0
	c) other changes	0	0
140.	Cash flow hedging:	737	(739)
	a) changes in fair value	737	(739)
	b) reversal to income statement	0	0
	c) other changes	0	0
	of which: result of net positions	0	0
150.	Hedging instruments (elements not designated):	0	0
	a) changes in value	0	0
	b) reversal to income statement	0	0
	c) other changes	0	0
160.	Financial assets (other than equity securities) measured at fair value through other comprehensive income:	8,755	34,831
	a) changes in fair value	8,740	34,950



PART D
CONSOLIDATED
COMPREHENSIVE
INCOME

	b) reversal to income statement	15	(119)
	- losses for credit risk	15	(119)
	- realised gains/losses	0	0
	c) other changes	0	0
170.	Non-current assets held for sale and discontinued operations:	0	0
	a) changes in fair value	0	0
	b) reversal to income statement	0	0
	c) other changes	0	0
180.	Share of valuation reserves of equity investments carried at equity:	0	0
	a) changes in fair value	0	0
	b) reversal to income statement	0	0
	- impairment losses	0	0
	- realised gains/losses	0	0
	c) other changes	0	0
190.	Financial revenues or costs relating to insurance contracts issued	0	0
	a) changes in fair value	0	0
	b) reversal to income statement	0	0
	c) other changes	0	0
200.	Financial revenues or costs relating to outwards reinsurance	0	0
	a) changes in fair value	0	0
	b) reversal to income statement	0	0
	c) other changes	0	0
210.	Income tax relating to other income with reversal to income statement	(3,139)	(11,274)
220.	Total other income	6,401	22,495
230.	Other comprehensive income (Item 10+220)	57,630	101,534
240.	Minority consolidated other comprehensive income	3,365	(1,598)
250.	Parent Company's consolidated other comprehensive income	54,265	103,132



A. CREDIT QUALITY

SECTION 1 - RISKS OF THE ACCOUNTING CONSOLIDATED PERIMETER

QUANTITATIVE INFORMATION

A. CREDIT QUALITY

A.1 NON-PERFORMING AND PERFORMING CREDIT EXPOSURES: AMOUNTS, WRITE-DOWNS, CHANGES, DISTRIBUTION BY BUSINESS ACTIVITY

A.1.1 BREAKDOWN OF FINANCIAL ASSETS BY PORTFOLIO AND CREDIT QUALITY (BOOK VALUES)	Bad loans	Unlikely to pay	Non-performing past due exposures	Other non-performing exposures	Performing exposures	Total
Portfolios/quality						
1. Financial assets measured at amortised cost	31,278	149,780	29,196	58,396	9,278,495	9,547,145
2. Financial assets measured at fair value through other comprehensive income	1,521	968	622	7	933,605	936,723
3. Financial assets designated at fair value	0	0	0	0	0	0
4. Other financial assets mandatorily measured at fair value	0	0	0	0	5,874	5,874
5. Financial assets held for sale	0	0	0	0	0	0
Total 2024	32,799	150,748	29,818	58,403	10,217,974	10,489,742
Total 2023	41,533	97,873	34,345	84,730	10,164,253	10,422,734

A.1.2 BREAKDOWN OF FINANCIAL ASSETS BY PORTFOLIO AND CREDIT QUALITY (GROSS AND NET VALUES)	Non-performing				Performing			Total (net exposure)
Portfolios/Quality	Gross exposure	Overall value adjustments	Net exposure	Total partial write-offs*	Gross exposure	Overall value adjustments	Net exposure	
1. Financial assets measured at amortised cost	389,238	178,984	210,254	24,663	9,386,054	49,163	9,336,891	9,547,145
2. Financial assets measured at fair value through other comprehensive income	4,226	1,115	3,111	0	933,918	306	933,612	936,723
3. Financial assets designated at fair value	0	0	0	0	X	X	0	0
4. Other financial assets mandatorily measured at fair value	0	0	0	0	X	X	5,874	5,874.00
5. Financial assets held for sale	0	0	0	0	0	0	0	0
Total 2024	393,464	180,099	213,365	24,663	10,319,972	49,469	10,276,377	10,489,742
Total 2023	331,640	157,889	173,751	31,965	10,299,744	56,139	10,248,983	10,422,734

Portfolios/Quality	Assets with evident poor credit quality		Other assets
	Accumulated capital losses	Net exposure	Net exposure
1. Financial assets held for trading	(373)	1,661	86,683
2. Hedging derivatives	0	0	2
Total 2024	(373)	1,661	86,685
Total 2023	(242)	1,214	55,580



SECTION 2 - RISKS OF THE PRUDENTIAL CONSOLIDATED PERIMETER

RISK MANAGEMENT POLICIES

In observance of the Prudential Supervision Regulations and the strategies established in the various planning documents, the Cassa di Risparmio di Asti Group considers the process of continuously refining and reinforcing the overall Internal Control System and the verification of current and outlook capital adequacy to be strategic in nature.

The Group is consequently continuing seamlessly with activities geared towards the evolution of its Internal Control System with a view to obtaining positive results in terms of greater effectiveness and integration of the oversight mechanisms in response to the risks identified, by also adjusting, where necessary, its reference internal regulations.

As part of continuous monitoring activities, the Bank conducted a careful assessment of all risks to which it could be exposed, identifying as relevant credit, counterparty, market (first and second pillar on the portfolio of FVOCI securities of the banking book), operational and IT, concentration, interest rate and liquidity risk, as well as risks deriving from securitisation transactions, compliance and anti-money laundering risk and strategic, country, reputational, residual, model and excessive financial leverage risks.

Following this activity, according to the internal capital adequacy assessment process, in April 2024 the Bank prepared the ICAAP Report referring to 31 December 2023 for the overall scope of the relevant Group, then sent it to the Supervisory Body.

In the ICAAP for the financial year, the Group's current and prospective capital adequacy degree (for the 2024-2025 two-year period, in the baseline and stressed scenario), taking into account the forecast plans in the reference time horizon included in the key planning documents (in particular the 2022-2024 Strategic Plan, 2024 Annual Budget, NPE Strategy).

The evidence that emerges from the execution of the 2024 ICAAP process, both with regard to the current or "starting" situation (referring to 31 December 2023), and from a forward-looking perspective (the latter in both ordinary and stressed scenarios), shows a more than satisfactory degree of Group capitalisation, whose capital assets are suitable to ensure compliance with the supervisory requirements, both in the current, uncertain economic situation characterised by wars that are having a significant impact on the reference economic context of European banks, and in the assumption of a particularly severe adverse scenario.

The above-mentioned internal process requires an initial risk mapping, with the schematic identification of sources of origin, to be followed, for each type of risk, by a detailed analysis of the following aspects, when applicable:

- the sources of risk to be assessed;
- the structures responsible for management;
- the measurement/valuation and management instruments and methodologies;
- risk measurement and the determination of the relative internal capital.



1.1 CREDIT RISK

In compliance with the provisions laid out by the Bank of Italy with Circular 285 of 17 December 2013, please note that the information pursuant to the “Basel 3 Pillar 3 - PUBLIC DISCLOSURE” relating to capital adequacy, risk exposure and the general characteristics of the systems responsible for the identification, measurement and management of those risks, was published on the website “*www.bancadiasti.it*” of Cassa di Risparmio di Asti S.p.A.

The subsequent sections explain in detail the different nature of the risks and the company structures responsible for managing them.

SECTION 1 - CREDIT RISK**QUALITATIVE INFORMATION****1. General aspects**

The credit policy of the Cassa di Risparmio di Asti Group, as defined by the "Group Credit Policies", is geared towards the needs of customers belonging to the private and corporate segments with strong links to the area of competence, in other words, the retail market composed of subjects with whom it is possible to "personalise" the relationship.

The company's lending strategy therefore remains focussed on working with counterparties whose strategic decisions and decisive economic and financial factors it can be familiar with, prioritising credit risk protection over increasing asset volumes.

With this in mind, the entry of Biverbanca into the Group at the end of 2012, then incorporated into the Parent Company in 2021, made it possible to further improve the overall lending activity, with the possibility of achieving a higher return on loans, greater diversification and granularity of the loan portfolio and the introduction of processes and products of the Parent Company dedicated to the segment of private customers who were not present in the subsidiary. The acquisition of control of Pitagora S.p.A., on the other hand, made it possible to expand the market and the area of operations with the aim of increasing and diversifying the sources of income and development through a company specialising in salary/pension-backed loans (CQS/CQP) which has a multi-functional network throughout the country, in particular in northern and central Italy, and which for many years has employed an innovative business model aimed at banks and the retail market.

For further details, please refer to the public disclosure of the Cassa di Risparmio di Asti Group ("Third Pillar").

2. Credit risk management policies**2.1. Organisational aspects**

The Board of Directors of the Parent Company, with the support of the Risks and Sustainability Committee (internal board), defines the general lines of the process and the credit management policies, which are implemented by the Boards of



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

Directors of the subsidiaries and implemented by the Chief Executive Officer/General Manager of the Parent Company and of the individual companies.

Within the Banca di Asti, credit risk management is assigned, to a different extent depending on the mission and activities assigned by the “Internal Regulation”, to the following Organisational Units:

- Risks and ALM Committee (managerial): supports the Chief Executive Officer/General Manager of the Parent Company in the analysis of the loan portfolios of the individual companies and of the Group as a whole, in monitoring the current and future risk level and in identifying the actions taken to optimise, as part of the overall management of the ALM, the composition of the loan portfolio and the related risk/return ratio;
- Group Credit Policies Committee: supports the Parent Company’s Chief Executive Officer/General Manager, in line with the strategic decisions approved, in defining and coordinating the credit policy guidelines of the individual Companies and the Group as a whole, as well as with optimising the risk/return profile of the loan portfolio;
- Credit Committee: directs and optimises, at the operational level, the credit activity of the relative Company, within the framework of the strategies and policies approved by the competent Corporate Bodies. The Credit Committee defines the general and specific guidelines for the operational management of credit risk and resolves on the transactions for which it is responsible provided for in the relative “Regulation of delegated powers in the field of credit transactions”; moreover, it expresses opinions on the practices pertaining to the Board of Directors and the Chief Executive Officer, or, with reference to the Parent Company, also on the practices of the subsidiaries within the decision-making competence of the relevant Board of Directors;
- Credit Department: directs the operational activities of its Bank in accordance with the strategies, policies and provisions defined by the competent Corporate Bodies and supervises and coordinates the overall credit risk underwriting and management activity. Operationally, the Credit Manager relies on the Credit Lines Department, the Private Parties Lending Department, the Special Loans Department, Loans under Observation Department and the Loan Operational Management Department, each within the scope of its own responsibilities;
- Non-Performing Loans Department: optimises the management of non-performing loans (NPE) in line with the objectives of NPE Ratio reduction, debt collection and active management of the NPE portfolio and supervises the non-performing loan classification and measurement processes. The operating units within this Department are represented by the Credit Portfolio Monitoring & Collection Management Office, the Anomalous Loans Management Office and the Bad Loans Management Office;
- Commercial Network: pursues commercial and income objectives of maximising profitability corrected for the risks assumed, continuously seeks the improvement of commercial and operational effectiveness, oversees the systematic acquisition of information (both quantitative and qualitative) on


1.1 CREDIT RISK

managed customers in order to favour adequate assessments of creditworthiness or to verify subsequent deterioration, promptly reporting them to the Credit Lines Department and the Loans under Observation Department;

- Compliance Function: prevents the risk of non-compliance with external and internal regulations;
- Finance Function: as part of the strategies defined by the Board of Directors in the “Group financial investment policies” and in observance of the limits established in the “Regulation of delegated powers on financial transactions”, as well as the operational guidelines of the General Manager, the effective management of the owned securities portfolio of the Group in terms of composition and the risk/return ratio;
- Risk Management Function: constantly monitors the trend of the risk level of the loan portfolio, informing the competent Bodies and Functions through the preparation of adequate reports, draws up the data needed for the preparation of the proposal to develop and update the risk objectives, the tolerance thresholds and the maximum assumable risk (in coordination with the Planning Function), promptly informs the competent Bodies and/or Functions of situations in which alert levels have been exceeded, the levels of risk appetite and/or the correlated tolerance thresholds established as part of the Risk Appetite Framework, it takes care of the effectiveness of the methodologies adopted for the assessment, measurement, control and management of the loan portfolio, reporting and suggesting any improvement actions, performs both large-scale and sample checks on the positions which make up the loan portfolio of the Group, in compliance with the provisions specifically governed by the “Group Regulation on the Verification of Credit Performance Monitoring”, issues preventive opinions on the consistency of the Major Transactions with the Risk Governance Policies and with the RAF and implements periodic controls aimed at ensuring compliance with the model outlined for the management of OMRs (transactions of greater importance).

Furthermore, as part of the Risk Control Function, the Credit Risk Models and Rating Desk Department oversees the Rating Attribution process within the new AIRB rating system and is competent to resolve on requests for Override and Certification of the counterparty rating.

The process of disbursing and managing loans is governed, first of all, by the “Regulation of delegated powers”, further outlined in the “Regulation of delegated powers on credit transactions”. In particular, the latter defines the breakdown and extent of delegations on lending between the delegated parties of the head office and the delegated parties of the Sales Network: credit facilities are classified in 6 risk categories on the basis of the type of transaction, subsequently aggregated into 4 risk classes. There are also quantitative rating limits (at the level of the amount of appropriately aggregated transactions) pre-established by the Regulation itself which identifies, for the delegated parties of the Branch Network, a further breakdown into



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

4 categories with different levels of delegated powers. The category is attributed by the General Manager or by the Credit Director on the basis of the capabilities of the person holding that role.

Within the more specific concentration risk, the Group pays significant attention to the overall exposure to different customer segments and the process of defining groups of connected customers and lending to and managing such groups.

To oversee the group lending and management process, the "Regulation of delegated powers on credit transactions" introduces, for that situation, greater rigour in the decision-making and operational capabilities of the delegated parties through specific articles.

As regards the creditworthiness of the issuers of securities held in the Group portfolio, the minimum rating requirements are set forth in the "Regulation of delegated powers on financial transactions" and constantly monitored by the Parent Company's Integrated Risk Control Office.

2.2. Credit risk management, measurement and control

The credit facility screening procedure, as far as the Parent Company is concerned, is divided into three macro-classes of activities:

- acquiring documentation;
- acquiring information and data;
- processing and putting together available information with different levels of detail depending on the type of transaction concerned.

Furthermore, for the counterparties belonging to the "Private", "Retail Businesses AIRB" and "Corporate AIRB" segments, the holder of the relationship within the Commercial Network must start the process that leads to the assignment of a counterparty rating (activity regulated by "Regulatory and Operational Provisions on Rating Attribution").

For credit facilities to businesses, the information from the Sales Network is supplemented by the data taken from Innolva reports (chamber of commerce records, corporate structure analyses, personal information sheets on directors and shareholders), websites and print media (IlSole24Ore and industry journals).

The quantitative analysis aims to provide a snapshot of the customer from the economic, financial and capital perspective, and relies on a broad range of tools, including:

- IT tools for the reclassification of financial statement data and income documentation;
- Statistical databases and position sheets for the analysis of relationships with the Bank;
- Central Credit Register of the Bank of Italy for the analysis of trends of relationships with other institutions;
- information provided by the customer and real estate mortgage records to compile records on owned real estate;



1.1 CREDIT RISK

- Interbank register of bad cheques and payment cards database, protests database, databases of chamber of commerce and land registry adverse entries to verify the presence or otherwise of adverse events;
- EURISC CRIF database.

Basic tools used to support credit rating analysis are the internal A-IRB rating system (for the Private, Retail Businesses and Corporate segments) and, to a residual extent, the internal C.R.S. (Credit Rating System) scoring system. Both models, developed by Cedacri, define an internal scoring system used to assign a likelihood of insolvency to each customer, to allow the Group Banks to group their loan portfolios into uniform risk classes.

In collaboration with the outsourcer Cedacri and with other participating banks, the Group has for years undertaken a project for the development of an A-IRB (Advanced Internal Rating Based) Pooled Rating system with a view to refining the system for measuring credit risk and making company credit measurement and governance processes more robust.

The aforementioned project, which first saw the adoption of the A-IRB rating on the Corporate, Retail Business and Private segments for management purposes, in 2023 obtained validation for prudential purposes (subject to adoption of prior remedial actions in the area of governance and validation). The A-IRB rating, when applicable, involves a Rating Attribution process which aims to integrate qualitative information which, by its nature, cannot be autonomously drawn from the model.

All of this constitutes the prerequisite for a better analysis of loan portfolio trends (evolution of risk and resulting determination of adjustments on performing loans) and the use of the rating system as an operating tool in terms of delegations and pricing.

The screening phase envisaged for performing loans to private parties, supported by a repayment plan and not intended directly or indirectly for business activities (mortgage loans, takeovers of builders' loans and discharging takeovers of loans to private parties, consumer credit, unsecured loans to private consumers) and for credit cards, relies on the support of credit scoring techniques, through the Crif analysis, as well as the investigation tools commonly employed for other credit facilities (Central Credit Register of the Bank of Italy, Protests and Adverse Events Control - database provided by Innolva - verification of business performance and anomalies reported in the EURISC CRIF database). Limited to loans in the form of consumer credit, the analysis is further supplemented by the scoring of the Experian and CTC SICs (Credit Information Systems).

Aside from the granting phase, an additional fundamental moment in the process of managing credit risk is represented, at least for the types concerned, by the renewal of credit facilities, governed by the Regulation on the matter.

Credit facilities subject to revocation must ordinarily be renewed at least every 12 months and each delegated party is responsible for deciding on the basis of the powers established for granting ordinary credit lines.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

In derogation of ordinary methods, for credit facilities subject to revocation which meet certain conditions, “automatic renewal” is envisaged, based on the customer rating, with subsequent confirmation by the party to which the commercial relationship is assigned.

In addition, the Credit Director is assigned the power to order the extraordinary review of credit facilities granted to customers, irrespective of renewal frequency. In this case, the decision on the review is under the responsibility of the Delegated bodies and the Head Office Delegated parties.

To measure credit risk, the Group relies on the SDB Matrix procedure made available by the IT outsourcer Cedacri S.p.A. for reporting purposes.

With respect to Pillar I, the Group adopts the standard method and, as concerns Credit Risk Mitigation techniques, the simplified method.

Within the ICAAP process, the Group periodically performs stress tests on the credit risk measurement. This activity, carried out centrally by the Parent Company, is aimed at determining the internal capital required to cope with possible losses resulting from the occurrence of stress scenarios characterised, inter alia, by assumptions involving an increase in the default rate compared to what was anticipated in the planning documents, a reduction in the value of guarantees, partially less effective public (MCC) and insurance guarantees (in particular for credits deriving from salary/pension-backed loans).

Furthermore, also within the scope of the Pillar II supervisory review process, the Group quantifies the internal capital required to cover concentration risk for each borrower and geo-sectorial, on the basis of the current situation as well as following the application of stress scenarios.

Lastly, an effective credit risk management process cannot but include continuous and careful control activities, at overall portfolio as well as individual customer level.

To guarantee respect for the delegation limits described above, the Group has put operating blocks into place which, through the “Autonomies Controls” procedure, prevent the entry of credit facilities if the delegation set forth in the specific internal regulation is surpassed.

The credit quality performance is overseen on a constant first level monitoring (line and second level controls). As set forth in the “Internal Regulation”, a first level control is enacted by the Local Network parties, handling the systematic acquisition of information - both quantitative and qualitative - on the customers managed, in order to favour adequate credit rating assessments and constant monitoring of rating changes, and promptly reporting to the Credit Lines Office and the Loans under Observation Office of the Parent Company any information potentially symptomatic of a deterioration in the creditworthiness.

This action is reinforced by periodic systematic controls (daily, weekly and monthly) performed at centralised level through the Loans under Observation Office and with the use of the CQM (Credit Quality Management) procedure. This IT tool is used to log information relating to the customer and the assessments performed by the managers responsible for analysing positions potentially at risk or already classified as unlikely to pay.



1.1 CREDIT RISK

The application also provides adequate functions for checking the work performed by employees, making the process directly monitorable by the responsible functions.

Within the Non-Performing Loans Division, the Loans Portfolio Monitoring and Collection Management Office is responsible for "first-level monitoring of second level controls", which consists in more extensive monitoring than for the normal "line controls" and, based on reports and periodic audits, focuses on the identification of loan portfolio trends, with the aim of contributing to the prompt application of the Bank's credit policies, verifying the effects of management decisions, monitoring the Bank's capacity to manage and limit the risk, as well as ensuring full compliance with credit risk monitoring regulations and associated management activities.

The Risk Control Function, on the basis of a dedicated regulation adopted following the issue of update XV of Bank of Italy Circular 263 of 27 December 2006 (now Bank of Italy Circular 285), is responsible for second level monitoring, i.e. verifying the proper execution of performance monitoring on individual exposures, particularly those which are non-performing, and assessing the consistency of classifications, the consistency of provisions and the adequacy of debt collection processes.

Additional loan portfolio monitoring is carried out through quarterly reporting generated by the Integrated Risk Control Office. In particular, analyses are carried out regarding the distribution and performance of credit risk according to various aggregation methods for the variables analysed, such as customer segmentation, the rating bracket and branches of business activities; concentration by customer/groups of customers and by business sector; the performance of risk parameters (EAD, PD and LGD) and other portfolio risk indicators; the composition and performance of risk-weighted assets.

2.3. Measurement methods for expected losses

Based on the provisions of IFRS 9 on impairment, financial assets are divided into three stages as summarised below:

- stage 1: assets which are performing in line with expectations, for which the value adjustments correspond to the expected losses related to the occurrence of default in the 12 months following the reporting date;
- stage 2: exposures whose creditworthiness is concerned by a significant deterioration, but for which the losses cannot yet be observed. The adjustments are calculated by considering the expected loss over the entire *lifetime* of the exposure, i.e. the estimate of the present value of losses (weighted for the respective probabilities of occurrence) that are verified in the period between the valuation date and the date of expiry of the instrument. Therefore, the case in which financial assets are past due by more than 30 days represents a significant increase in credit risk;
- stage 3: non-performing financial assets.

IFRS 9 makes it possible to evaluate each individual credit exposure by making recourse to multiple scenarios and associating a likelihood of occurrence with each of them.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

The Bank uses a set of geo-sectoral satellite models developed internally to estimate the forward-looking risk metrics used in the calculation of the write-downs of the credit portfolio.

Stage 1 and stage 2

With reference to performing loans, the Bank performs an overall assessment on the basis of information and historical series of known data. These loans were included in groups of financial assets with analogous characteristics in terms of credit risk, customer segments and sectors of economic activity, and were valued on a collective basis.

The risk parameters used in the calculation of collective write-downs (Probability of Default - PD, Loss Given Default - LGD and Credit Conversion Factor - CCF) are determined starting from the internal models estimated as part of the Pooled A-IRB project. These models were developed by using the pool data of the "Sponsor Banks" that participated in the project in order to strengthen the risk differentiation process (determination of risk drivers). The risk calibration process was instead carried out on the portfolio of the Cassa di Risparmio di Asti Group in order to reflect its specific features.

With regard to the internal parameters of LGD and CCF, estimated consistently with the regulatory requirements of prudential supervision, specific corrections have been adopted in order to make them suitable for calculating the expected accounting loss on receivables.

With regard to the conditioning of risk parameters to the evolution of macroeconomic forecast scenarios, from a forward-looking and multi-scenario perspective in accordance with the accounting standard, the Group adopts, as mentioned earlier, proprietary satellite models estimated with the support of the consulting firm Prometeia using a methodology in line with market best practices.

Stage 3

The competent offices responsible for non-performing loans then analysed each individual item and assigned to each, considering existing guarantees, both personal and collateral, and their presumed evolution, a value adjustment equal to the presumed potential loss in the case of the "internal management" scenario. The values intrinsic to the transfer scenarios were provided by the Risk Management Function, which made use of an external valuation company.

For all non-performing past due loans, unlikely to pay loans and bad loans of lower amounts, for the "internal management" scenario, the potential loss is attributed on a lump-sum basis in light of an analytical-statistical calculation methodology based on which the valuation of presumed losses, and the corresponding recovery values, is performed through the individual attribution of the estimated loss, broken down by counterparty (retail and business) and distinguishing between exposures backed by guarantees and other exposures. For more details, please refer to Part A Accounting policies in the "Method of determining impairment losses" section.



1.1 CREDIT RISK

2.4. Credit risk mitigation techniques

To mitigate credit risk, during the credit facility granting process, a particular focus is devoted to any guarantees to be requested, the effectiveness of which is checked periodically.

The general principle, correlated with credit risk management, establishes that the analysis of the economic and financial capacity of the loan applicant, as well as the analysis of the financial structure of the transaction, must be accompanied by the valuation of any guarantees (personal and collateral) backing the loan.

In order to evaluate the “weight” of the mortgage security with respect to the guaranteed loan, the following are considered:

- the market value resulting from the appraisal to calculate the maximum LTV (mortgage amount/value of real estate offered as guarantee) differentiated depending on whether the mortgage is on residential real estate or on commercial real estate;
- the present value and the type of titles pledged, to determine the percentage of actual coverage of the credit facility.

Real estate collateral allows for a mitigation of the capital absorption of credit risk when the conditions established by Supervisory Provisions are met.

In deciding on the application, the correlation between the borrower’s repayment capacity and the cash flows generated by the real estate as collateral is verified on the basis of shared criteria contained in the “Group policies on credit risk mitigation techniques”.

Alongside this oversight mechanism, internal regulations establish the guidelines and actions to ensure adequate surveillance and the periodic review of the property subject to the guarantee. These activities are also performed through the “Collateral” procedure provided by the IT outsourcer Cedacri in order to help manage the real estate acquired as collateral.

In evaluating the guarantee each structure, within its own delegation scope, takes into account the market value of the title pledged and analyses its type, which is a decisive factor for evaluating its risk.

In the analysis of personal guarantees, the financial capacity of the guarantor is evaluated on a priority basis, relying on a series of investigation tools such as: real estate records, mortgage and property registry records, adverse event databases, analysis of indebtedness to the system through the Central Credit Register, internal databases for evaluating portfolios of financial investments.

During the periodic credit facility review, the financial situation of the guarantors is updated by verifying the changes taking place in the real estate and financial assets (relying on the investigation tools outlined above) and the debt position (with the consultation of internal databases and the Central Credit Register).

As regards the amount of the guarantee with respect to the guaranteed position, the “Regulation of delegated powers on credit transactions” establishes that guarantees (omnibus and/or specific) acquired to back credit facilities must be provided on an ordinary basis for an amount of no less than 130% of the guaranteed facilities, to cover any expenses correlated with the principal obligation.



3. Non-performing credit exposures

3.1 Management strategies and policies

The “Group Policies on the classification and valuation of loans to ordinary customers” are intended, in compliance with what is set forth in legal and supervisory regulations, to:

- define the criteria and guidelines for the proper classification of loans;
- define the criteria, standards and techniques for determining provisions on loans to customers;
- define specific control activities relating to loan classification and valuation.

The International Accounting Standards lay out a series of risk elements the occurrence of which entails the classification of the loan as non-performing, such as significant financial difficulties of the borrower or the violation of contractual agreements, such as a breach or non-payment of interest or principal.

The Supervisory Instructions identify the elements characterising each classification category, and in particular:

- the category of bad loans includes all balance sheet exposures to parties in a state of insolvency, even if not declared by a court, or in substantially equivalent situations, irrespective of any loss forecasts formulated by the company. Therefore, this is irrespective of the existence of any guarantees (collateral or personal) backing the loans;
- the category of unlikely to pay includes all balance sheet and off-balance sheet exposures to borrowers for which the full satisfaction of credit obligations, including principal and interest, is deemed unlikely without recourse to specific actions such as in particular the enforcement of guarantees.

The inclusion of a position in “unlikely to pay loans” is carried out on the basis of a judgement concerning the unlikelihood of a borrower to meet its credit obligations in full. The classification of loans in the category of “unlikely to pay” is therefore the result of a specific assessment, accompanied by suitable internal documentation, intended to confirm the fulfilment of the relative requirements. This assessment is performed irrespective of the presence of any explicit symptoms of difficulty, such as failure to repay the loan or the failure to pay instalments, if there are other elements implying a situation of high likelihood of the borrower’s risk of breach.

In order to identify situations of “unlikely to pay”, the following are objective elements of the unlikelihood of the borrower to be capable of fully meeting its obligations, especially if they take place simultaneously:

- the submission of the application for an “arrangement as a going concern” provided for in the Code for Business Crisis and Insolvency, from the date of submission;
- the submission of the application for a “voluntary early arrangement with creditors with reserve” (“blank arrangement”) pursuant to the Code for Business Crisis and Insolvency, from the date of submission;



1.1 CREDIT RISK

- the finalisation of agreements with creditors pursuant to the Code for Business Crisis and Insolvency;
- the classification in "unlikely to pay loans" in another Group bank;
- access by the borrower to crisis resolution procedures (debt restructuring or consumer plan or other similar procedures reserved for insolvent persons) or liquidation of assets, upon formal notification to the Bank;
- the position is classified by the Group among performing loans or among past-due/overdue loans and relates to a natural person borrower who is a partner with unlimited liability in a credit facility screened partnership classified by the Group among unlikely to pay or bad loans;
- a Forborne forbearance measure is granted on the debt position of a borrower classified among "impaired past-due and/or overdue exposures";
- the granting to a borrower classified among performing exposures, facing or about to face difficulties in meeting its financial commitments, of an onerous restructuring involving a reduced financial obligation, calculated according to specific criteria, of more than 1%;
- the category of non-performing past-due and/or overdue loans includes exposures to customers other than those classified as bad loans or as unlikely to pay which have been past due or overdue for more than 90 consecutive days and have the characteristics specified below.

The inclusion of a position in the category of "non-performing past due and/or overdue exposures" occurs if the two materiality thresholds (absolute and relative) listed below are exceeded for 90 consecutive days at the Banking Group level:

- absolute threshold:
 - overdraft > € 100 for retail exposures, as defined pursuant to Article 123 of EU Regulation 575 of 26 June 2013 and subsequent updates;
 - overdraft > € 500 for the remaining exposures;
- relative threshold;
- 1% of the ratio between the total past due and the total exposure of the debtor or of the joint credit obligation of two or more debtors, without offsetting between the credit lines granted and possibly available, calculated at the Banking Group level.

Bad loans are managed by the Bad Loans Management Office, which assesses the actions to be taken to collect the debt. With respect to the names of borrowers with bad loans or which had bad loans in the past (even if paid off), the exercise of the decision-making powers granted to the delegated parties of the Sales Networks is suspended.

The return to performing status of non-performing exposures takes place with the borrower's recovery of conditions of full solvency, in particular:



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

- following the elimination of the entire exposure or the repayment of the past-due debt;
- with the restoration, also on the basis of updated credit ratings, of the conditions necessary to re-activate the relationship;
- thanks to the regularisation of the risk position.

Loans are evaluated by the competent organisational structures on the basis of internal regulations and with the application of the valuation criteria and standards set forth in the “Group Policies on the classification and valuation of loans to ordinary customers”.

The proposals for provisions for losses are submitted by the Managers of the competent Organisational Units, authorised by the General Manager of the competent Bank and subject to the assessment of the relative Board of Directors on a quarterly basis for confirmation or possibly modification.

3.2 Write-offs

The extinction of a bad loan may take place through the full collection of the debt or when one of the following takes place:

- partial collection of the debt, with the write-off of the remainder, as part of a settlement agreement with the principal borrower or with other obligors;
- a write-off of the residual loan once the possible judicial or out-of-court recovery actions deemed appropriate have been carried out, based on an assessment of convenience, with respect to all obligors;
- closure of bankruptcy proceedings in the absence of other possibilities for recovery through actions against any co-obligors;
- total write-off of loans of small amounts for which starting or continuing legal actions is not considered cost effective;
- partial or full write-off of the loan, by reduction or zeroing of its gross value, even without the Bank waiving its legal right to recover the loan, where there is no reasonable expectation of full or partial recovery.

Thus also the removal of the classification of “unlikely to pay loan” may take place, inter alia, when the debt is partially collected, with the write-off of the remainder, as part of a settlement agreement with the principal borrower or with other obligors.

3.3 Purchased or originated impaired financial assets

According to IFRS 9, in certain cases, a financial asset is deemed impaired on initial recognition since it has very high credit risk and, if purchased, it is acquired with significant discounts (with respect to the initial disbursement value). If the financial assets in question, on the basis of the application of classification drivers, are classified under assets measured at amortised cost or at fair value through other comprehensive income, they are qualified as “Purchased or Originated Credit Impaired Assets” (POCI) and subject to specific treatment. In particular, as of the date of initial recognition and for their entire lifetime, they are accounted for with value adjustments equal to their lifetime Expected Credit Loss (ECL). POCI financial assets are initially recognised in stage 3, without prejudice to the possibility of being



1.1 CREDIT RISK

subsequently transferred to performing loans, stage 2, with the recognition of the expected loss again equal to the lifetime ECL. This qualification is also applied for reporting purposes.

4. Financial assets subject to commercial renegotiations and forbore exposures

The nature of commercial renegotiations consists in the purpose of consolidating relations with the borrower which, as a result of hardship conditions being verified as defined in the policy, in any event proves to be able to promptly satisfy the financial obligations originally assumed. A forbearance measure, on the other hand, is defined as measure granted to a borrower who is experiencing or about to experience difficulties in meeting its obligations (known as financial distress).

In order for a position to be identified as forbore, it must therefore be verified that the exposure is the subject of a measure granted in response to a financial difficulty of the borrower. A forbore position thus involves meeting both objective conditions, identifiable in the contracts that have been the subject of a measure, and subjective conditions, related to the identification of a borrower's financial distress situation. Forbearance measures are granted in order to help the borrower to honour its obligations to the Group on time, preventing, if the conditions are met, performing loans from being impaired, or to 'remedy' its impaired positions, with the expectation of being able to return them to performing status.

In detail, forbearance means:

- a change in the contractual terms and conditions (renegotiation) granted to a borrower who demonstrates insufficient capacity to service the debt due to financial difficulties;
- a total or partial refinancing of a debt position granted to a borrower that presents indicators of financial difficulty such as to prevent meeting the original contractual terms.

The forbore performing classification remains in place until the joint fulfilment of the conditions set forth in the "Policies on the classification and valuation of loans to ordinary customers" is verified, and requires automatic inclusion of the account concerned in stage 2.

If a forbore performing loan is coming from forbore non-performing status and is subject to another "forbearance" measure or has a delay exceeding 30 consecutive days, it must be classified in the most appropriate category of non-performing loans (unlikely to pay or bad loans). The individual forbore credit line must be reported within its respective category of non-performing loans as a "forbore non-performing exposure".

The classification of "forbore non-performing exposure" is removed when the customer is reclassified to performing (with the transfer of the line from forbore non-performing to forbore performing) when the following conditions are simultaneously met:

- following the forbearance measure, there is no past-due debt;



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

- following an adequate and circumstantiated analysis of the borrower's overall financial position, there is a positive assessment concerning the capacity to fully meet the obligation subject to the forbearance measure and the elimination of the conditions for the maintenance of its classification within non-performing loans;
- at least one year has passed ("observation period") since the classification in forborne non-performing loans.

After its reclassification to "performing loans", the forborne line relating to a loan previously classified as forborne non-performing is governed according to what is set forth for forborne performing exposures.



1.1 CREDIT RISK

BAD LOANS - BREAKDOWN BY EXPOSURE	31/12/2024				31/12/2023			
	Amount	No. Posit.	% of tot. No.	% of tot. Amt.	Amount	No. Posit.	% of tot. No.	% of tot. Amt.
up to € 10 thousand	4,505	1,876	65.25%	4.61%	4,266	2,412	66.69%	3.56%
from € 10 to € 50 thousand	14,278	651	22.64%	14.62%	16,502	711	19.66%	13.76%
from € 50 to € 250 thousand	29,164	271	9.43%	29.86%	43,234	391	10.81%	36.06%
from € 250 to € 500 thousand	14,836	43	1.50%	15.19%	24,581	71	1.96%	20.50%
from € 500 to € 2,500 thousand	28,787	32	1.11%	29.48%	25,897	30	0.83%	21.60%
more than € 2,500 thousand	6,089	2	0.07%	6.23%	5,430	2	0.06%	4.53%
Total	97,659	2,875	100.00%	100.00%	119,910	3,617	100.00%	100.00%

BAD LOANS - BREAKDOWN BY AGEING	31/12/2024				31/12/2023			
	Amount	No. posit.	% of tot. No.	% of tot. Amt.	Amount	No. posit.	% of tot. No.	% of tot. Amt.
arising in 2024	50,211	518	18.02%	51.41%				
arising in 2023	16,446	638	22.19%	16.84%	43,764	797	22.03%	36.50%
arising in 2022	5,899	553	19.23%	6.04%	16,058	813	22.48%	13.39%
arising in 2021	6,840	318	11.06%	7.00%	22,669	567	15.68%	18.91%
arising in 2020	2,840	148	5.15%	2.91%	12,903	306	8.46%	10.76%
arising in 2019	3,209	134	4.66%	3.29%	4,546	204	5.64%	3.79%
arising in 2018	1,635	86	2.99%	1.67%	2,771	145	4.01%	2.31%
arising in 2017	977	53	1.84%	1.00%	1,323	87	2.41%	1.10%
arising in 2016	3,526	80	2.78%	3.61%	4,706	116	3.21%	3.92%
arising in 2015	926	54	1.88%	0.95%	2,167	93	2.57%	1.81%
arising until the end of 2014	5,150	293	10.19%	5.27%	9,003	489	13.52%	7.51%
Total	97,659	2,875	100.00%	100.00%	119,910	3,617	100.00%	100.00%

The tables above do not include interest on arrears considered entirely non-recoverable for € 5,445 thousand.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

QUANTITATIVE INFORMATION

A. CREDIT QUALITY

**A.1 NON-PERFORMING AND PERFORMING CREDIT EXPOSURES:
AMOUNTS, WRITE-DOWNS, CHANGES, DISTRIBUTION BY BUSINESS
ACTIVITY**

A.1.1 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF FINANCIAL ASSETS BY PAST DUE RANGES (BOOK VALUE)	Stage 1			Stage 2			Stage 3			purchased or originated credit impaired		
	1 to 30 days	Over 30 to 90 days	Over 90 days	1 to 30 days	Over 30 to 90 days	Over 90 days	1 to 30 days	Over 30 to 90 days	Over 90 days	1 to 30 days	Over 30 to 90 days	Over 90 days
1. Financial assets measured at amortised cost	21,353	0	0	17,807	16,093	3,010	6,509	9,424	126,965	154	84	390
2. Financial assets measured at fair value through other comprehensive income	0	0	0	2	5	0	0	36	3,065	0	0	0
Total 2024	21,353	0	0	17,809	16,098	3,010	6,509	9,460	130,030	154	84	390
Total 2023	17,343	0	0	12,921	49,930	4,395	1,880	14,031	119,735	141	130	6,887



**PART E
INFORMATION ON
RISKS AND
RELATIVE HEDGING
POLICIES**

1.1 CREDIT RISK

A.1.2 FINANCIAL ASSETS, COMMITMENTS TO DISBURSE FUNDS AND FINANCIAL GUARANTEES GIVEN: CHANGES IN OVERALL VALUE ADJUSTMENTS AND TOTAL PROVISIONS	Overall value adjustments											
	Assets included in stage 1						Assets included in stage 2					
	Loans and advances to banks and Central Banks: on demand	Financial assets measured at amortised cost	Financial assets measured at fair value through other comprehensive income	Financial assets held for sale	of which: individual write-downs	of which: collective write-downs	Loans and advances to banks and Central Banks: on demand	Financial assets measured at amortised cost	Financial assets measured at fair value through other comprehensive income	Financial assets held for sale	of which: individual write-downs	of which: collective write-downs
Opening balance of overall adjustments	0	19,037	359	0	0	19,396	0	36,479	0	0	0	36,479
Increases from purchased or originated credit impaired financial assets	0	4,862	116	0		4,978	0	830	0	0	0	830
Derecognitions other than write-offs	0	-1,269	-5	0	0	-1,274	0	-1,029	0	0	0	-1,029
Net adjustments/recoveries for credit risk (+/-)	0	-4,375	-155	0	0	-4,530	0	-5,703	0	0	0	-5,703
Contractual changes without derecognition	0	-20	0	0	0	-20	0	-15	0	0	0	-15
Changes in estimation method	0	0	0	0	0	0	0	0	0	0	0	0
Write-offs not directly recorded in the income statement	0	0	0	0	0	0	0	0	0	0	0	0
Other changes	0	-60	-9	0		-69	0	0	0	0	0	0
Closing balance of overall adjustments	0	18,175	306	0	0	18,481	0	30,562	0	0	0	30,562
Recoveries from collections of financial assets subject to write-offs	0	0	0	0	0	0	0	0	0	0	0	0
Write-offs directly recorded in the income statement	0	0	0	0	0	0	0	0	0	0	0	0

(Continued)

Overall value adjustments											Total provisions for commitments to disburse funds and financial guarantees given				Total
Assets included in stage 3						Purchased or originated credit impaired financial assets									
Loans and advances to banks and Central Banks: on demand	Financial assets measured at amortised cost	Financial assets measured at fair value through other comprehensive income	Financial assets held for sale	of which: individual write-downs	of which: collective write-downs	Financial assets measured at amortised cost	Financial assets measured at fair value through other comprehensive income	Financial assets held for sale	of which: individual write-downs	of which: collective write-downs	Stage 1	Stage 2	Stage 3	Commitments to disburse funds and financial guarantees issued - purchased or originated credit	
0	140,073	1,522	0	141,595	0	16,558	0	0	16,293	265	741	387	3,844	0	219,000
0	2,314		0	2,314	0	X	X	X	X	X	363	120	3	0	8,608
0	-2,305	-254	0	-2,559	0	-4	0	0	-4	0	-184	-130	-11	0	-5,191
0	55,288	-107	0	55,181	0	-14,254	0	0	-15,863	1,609	-310	37	3,356	0	33,777
0	262		0	262	0	0	0	0	0	0	0	0	0	0	227
0			0	0	0	0	0	0	0	0	0	0	0	0	0
0	-18,271	0	0	-18,271	0	-127	0	0	0	-127	0	0	0	0	-18,398
0	-124	-46	0	-170	0	0	0	0	0	0	0	0	0	0	-239
0	177,237	1,115	0	178,352	0	2,173	0	0	426	1,747	610	414	7,192	0	237,784
0	5,626	0	0	5,626	0	277	0	0	0	277	0	0	0	0	5,903
0	-2,575	0	0	-8,970	0	-113	0	0	0	-113	0	0	7	0	-2,681



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES **1.1 CREDIT RISK**

A.1.3 PRUDENTIAL CONSOLIDATION - FINANCIAL ASSETS, COMMITMENTS TO DISBURSE FUNDS AND FINANCIAL GUARANTEES GIVEN: TRANSFERS BETWEEN THE DIFFERENT CREDIT RISK STAGES (GROSS AND NOMINAL VALUES)	Gross exposure/nominal value					
	Transfers between stage 1 and stage 2		Transfers between stage 2 and stage 3		Transfers between stage 1 and stage 3	
	From stage 1 to stage 2	From stage 2 to stage 1	From stage 2 to stage 3	From stage 3 to stage 2	From stage 1 to stage 3	From stage 3 to stage 1
Portfolios/risk stages						
1. Financial assets measured at amortised cost	275,842	235,784	130,932	1,985	142,677	5,056
2. Financial assets measured at fair value through other comprehensive income	8	2	0	2	971	45
3. Financial assets held for sale	0	0	0	0	0	0
4. Commitments to disburse funds and financial guarantees given	20,620	5,790	3,074	7	15,815	6
Total 2024	296,470	241,576	134,006	1,994	159,463	5,107
Total 2023	347,264	233,096	80,128	7,767	48,468	3,169



1.1 CREDIT RISK

A.1.4 PRUDENTIAL CONSOLIDATION - BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO BANKS: GROSS AND NET AMOUNTS Type of exposure/amounts	Gross exposure					Overall value adjustments and total provisions					Net exposure	Total partial write-offs*
		Stage 1	Stage 2	Stage 3	purchased or originated credit impaired		Stage 1	Stage 2	Stage 3	purchased or originated credit impaired		
A. BALANCE SHEET CREDIT EXPOSURES												
A.1 ON DEMAND	836,327	836,235	92	0	0	0	0	0	0	0	836,327	0
a) Non-performing	0	X	0	0	0	0	X	0	0	0	0	0
b) Performing	836,327	836,235	92	X	0	0	0	0	X	0	836,327	0
A.2 OTHER	148,876	145,501	3,300	0	0	1	1	0	0	0	148,875	0
a) Bad loans	0	X	0	0	0	0	X	0	0	0	0	0
- of which: forborne exposures	0	X	0	0	0	0	X	0	0	0	0	0
b) Unlikely to pay	0	X	0	0	0	0	X	0	0	0	0	0
- of which: forborne exposures	0	X	0	0	0	0	X	0	0	0	0	0
c) Non-performing past due exposures	0	X	0	0	0	0	X	0	0	0	0	0
- of which: forborne exposures	0	X	0	0	0	0	X	0	0	0	0	0
d) Performing past due exposures	0	0	0	X	0	0	0	0	X	0	0	0
- of which: forborne exposures	0	0	0	X	0	0	0	0	X	0	0	0
e) Other performing exposures	148,876	145,501	3,300	X	0	1	1	0	X	0	148,875	0
- of which: forborne exposures	0	0	0	X	0	0	0	0	X	0	0	0
TOTAL (A)	985,203	981,736	3,392	0	0	1	1	0	0	0	985,202	0
B. OFF-BALANCE SHEET CREDIT EXPOSURES												
a) Non-performing	0	X	0	0	0	0	X	0	0	0	0	0
b) Performing	31,281	28,396	0	X	0	0	0	0	X	0	31,281	0
TOTAL (B)	31,281	28,396	0	0	0	0	0	0	0	0	31,281	0
TOTAL (A+B)	1,016,484	1,010,132	3,392	0	0	1	1	0	0	0	1,016,483	0

* Value to be presented for disclosure purposes

The balance sheet exposures include loans to banks recorded in items 20 a), 20 c), 30 and 40 a).

The off-balance sheet exposures include all financial transactions other than balance sheet transactions (financial guarantees, commitments, derivatives) which involve the assumption of credit risk.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES **1.1 CREDIT RISK**

A.1.5 BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS: GROSS AND NET AMOUNTS Type of exposure/Amounts	Gross exposure					Overall value adjustments and total provisions					Net exposure	Total partial write-offs *
		Stage 1	Stage 2	Stage 3	purchased or originated credit impaired		Stage 1	Stage 2	Stage 3	purchased or originated credit impaired		
A. BALANCE SHEET CREDIT EXPOSURES												
a) Bad loans	97,659	X	0	96,747	913	64,860	X	0	64,170	690	32,799	24,663
- of which: forborne exposures	26,306	X	0	25,842	473	18,387	X	0	18,102	285	7,919	2,068
b) Unlikely to pay	259,253	X	0	257,143	2,109	108,505	X	0	107,474	1,031	150,748	0
- of which: forborne exposures	97,521	X	0	95,992	1,548	37,903	X	0	37,055	848	59,618	0
c) Non-performing past due exposures	36,552	X	0	36,457	95	6,734	X	0	6,708	26	29,818	0
- of which: forborne exposures	850	X	0	830	20	200	X	0	192	8	650	0
d) Performing past due exposures	62,844	21,460	39,167	X	143	2,740	107	2,250	X	10	60,104	0
- of which: forborne exposures	6,120	0	6,047	X	73	472	0	464	X	8	5,648	0
e) Other performing exposures	10,202,756	9,559,362	544,437	X	6,602	47,101	18,373	28,312	X	416	10,155,655	0
- of which: forborne exposures	98,336	1	94,712	X	3,598	7,019	0	6,700	X	319	91,317	0
TOTAL (A)	10,659,064	9,580,822	583,604	390,347	9,862	229,940	18,480	30,562	178,352	2,173	10,429,124	24,663
B. OFF-BALANCE SHEET CREDIT EXPOSURES												
a) Non-performing	33,022	X	0	33,022	0	7,192	X	0	7,192	0	25,830	0
b) Performing	1,795,492	1,713,027	32,812	X	0	1,024	610	414	X	0	1,794,468	0
TOTAL (B)	1,828,514	1,713,027	32,812	33,022	0	8,216	610	414	7,192	0	1,820,298	0
TOTAL (A+B)	12,487,578	11,293,849	616,416	423,369	9,862	238,156	19,090	30,976	185,544	2,173	12,249,422	24,663

* Value to be presented for disclosure purposes

The balance sheet exposures include loans to customers recorded in items 20 a) and 20 c), 30 and 40 b), as well as other financial assets comprised of non-banking securities included in items 20 c) and 30 of balance sheet assets; excluding equity securities and UCITS units.

The off-balance sheet exposures include all financial transactions other than balance sheet transactions (financial guarantees, commitments, derivatives).



1.1 CREDIT RISK

A.1.6 Prudential consolidation – Balance sheet credit exposures to banks: changes in gross non-performing exposures Source/Categories	Bad loans	Unlikely to pay	Non-performing past due exposures
A. Gross exposure, opening balance	0	6	0
- of which: transferred but not derecognised	0	0	0
B. Increases	0	0	0
B.1 transfers from performing loans	0		0
B.2 transfers from purchased or originated credit impaired financial assets	0	0	0
B.3 transfers from other categories of non-performing exposures	0	0	0
B.4 contractual changes without derecognition	0	0	0
B.5 other increases	0	0	0
C. Decreases	0	6	0
C.1 transfers to performing loans	0	4	0
C.2 write-offs	0	0	0
C.3 collections	0	0	0
C.4 amount realised upon disposal of positions	0	0	0
C.5 losses on disposal	0	0	0
C.6 transfers to other categories of non-performing exposures	0	0	0
C.7 Contractual changes without derecognition	0	0	0
C.8 other decreases	0	2	0
D. Gross exposure, closing balance	0	0	0
- of which: transferred but not derecognised	0	0	0

A.1.7 PRUDENTIAL CONSOLIDATION - BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS: CHANGES IN GROSS NON-PERFORMING EXPOSURES Source/Categories	Bad loans	Unlikely to pay	Non-performing past due exposures
A. Gross exposure, opening balance	119,910	168,464	43,260
- of which: transferred but not derecognised	13,833	28,550	28,534
B. Increases	143,429	375,236	80,423
B.1 transfers from performing loans	6,142	282,468	73,928
B.2 transfers from purchased or originated credit impaired financial assets	446	202	197
B.3 transfers from other categories of non-performing exposures	130,917	74,921	4,780
B.4 contractual changes without derecognition	90	453	0
B.5 other increases	5,834	17,192	1,518
C. Decreases	165,680	284,447	87,131
C.1 transfers to performing loans	928	104,696	4,142
C.2 write-offs	31,851	1	1
C.3 collections	16,025	37,625	9,097
C.4 amount realised upon disposal of positions	42,221	2,106	10
C.5 losses on disposal	22,068	1,000	0
C.6 transfers to other categories of non-performing exposures	4,709	132,194	73,715
C.7 Contractual changes without derecognition	0	192	0
C.8 other decreases	47,878	6,633	166
D. Gross exposure, closing balance	97,659	259,253	36,552
- of which: transferred but not derecognised	21,530	41,385	11,894



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

A.1.7 BIS PRUDENTIAL CONSOLIDATION – BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS: CHANGES IN GROSS FORBORNE EXPOSURES BY CREDIT QUALITY	Forborne: non-performing	Forborne: performing
Type/Quality		
A. Gross exposure, opening balance	126,995	191,960
- of which: transferred but not derecognised	13,725	78,752
B. Increases	71,145	80,572
B.1 transfers from non-forborne performing loans	915	43,740
B.2 transfers from forborne performing loans	39,231	X
B.3 transfers from forborne non-performing loans	X	1,437
B.4 transfers from non-forborne non-performing loans	27,482	26,737
B.5 other increases	3,517	8,658
C. Decreases	73,463	168,076
C.1 transfers to non-forborne performing loans	X	62,355
C.2 transfers to forborne performing loans	1,437	X
C.3 transfers to forborne non-performing loans	X	39,231
C.4 write-offs	9,769	0
C.5 collections	9,960	15,625
C.6 amount realised upon disposal of positions	18,729	0
C.7 losses on disposal	9,305	0
C.8 other decreases	24,263	50,865
D. Gross exposure, closing balance	124,677	104,456
- of which: transferred but not derecognised	22,183	49,996

A.1.9 PRUDENTIAL CONSOLIDATION - BALANCE SHEET NON-PERFORMING CREDIT EXPOSURES TO CUSTOMERS: CHANGES IN OVERALL VALUE ADJUSTMENTS	Bad loans		Unlikely to pay		Non-performing past due exposures	
Source/Categories	Total	of which: forborne exposures	Total	of which: forborne exposures	Total	of which: forborne exposures
A. Opening balance of overall adjustments	78,377	23,173	70,597	38,917	8,915	1,072
- of which: transferred but not derecognised	8,193	1,416	6,660	3,878	2,087	60
B. Increases	105,051	41,838	98,501	25,141	6,270	264
B.1 value adjustments purchased or originated credit impaired assets	244	X	350	X	23	X
B.2 other value adjustments	30,258	14,242	93,488	24,224	5,468	187
B.3 losses on disposal	22,068	9,305	1,000	0	0	0
B.4 transfers from other categories of non-performing exposures	43,241	16,022	3,456	838	357	77
B.5 contractual changes without derecognition	0	0	0	0	0	0
B.6 other increases	9,240	2,269	207	79	422	0
C. Decreases	118,568	46,624	60,593	26,155	8,451	1,136
C.1 write-backs from valuation	4,468	1,044	10,648	6,075	717	12
C.2 write-backs from collection	13,014	2,136	5,564	4,207	1,037	60
C.3 gains on disposal	0	0	0	0	0	0
C.4 write-offs	31,851	9,769	1	0	1	0
C.6 transfers to other categories of non-performing exposures	164	0	40,058	15,873	6,832	1,064
C.6 contractual changes without derecognition	0	0	0	0	0	0
C.7 other decreases	69,071	33,675	4,322	0	136	0
D. Closing balance of overall adjustments	64,860	18,387	108,505	37,903	6,734	200
- of which: transferred but not derecognised	13,238	4,920	11,046	4,004	2,304	37



1.1 CREDIT RISK

A.2 CLASSIFICATION OF EXPOSURES BY EXTERNAL AND INTERNAL RATINGS

A.2.1 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF FINANCIAL ASSETS, COMMITMENTS TO DISBURSE FUNDS AND FINANCIAL GUARANTEES GIVEN BY EXTERNAL RATING CLASSES (GROSS VALUES) Exposures	External rating classes						No rating	Total
	class 1	class 2	class 3	class 4	class 5	class 6		
A. Financial assets measured at amortised cost	148,764	13,481	1,647,232	0	0	0	7,965,815	9,775,292
- Stage 1	148,764	13,481	1,647,232	0	0	0	6,982,936	8,792,413
- Stage 2	0	0	0	0	0	0	586,896	586,896
- Stage 3	0	0	0	0	0	0	386,121	386,121
- purchased or originated credit impaired	0	0	0	0	0	0	9,862	9,862
B. Financial assets measured at fair value through other comprehensive income	202,035	40	721,524	0	0	0	14,545	938,144
- Stage 1	202,035	40	721,524	0	0	0	10,311	933,910
- Stage 2	0	0	0	0	0	0	8	8
- Stage 3	0	0	0	0	0	0	4,226	4,226
- purchased or originated credit impaired	0	0	0	0	0	0	0	0
C. Financial assets held for sale	0	0	0	0	0	0	2,375	2,375
- Stage 1	0	0	0	0	0	0	2,375	2,375
- Stage 2	0	0	0	0	0	0	0	0
- Stage 3	0	0	0	0	0	0	0	0
- purchased or originated credit impaired	0	0	0	0	0	0	0	0
Total (A+B+C)	350,799	13,521	2,368,756	0	0	0	7,982,735	10,715,811
of which: purchased or originated credit impaired financial assets								
D. Commitments to disburse funds and financial guarantees given	5	3	0	0	0	0	1,648,889	1,648,897
- Stage 1	0	0	0	0	0	0	29,711	29,711
- Stage 2	0	0	0	0	0	0	25,223	25,223
- Stage 3	0	0	0	0	0	0	0	0
- purchased or originated credit impaired	5	3	0	0	0	0	1,703,823	1,703,831
Total (D)	350,804	13,524	2,368,756	0	0	0	9,686,558	12,419,642
Total (A+B+C+D)	148,764	13,481	1,647,232	0	0	0	7,965,815	9,775,292

Credit rating classes	ECAI
	Moody's
1	from Aaa to Aa3
2	from A1 to A3
3	from Baa1 to Baa3
4	from Ba1 to Ba3
5	from B1 to B3
6	Caa1 and lower



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

A.2.2 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF FINANCIAL ASSETS, COMMITMENTS TO DISBURSE FUNDS AND FINANCIAL GUARANTEES GIVEN BY INTERNAL RATING CLASSES (GROSS VALUES)	Internal rating classes					
	class 1	class 2	class 3	class 4	class 5	class 6
Exposures						
A. Financial assets measured at amortised cost	721,962	781,818	943,694	1,104,684	1,002,306	748,865
- Stage 1	721,944	779,995	940,719	1,102,352	994,408	714,975
- Stage 2	18	1,594	2,890	1,867	7,510	32,865
- Stage 3	0	0	0	0	0	0
- purchased or originated credit impaired	0	229	85	465	388	1,025
B. Financial assets measured at fair value through other comprehensive income	0	0	0	0	0	0
- Stage 1	0	0	0	0	0	0
- Stage 2	0	0	0	0	0	0
- Stage 3	0	0	0	0	0	0
- purchased or originated credit impaired	0	0	0	0	0	0
C. Financial assets held for sale	0	0	0	0	0	0
- Stage 1	0	0	0	0	0	0
- Stage 2	0	0	0	0	0	0
- Stage 3	0	0	0	0	0	0
- purchased or originated credit impaired	0	0	0	0	0	0
Total (A+B+C)	721,962	781,818	943,694	1,104,684	1,002,306	748,865
D. Commitments to disburse funds and financial guarantees given	547,984	245,468	209,650	245,682	89,640	248,084
- Stage 1	547,984	245,468	208,668	245,668	88,934	247,400
- Stage 2	0	0	982	14	706	684
- Stage 3	0	0	0	0	0	0
- purchased or originated credit impaired	0	0	0	0	0	0
Total (D)	547,984	245,468	209,650	245,682	89,640	248,084
Total (A+B+C+D)	1,269,946	1,027,286	1,153,344	1,350,366	1,091,946	996,949

(Continued)



1.1 CREDIT RISK

Internal rating classes						Total
class 7	class 8	class 9	class 10	class 11	no rating	
360,624	111,995	181,400	125,498	346,044	3,346,402	9,775,292
235,820	25,625	86,463	0	0	3,190,112	8,792,413
124,205	86,158	91,607	125,086	0	113,096	586,896
0	0	0	0	342,927	43,194	386,121
599	212	3,330	412	3,117	0	9,862
0	0	0	0	0	938,144	938,144
0	0	0	0	0	933,910	933,910
0	0	0	0	0	8	8
0	0	0	0	0	4,226	4,226
0	0	0	0	0	0	0
0	0	0	0	0	2,375	2,375
0	0	0	0	0	2,375	2,375
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
360,624	111,995	181,400	125,498	346,044	4,286,921	10,715,811
24,558	12,527	4,841	11,405	25,221	38,771	1,703,831
21,677	7,583	431	0	0	35,084	1,648,897
2,881	4,944	4,410	11,405	0	3,685	29,711
0	0	0	0	25,221	2	25,223
0	0	0	0	0	0	0
24,558	12,527	4,841	11,405	25,221	38,771	1,703,831
385,182	124,522	186,241	136,903	371,265	4,325,692	12,419,642

Internal ratings are not used in the capital requirements calculation.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

A.3 BREAKDOWN OF SECURED EXPOSURES BY TYPE OF COLLATERAL

A.3.2 PRUDENTIAL CONSOLIDATION - SECURED BALANCE SHEET AND OFF- BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS	Gross exposure	Net exposure	Collateral (1)				Personal guarantees (2)	
			Property - Mortgages	Property - Lease loans	Securities	Other collateral	Credit derivatives	
							CLN	Other derivatives Central Counterparties
1. Secured balance sheet credit exposures:	6,419,714	6,217,711	3,281,216	0	84,881	24,768	0	0
1.1 totally secured	5,889,625	5,706,013	3,258,378	0	65,873	21,362	0	0
- of which: non-performing	331,882	188,446	123,574	0	799	170	0	0
1.2 partially secured	530,089	511,698	22,838	0	19,008	3,406	0	0
- of which: non-performing	28,096	11,212	1,485	0	388	27	0	0
2. Secured off-balance sheet credit exposures:	584,703	578,332	4,565	0	23,307	10,949	0	0
2.1 totally secured	420,038	413,944	4,282	0	17,157	9,758	0	0
- of which: non-performing	14,843	9,298	3	0	100	625	0	0
2.2 partially secured	164,665	164,388	283	0	6,150	1,191	0	0
- of which: non-performing	9,363	9,190	0	0	29	0	0	0

(Continued)

	Personal guarantees (2)							Total (1)+(2)
	Credit derivatives			Signature loans				
	Other derivatives			Public administration	Banks	Other financial companies	Other entities	
	Banks	Other financial	Other entities					
1. Secured balance sheet credit exposures:	0	0	0	941,083	0	1,136,089	615,413	6,083,450
1.1 totally secured	0	0	0	642,775	0	1,134,664	580,651	5,703,703
- of which: non-performing	0	0	0	21,750	0	30,976	10,914	188,183
1.2 partially secured	0	0	0	298,308	0	1,425	34,762	379,747
- of which: non-performing	0	0	0	5,658	0	38	2,148	9,744
2. Secured off-balance sheet credit exposures:	0	0	0	94,972	0	10,214	382,415	526,422
2.1 totally secured	0	0	0	51,159	0	4,672	326,911	413,939
- of which: non-performing	0	0	0	896	0	15	7,657	9,296
2.2 partially secured	0	0	0	43,813	0	5,542	55,504	112,483
- of which: non-performing	0	0	0	567	0	0	3,191	3,787



1.1 CREDIT RISK

B. DISTRIBUTION AND CONCENTRATION OF CREDIT EXPOSURES

B.1 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS BY BUSINESS SEGMENT	Public administration		Financial companies		Financial companies (of which: insurance companies)	
	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments
A. Balance sheet credit exposures						
A.1 Bad loans	253	99	83	542	0	0
- of which: forborne exposures	0	0	0	0	0	0
A.2 Unlikely to pay	243	39	160	474	21	2
- of which: forborne exposures	0	0	0	61	0	0
A.3 Non-performing past due exposures	3,142	754	1	10	0	0
- of which: forborne exposures	0	0	0	0	0	0
A.4 Performing exposures	2,945,170	1,143	137,808	2,490	4,668	85
- of which: forborne exposures	0	0	0	0	0	0
Total (A)	2,948,808	2,035	138,052	3,516	4,689	87
B. Off-balance sheet credit exposures						
B.1 Non-performing exposures	0	0	0	0	0	0
B.2 Performing exposures	215,425	3	50,248	43	0	0
Total (B)	215,425	3	50,248	43	0	0
Total (A+B) 2024	3,164,233	2,038	188,300	3,559	4,689	87
Total (A+B) 2023	2,839,439	1,840	360,487	3,075	6,122	152

(Continued)

B.1 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS BY BUSINESS SEGMENT	Non-financial companies		Households	
	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments
A. Balance sheet credit exposures				
A.1 Bad loans	16,334	35,527	16,129	28,692
- of which: forborne exposures	3,656	9,144	4,263	9,243
A.2 Unlikely to pay	81,109	83,063	69,236	24,929
- of which: forborne exposures	32,099	27,996	27,519	9,846
A.3 Non-performing past due exposures	4,470	1,526	22,205	4,444
- of which: forborne exposures	298	112	352	88
A.4 Performing exposures	2,590,756	18,815	4,542,025	27,393
- of which: forborne exposures	39,736	3,235	57,229	4,256
Total (A)	2,692,669	138,931	4,649,595	85,458
B. Off-balance sheet credit exposures				
B.1 Non-performing exposures	24,884	7,153	946	39
B.2 Performing exposures	1,286,041	641	242,754	337
Total (B)	1,310,925	7,794	243,700	376
Total (A+B) 2024	4,003,594	146,725	4,893,295	85,834
Total (A+B) 2023	3,890,073	114,285	4,883,967	100,041



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES **1.1 CREDIT RISK**

B.2 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS BY GEOGRAPHIC AREA	Italy		Other European countries		America		Asia		Rest of the world	
	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments
Exposures/Geographic areas										
A. Balance sheet credit exposures										
A.1 Bad loans	32,586	63,911	213	949	0	0	0	0	0	0
A.2 Unlikely to pay	150,562	108,448	63	28	1	4	122	24	0	1
A.3 Non-performing past due exposures	29,811	6,729	5	3	1	1	1	1	0	0
A.4 Performing exposures	9,415,486	49,363	701,419	460	335	3	78	0	98,441	15
Total (A)	9,628,445	228,451	701,700	1,440	337	8	201	25	98,441	16
B. Off-balance sheet credit exposures										
B.1 Non-performing exposures	25,830	7,192	0	0	0	0	0	0	0	0
B.2 Performing exposures	1,791,704	1,024	1,032	0	1,006	0	49	0	677	0
Total (B)	1,817,534	8,216	1,032	0	1,006	0	49	0	677	0
Total (A+B) 2024	11,445,979	236,667	702,732	1,440	1,343	8	250	25	99,118	16
Total (A+B) 2023	11,523,941	217,894	447,248	1,287	1,373	2	235	56	1,169	2

B.2 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF BALANCE SHEET AND OFF- BALANCE SHEET CREDIT EXPOSURES TO CUSTOMERS BY GEOGRAPHIC AREA	North West Italy		North East Italy		Central Italy		South Italy and Islands	
	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments
Exposures/Geographic areas								
A. Balance sheet credit exposures								
A.1 Bad loans	27,397	58,949	1,340	1,626	1,362	1,016	2,487	2,320
A.2 Unlikely to pay	127,165	97,464	5,108	1,454	12,890	8,528	5,399	1,002
A.3 Non-performing past due exposures	19,484	4,969	2,737	448	2,196	342	5,394	970
A.4 Performing exposures	6,076,818	42,366	427,340	2,395	2,532,871	2,875	378,457	1,727
Total (A)	6,250,864	203,748	436,525	5,923	2,549,319	12,761	391,737	6,019
B. Off-balance sheet credit exposures								
B.1 Non-performing exposures	22,336	6,229	1,272	9	2,197	954	25	0
B.2 Performing exposures	1,661,970	895	93,324	73	30,906	54	5,504	2
Total (B)	1,684,306	7,124	94,596	82	33,103	1,008	5,529	2
Total (A+B) 2024	7,935,170	210,872	531,121	6,005	2,582,422	13,769	397,266	6,021
Total (A+B) 2023	7,957,773	202,700	471,308	5,431	2,710,253	4,647	384,607	5,116



1.1 CREDIT RISK

B.3 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO BANKS BY GEOGRAPHIC AREA Exposures/Geographic areas	Italy		Other European countries		America		Asia		Rest of the world	
	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments
A. Balance sheet credit exposures										
A.1 Bad loans	0	0	0	0	0	0	0	0	0	0
A.2 Unlikely to pay	0	0	0	0	0	0	0	0	0	0
A.3 Non-performing past due exposures	0	0	0	0	0	0	0	0	0	0
A.4 Performing exposures	924,777	1	51,659	0	8,733	0	33	0	0	0
Total (A)	924,777	1	51,659	0	8,733	0	33	0	0	0
B. Off-balance sheet credit exposures										
B.1 Non-performing exposures	0	0	0	0	0	0	0	0	0	0
B.2 Performing exposures	31,273	0	8	0	0	0	0	0	0	0
Total (B)	31,273	0	8	0	0	0	0	0	0	0
Total (A+B) 2024	956,050	1	51,667	0	8,733	0	33	0	0	0
Total (A+B) 2023	698,191	1	106,603	0	7,010	0	26	0	1	0

B.3 PRUDENTIAL CONSOLIDATION - BREAKDOWN OF BALANCE SHEET AND OFF-BALANCE SHEET CREDIT EXPOSURES TO BANKS BY GEOGRAPHIC AREA Exposures/Geographic areas	North West Italy		North East Italy		Central Italy		South Italy and Islands	
	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments	Net exposure	Overall value adjustments
A. Balance sheet credit exposures								
A.1 Bad loans	0	0	0	0	0	0	0	0
A.2 Unlikely to pay	0	0	0	0	0	0	0	0
A.3 Non-performing past due exposures	0	0	0	0	0	0	0	0
A.4 Performing exposures	32,635	1	17	0	891,978	0	147	0
Total (A)	32,635	1	17	0	891,978	0	147	0
B. Off-balance sheet credit exposures								
B.1 Non-performing exposures	0	0	0	0	0	0	0	0
B.2 Performing exposures	31,250	0	0	0	23	0	0	0
Total (B)	31,250	0	0	0	23	0	0	0
Total (A+B) 2024	63,885	1	17	0	892,001	0	147	0
Total (A+B) 2023	616,694	1	5	0	81,320	0	172	0

B.4 LARGE EXPOSURES	2024 - Cassa di Risparmio di Asti S.p.A. Group Consolidation
Number of positions	8
Amount (nominal value)	5,587,787
Amount (weighted value)	538,099



The large risks reported to the Bank of Italy consist of:

- exposures to the Italian Government relating to the nominal value of € 2,796,470 thousand in securities held in the portfolio and DTA, with an overall weighting of € 127,297 thousand;
- exposures to credit institutions, financial institutions and SGRs (asset management companies) for a nominal amount of € 879,661 thousand, with an overall weighting of € 3,962 thousand;
- exposure to other state administrations for a nominal amount of € 810,077 thousand and with a weighting of € 181,840 thousand;
- exposure to the Bank of Italy for a nominal amount of € 1,101,578 thousand and with an overall weighting of € 225,000 thousand.

C. SECURITISATION TRANSACTIONS

QUALITATIVE AND QUANTITATIVE INFORMATION

SECURITISATION OF PERFORMING LOANS

The merger by incorporation of the company Biverbanca S.p.A. into Cassa di Risparmio di Asti S.p.A. took effect from 6 November 2021, effective for accounting and tax purposes from 1 January 2021. Prior to that date, Cassa di Risparmio di Asti S.p.A. together with Biverbanca S.p.A. carried out three multi-originator securitisation transactions, of which only two still in existence; for this reason, in order to give a true and fair view of the situation, in the following paragraphs the subdivision between the companies Biverbanca S.p.A. and Cassa di Risparmio di Asti S.p.A. will be maintained, limited to the two securitisation transactions carried out prior to the merger and still active.

Cassa di Risparmio di Asti S.p.A. (originator) has carried out nine securitisation transactions on its own behalf: the first three were carried out with the same special purpose vehicle named Asti Finance S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 08569601001, entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 33061.3, established pursuant to Italian Law 130/99; two of these transactions were closed early on 27 September 2017 and 27 May 2021, respectively. The fourth transaction (also closed early in April 2014) was carried out with the special purpose vehicle Asti P.M.I. S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 11663011002, registered in the List of special purpose vehicles established pursuant to Article 4 of the Measure issued by the Bank of Italy on 29/04/2011 at no. 35012.4; the fifth transaction (closed early in 2023) with the special purpose vehicle Asti RMBS S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 12063261007, registered in the List of special purpose securitisation vehicles established pursuant to Article 4 of the Measure issued by the Bank of Italy on 29/04/2011 at no. 35045.4; the sixth transaction (closed early in October 2016) was with the special purpose vehicle Asti P.M.I. S.r.l., with registered office in Rome, Via Curtatone no. 3,



1.1 CREDIT RISK

registered in the Rome Register of Companies no. 11663011002, registered in the List of special purpose securitisation vehicles established pursuant to Article 4 of the Measure issued by the Bank of Italy on 29/04/2011 at no. 35012.4. The seventh transaction (tenth securitisation) was carried out in December 2021, with the vehicle company called Asti Group RMBS III S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 16326891005 and registered in the List of special purpose securitisation vehicles established at the Bank of Italy, pursuant to Article 4 of the Measure issued on 29/04/2011, under no. 35845.7 (all hereinafter referred to as SPV); the eighth transaction (eleventh securitisation) was carried out in September 2024, with the vehicle company Asti Group RMBS IV, with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 17676691003 and registered in the List of special purpose securitisation vehicles established by the Bank of Italy, pursuant to Article 4 of the Measure issued on 29/04/2011, under no. 48584.7. Finally, in October 2023 the Bank carried out a new securitisation transaction with the special purpose vehicle Milone CQS S.r.l., with registered office in Conegliano, Via Alfieri 1, registered in the Rome Register of Companies no. 05430850262 and registered in the List of special purpose securitisation vehicles established by the Bank of Italy, pursuant to Article 4 of the Measure issued on 29/04/2011, under no. 48482.4.

Along with Biverbanca S.p.A., Cassa di Risparmio di Asti S.p.A. also performed three multi-originator securitisation transactions, which are now closed: the first in 2015 (seventh transaction closed early in 2023), with the special purpose vehicle named Asti Group RMBS S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 1337083003 and entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Art. 4 of the Measure issued on 29/04/2011 at no. 35187.4. The second multi-originator securitisation transaction (eighth transaction) was concluded in March 2017, with the special purpose vehicle named Asti Group PMI S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 14109461005 and registered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 335330.0. The third multi-originator securitisation transaction (ninth transaction) was concluded in June 2019, with the special purpose vehicle named Asti Group RMBS II S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 152897710 and entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 35584.2.

The eighth transaction (self-securitisation), for which the Bank has subscribed all liabilities issued at the time of issue and still maintains them today, is not described in this section. For a description of those transactions, please refer to section 4 - "Liquidity risk".

For all securitisations, specific servicing agreements have been entered into between Cassa di Risparmio di Asti S.p.A. (and, before the merger, between Biverbanca



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

S.p.A.) and the SPVs, in which the Bank (servicer) was engaged to perform, in the name and on behalf of the SPVs, the activity of administration and collection of loans transferred, as well as manage any debt collection procedures.

As the results/benefits of the above-mentioned securitisation transactions were not fully transferred to the loan transferee (SPV), the Bank, in compliance with IFRS 9, has recognised amongst its assets 100% of the securitised loans, likewise recording a financial liability for the consideration, when received, net of notes repurchased as well as cash reserves. Income from the transferred assets and the expenses of the financial liability net of interest relating to repurchased notes are recognised in the income statement. Therefore, as concerns the monitoring and assessment of the risks connected to securitisations, please refer to the analyses performed in Part E of the Notes to the consolidated financial statements relating to Credit Risk. For the purposes of the application of the accounting standards endorsed with Regulation 1254 by the European Commission, IFRS 10, IFRS 11 and IFRS 12 and the amendments to IAS 27 and IAS 28, applicable on a compulsory basis as of 1 January 2014, the SPVs were included in the scope of line-by-line consolidation of the Group starting from the year 2014.

From the organisational perspective, the Credit Department is responsible for managing administrative/accounting activities relating to securitisation transactions and the periodic production of all reporting required by the servicing agreements. The servicing activities are subject to controls by the Internal Audit Function - Bank Internal Auditing Office, the results of which are submitted to the Board of Directors which reviews them during special meetings with the participation of the Board of Statutory Auditors.

NPL SECURITISATIONS

During the course of 2018, Cassa di Risparmio di Asti S.p.A. finalised along with Biverbanca S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer of a portfolio of bad loans to the special purpose vehicle Maggesi S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 07/06/2017, at no. 35475.3.

During the course of 2019, Cassa di Risparmio di Asti S.p.A. then finalised along with Biverbanca S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer of a portfolio of bad loans to the special purpose vehicle POP NPLs 2019 S.r.l., with registered office in Conegliano (TV), Via Vittorio Alfieri no. 1, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35670.9.

During the course of 2020, Cassa di Risparmio di Asti S.p.A. also finalised along with Biverbanca S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer of



1.1 CREDIT RISK

a portfolio of bad loans to the special purpose vehicle POP NPLs 2020 S.r.l., with registered office in Rome, Via Piemonte no. 38, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35758.2.

During the course of 2021, Cassa di Risparmio di Asti S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, finalised a non-recourse transfer of a portfolio of bad loans to the special purpose vehicle BCC NPLs 2021 S.r.l., with registered office in Conegliano (TV), Via Vittorio Alfieri no. 1, 31015, entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35852.3.

During the course of 2022, Cassa di Risparmio di Asti S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and Italian Law 130/1999 on securitisation, finalised a non-recourse transfer of a portfolio of bad loans to the special purpose vehicle BCC NPLs 2022 S.r.l., with registered office in Conegliano (TV), Via Vittorio Alfieri no. 1, 31015, entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35897.8 and a non-recourse sale transaction of a portfolio of loans classified as non-performing to the special purpose vehicle Luzzatti POP NPLs 2022 S.r.l. with registered office in Conegliano (TV), Via Vittorio Alfieri 1, 31015 registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35986.9.

During the course of 2023, Cassa di Risparmio di Asti S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and of Italian Law 130/1999 on securitisation, finalised a non-recourse transfer of a portfolio of bad loans to the special purpose vehicle Luzzatti POP NPLs 2023 S.r.l., with registered office in Milan, Corso Vittorio Emanuele II, 24/28, entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 48509.4.

During the course of 2024, Cassa di Risparmio di Asti S.p.A., pursuant to Article 58 of Italian Legislative Decree 385/1993 and of Italian Law 130/1999 on securitisation, finalised a non-recourse transfer of a portfolio of bad loans to the special purpose vehicle Luzzatti POP NPLs 2024 S.r.l., with registered office in Milan, Corso Vittorio Emanuele II, 24/28, entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 48612.6.

The company Pitagora Finanziamenti Contro Cessione del Quinto S.p.A. has carried out nine securitisation transactions on salary/pension-backed loans.

The first transaction (closed during 2021) was concluded with the special purpose vehicle Madeleine SPV S.r.l., with registered office in Conegliano Veneto (TV), via Vittorio Alfieri 1, registered in the Treviso-Belluno Register of Companies at no.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

04559650264, registered in the List of special purpose securitisation vehicles established at the Bank of Italy at no. 35070.2.

The second transaction (closed in February 2017) was concluded with the special purpose vehicle Frida SPV S.r.l. with registered office in Milan, via Fara Gustavo no. 26, registered in the Milan Register of Companies at no. 08566680966, registered in the List of special purpose securitisation vehicles established at the Bank of Italy at no. 35147.8.

The third transaction (closed in November 2019) was concluded with the special purpose vehicle Annette S.r.l., with registered office in Milan, via A. Pestalozza 12/14, registered in the Milan Register of Companies at no. 09262480966, registered in the List of special purpose vehicles established at the Bank of Italy at no. 35232.8.

The fourth transaction was concluded with the special purpose vehicle Lake Securitisation S.r.l., with registered office in Conegliano Veneto (TV), via Vittorio Alfieri 1, registered in the Treviso-Belluno Register of Companies at no. 04830970267, registered in the List of special purpose securitisation vehicles established at the Bank of Italy at no. 35297.1, which was later taken over by Dyret SPV S.r.l., with registered office in Milan, via Fara Gustavo no. 26, registered in the Milan Register of Companies at no. 08575290963 and registered in the List of special purpose securitisation vehicles established at the Bank of Italy at no. 35125.4.

The fifth transaction was concluded with the special purpose vehicle Manu SPV S.r.l., with registered office in Conegliano Veneto (TV), via Vittorio Alfieri 1, 31015, registered in the Treviso-Belluno Register of Companies at no. 04909010268, registered in the List of special purpose vehicles established at the Bank of Italy at no. 35438.1.

The sixth transaction (closed in October 2019) was concluded with the special purpose vehicle Geordie SPV S.r.l., with registered office in Conegliano Veneto (TV), via Vittorio Alfieri 1, 31015, registered in the Treviso-Belluno Register of Companies at no. 04956000261, registered in the List of special purpose vehicles established at the Bank of Italy at no. 35476.1.

The seventh transaction was concluded with the special purpose vehicle Petilia Finance S.r.l., with registered office in Milan (MI), via Vittoria Betteloni 2, 20131, registered in the Milan Monza Brianza Lodi Register of Companies at no. 11024420967, registered in the List of special purpose vehicles established at the Bank of Italy at no. 35671.7.

The eighth transaction was concluded with the special purpose vehicle Giorgia SPV S.r.l., with registered office in Conegliano Veneto (TV), via Vittorio Alfieri 1, 31015, registered in the Treviso-Belluno Register of Companies at no. 05336020267, registered in the List of special purpose vehicles established at the Bank of Italy at no. 35929.9.

The ninth transaction was concluded with the special purpose vehicle AIDA SPV S.r.l., with registered office in Conegliano Veneto (TV), via Vittorio Alfieri 1, 31015, registered in the Treviso-Belluno Register of Companies at no. 05356240266, registered in the List of special purpose vehicles established at the Bank of Italy at no. 35985.1.


1.1 CREDIT RISK

As part of the transactions described above, the Company performs servicing activities on the loans transferred to the SPVs and sub-servicers for the Dyret SPV S.r.l. transaction, collecting on their behalf the loan repayment instalments, managing past-due recovery activities and requests for compensation from Insurance Companies following loss events. The collections received on the transferred loans are transferred daily to the SPVs, in their respective current accounts.

Details of the Group's outstanding transactions are provided below.

INFORMATION RELATING TO THE THIRD MULTI-ORIGINATOR SECURITISATION TRANSACTION

In June 2019, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. carried out the third multi-originator securitisation transaction with the special purpose vehicle Asti Group RMBS II S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 152897710 and entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 35584.2. The transaction took place through the non-recourse transfer to the SPV of residential mortgage loans, fixed, variable and option, for a total of € 988,009 thousand (of which € 862,439 thousand of Cassa di Risparmio di Asti S.p.A. and € 125,570 thousand of Biverbanca S.p.A.), all belonging to the “performing” category. The loans were transferred at their carrying amount. Against the loans transferred, notes totalling € 988,008 thousand were issued, repurchased in full by the originators Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. Ownership of the notes was obtained on 28/06/2019 through offsetting with the transferred loans. On the notes issued by the SPV, the established repayment plan has been determined on the basis of the amortisation of the transferred loans and the conditions set forth in the Offering Circular.

The ninth securitisation was originally a “self-securitisation” transaction: the relative notes, issued and not sold to institutional investors, but directly repurchased by the multi-originator Banks, were initially used as collateral in refinancing transactions with the European Central Bank, providing the Banks with a liquidity reserve available for short-term ordinary operations and to handle temporary unexpected financial needs, which could arise from cash flow imbalances or the situation in the financial markets. In the course of 2019, the senior class was sold to institutional investors.

The general aim of the securitisation transactions is to diversify the sources of funds and/or funding pools.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

Type of Note	Rating as at 31/12/2024 Moody's/D BRS	Rate	Date of issue	Expected maturity date	Total issue value	Total amount repaid as at 31/12/2024	Total residual value as at 31/12/2024	Notes repurchased and owned by Banca di Asti as at 31/12/2024 (nominal value)
Class A	Aa3/AAA	3M Euribor + 0.90% (*)	28/6/2019	29/12/2072	825,000	574,945	250,055	0
Class B	no rating/AA	3M Euribor + 2.00% (**)	28/6/2019	29/12/2072	64,300	0	64,300	64,300
Class C	no rating	3M Euribor + 3.00%	28/6/2019	29/12/2072	98,708	0	98,708	98,708
Total					988,008	574,945	413,063	163,008

Like in the other transactions, also in the ninth securitisation, a loan with limited enforceability was disbursed for € 17,850 thousand (€ 15,581 thousand by Cassa di Risparmio di Asti S.p.A. and € 2,269 thousand by Biverbanca S.p.A.), crediting the amount of € 17,806 thousand to the SPV for the cash reserve, broken down as follows: € 15,538 thousand for Banca di Asti and € 2,269 thousand for Biverbanca, and € 50 thousand for the provision for operating expenses, broken down as follows: € 44 thousand for Banca di Asti and € 6 thousand for Biverbanca.

The full repayment of the cash reserve and the provision for expenses will take place based on available financial resources at the time of full repayment of the notes.

The prospectus calls for a gradual reduction in the amount of the cash reserve: at each interest payment date, it will be reduced by the larger amount of 2% of the residual debt of the rated note and € 8,893 thousand; when at the interest payment date the Class A note will have been repaid in full, the cash reserve will be reduced to zero.

For this securitisation transaction, there is no rate hedging through swap transactions.

The SPV determines the excess spread on a quarterly basis, which is equal to the algebraic sum of interest income relating to loans collected during the period less, in order of priority, tax charges, vehicle management costs and interest expense relating to the bond loans paid during the same period.

The excess spread (additional remuneration on B class notes) will be paid in full by the SPV to the originators, based on available financial resources, when the notes are repaid; as at 31/12/2024 it amounted to € 43,252 thousand for Cassa di Risparmio di Asti S.p.A.

As at 31/12/2024, the Bank essentially retains the credit risk connected to the securitised loans, which the Bank continues to value by recognising in dedicated provisions the estimated loss in value, aside from the counterparty risk relating to the cash reserves and the provision for expenses disbursed to the vehicle and the excess spread to be collected.

The securitised loan assets were recognised in these financial statements under the item "Loans and advances to customers" in the amount of € 488,085 thousand.



1.1 CREDIT RISK

The financial liabilities for securitised loans are recognised in “Deposits from customers” in an equal amount.

The securitisation income and expenses recognised in these financial statements are as follows:

Income		Expenses	
interest income generated by securitised assets	22,862	interest expense on notes issued	20,520
bank interest income	901	servicing fee expense	516
		other interest expense	251
		losses on loans	133
		other expenses	200
Total	23,763	Total	21,620

The valuation of the securitised loans at their estimated realisable value entailed the recognition of € 11,545 thousand in overall value adjustments on the principal.

Interest income on repurchased notes, amounting to € 9,682 thousand, was fully allocated against a reduction in interest expense on the notes issued.

INFORMATION RELATING TO THE TENTH SECURITISATION TRANSACTION

In December 2021, Cassa di Risparmio di Asti S.p.A. carried out the tenth securitisation transaction with the special purpose vehicle Asti Group RMBS III S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 16326891005 and entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 35845.7. The transaction took place through the non-recourse transfer to the SPV of residential mortgage loans, fixed, variable and option, all secured by mortgage, for a total of € 611,784 thousand, all belonging to the “performing” category. The Bank has sold a first portfolio of initial residential loans (“Initial Loans”) and subsequently during the ramp-up period, the duration of which is established at 24 months from the date of issue of the Notes, the Bank will be able to sell portfolios of subsequent residential loans (“Subsequent Loans”).

Against the loans transferred (“initial receivables”), notes totalling € 611,784 thousand (initial first payment) were issued, repurchased in full by Cassa di Risparmio di Asti S.p.A. Ownership of the notes was obtained on 02/12/2021 through offsetting with the transferred loans. On the notes issued by the SPV, the established repayment plan has been determined on the basis of the amortisation of the transferred loans and the conditions set forth in the Offering Circular.

The tenth securitisation was a “self-securitisation” transaction: the related notes, issued and not transferred to institutional investors, but directly repurchased by the Bank, may subsequently be subject to sale or repurchase agreements with third parties (including the refinancing operations of the ECB), without prejudice to the “risk retention” obligations which C.R.Asti will have to fulfil. The SPV has issued two classes of ordinary Senior Notes, class A1 and class A2; finally, it issued the junior class notes. Both the Class A2 Notes and the Class J Notes have a partly-paid



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

structure. This means that, on the date of issue, the Class A2 Notes and the Class J Notes will be issued for their full nominal amount, with a first minimum initial payment by the subscriber. During the ramp-up period, the relevant subscribers will be able to make incremental payments (Further Instalments) in order to provide the SPV with the necessary funding for the payment of the purchase price of the Subsequent Loans that was in excess of the average tempore principal collections obtained by the SPV in relation to the Loans that would otherwise be used for the amortisation of the Class A2 Notes and the Class J Notes.

The general aim of the securitisation transactions is to diversify the sources of funds and/or funding pools.

Type of Note	Rating as at 31/12/2024 Moody's/DBRS	Rate	Date of issue	Expected maturity date	Total issue value	Total amount repaid as at 31/12/2024	Total residual value as at 31/12/2024	Notes repurchased and owned by the Bank as at 31/12/2024 (nominal value)
Class A	Aa3/AAA	3M Euribor + 0.70% (***)	02/12/2021	29/12/2082	523,100	188,253	334,847	0
Class A2	Aa3/AAA	3M Euribor + 0.70% (***)	02/12/2021	29/12/2082	759,500	457,898	301,602	301,602
Class J	no rating	Fixed 3%	02/12/2021	29/12/2082	217,400	60,386	157,014	157,014
Total					1,500,000	706,537	793,463	458,616

Similarly to the other transactions, also in the tenth securitisation, a contract for a loan with limited enforceability of a maximum amount of € 19,239 thousand was entered into. At the issue date of the securities, an amount of € 7,848 thousand for cash reserve and € 50 thousand for the provision for operating expenses was disbursed.

The full repayment of the cash reserve and the provision for expenses will take place based on available financial resources at the time of full repayment of the notes.

The aforementioned amount set up as a reserve will be reduced/used and replenished until its subsequent zeroing at the time of full redemption of the Senior Notes, according to the financial mechanisms indicated in the contracts:

- during the Ramp-up period it is calculated at each interest payment date (IPD) to the extent of 1.50% of the residual debt of the rated Notes;
- at the end of this period, at each IPD it is reduced by an amount equal to the greater of 1.50% of the amount of the outstanding residual debt of the rated Notes at that date and the product of (a) 0.75% and (b) the aggregate of residual debt of the Class A1 Notes at the Issue Date and the highest residual debt reached by the Class A2 Notes during the Ramp-up. When, on the interest payment date, the Class A note will have been repaid in full, the cash reserve will be reduced to zero.

For this securitisation transaction, there is no rate hedging through swap transactions.

The SPV determines the excess spread on a quarterly basis, which is equal to the algebraic sum of interest income relating to loans collected during the period less, in



1.1 CREDIT RISK

order of priority, tax charges, vehicle management costs and interest expense relating to the bond loans paid during the same period.

The excess spread (additional remuneration on J class notes) will be paid in full by the SPV to the originators, based on available financial resources, when the notes are repaid; as at 31/12/2024 it amounted to € 14,080 thousand for Cassa di Risparmio di Asti S.p.A.

As at 31/12/2024, the Bank essentially retains the credit risk connected to the securitised loans, which the Bank continues to value by recognising in dedicated provisions the estimated loss in value, aside from the counterparty risk relating to the cash reserves and the provision for expenses disbursed to the vehicle and the excess spread to be collected.

The securitised loan assets were recognised in these financial statements under the item “Loans and advances to customers” in the amount of € 795,486 thousand.

The financial liabilities for securitised loans are recognised in “Deposits from customers” in an equal amount.

The securitisation income and expenses recognised in these financial statements are as follows:

Income		Expenses	
interest income generated by securitised assets	31,816	interest expense on notes issued	29,415
bank interest income	1,182	servicing fee expense	847
		other interest expense	128
		losses on loans	236
		other expenses	182
Total	32,998	Total	30,808

The valuation of the securitised loans at their estimated realisable value entailed the recognition of € 9,895 thousand in overall value adjustments on the principal.

Interest income on repurchased notes, amounting to € 16,744 thousand, was fully allocated against a reduction in interest expense on the notes issued.

INFORMATION RELATING TO THE MILONE SECURITISATION TRANSACTION

In October 2023, Cassa di Risparmio di Asti S.p.A. carried out a new securitisation transaction with the special purpose vehicle Milone CQS S.r.l., with registered office in Conegliano, Via Alfieri n. 1, registered in the Rome Register of Companies no. 05430850262 and entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 48482.4. The transaction took place through the non-recourse transfer to the SPV of receivables from salary/pension-backed loans, or backed by a delegation of payment, totalling € 458,003, thousand all belonging to the “performing” category. The transaction provides for a revolving period of 12 months.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

The transaction provides for a revolving period of 12 months and has characteristics such as to be qualified as a simple, transparent and standardised securitisation pursuant to Articles 18 et seq. of EU Regulation 2017/2402 of the European Parliament.

Against the loans transferred ("initial receivables"), notes were issued for € 458,004 thousand (first initial payment). The notes were issued on 26 October 2023 and the established repayment plan has been determined on the basis of the amortisation of the transferred loans and the conditions set forth in the Offering Circular.

The general aim of the securitisation transactions is to diversify the sources of funds and/or funding pools.

Type of Note	Rating as at 31/12/2024 Moody's/DBRS	Rate	Date of issue	Expected maturity date	Total issue value	Total amount repaid as at 31/12/2024	Total residual value as at 31/12/2024	Notes repurchased and owned by Banca di Asti as at 31/12/2024 (nominal value)
Class A1	no rating	3M Euribor + 1.20%	26/10/2023	27/01/2049	368,600	0	368,600	0
Class J	no rating	Fixed 3%	26/10/2023	27/01/2049	89,404	0	89,404	89,404
Total					458,004	0	458,004	89,404

In order to protect the bond holders from possible losses and to ensure the soundness of the structure, enabling the SPV to meet its commitments to investors, the Bank granted the SPV a loan with limited collectability. The disbursement will take place in several instalments: € 50 thousand by the issue date and thereafter, as long as there are Class A Securities, an amount equal to the difference, if positive, between the Euribor Cash Reserve Target Amount and the account balance of the amounts deposited on the Euribor Cash Reserve Account.

For this securitisation transaction, there is no rate hedging through swap transactions.

The SPV determines the excess spread on a quarterly basis, which is equal to the algebraic sum of interest income relating to loans collected during the period less, in order of priority, tax charges, vehicle management costs and interest expense relating to the bond loans paid during the same period.

The excess spread (additional remuneration on J class notes) will be paid in full by the SPV to the originators, based on available financial resources, when the notes are repaid; as at 31/12/2024 it amounted to € 34,388 thousand for Cassa di Risparmio di Asti S.p.A.

As at 31/12/2024, the Bank essentially retains the credit risk connected to the securitised loans, which the Bank continues to value by recognising in dedicated provisions the estimated loss in value, aside from the counterparty risk relating to the cash reserves and the provision for expenses disbursed to the vehicle and the excess spread to be collected.



1.1 CREDIT RISK

The securitised loan assets were recognised in these financial statements under the item “Loans and advances to customers” in the amount of € 439,549 thousand.

The financial liabilities for securitised loans are recognised in “Deposits from customers” in an equal amount.

The securitisation income and expenses recognised in these financial statements are as follows:

Income		Expenses	
interest income generated by securitised assets	46,888	interest expense on notes issued	21,091
bank interest income	1,225	servicing fee expense	193
		losses on loans	169
		other interest expense	1
		other expenses	154
Total	48,113	Total	21,608

The valuation of the securitised loans at their estimated realisable value entailed the recognition of € 4,068 thousand in overall value adjustments on the principal.

Interest income on repurchased notes, amounting to € 2,727 thousand, was fully allocated against a reduction in interest expense on the notes issued.

INFORMATION RELATING TO THE ELEVENTH SECURITISATION TRANSACTION

In September 2024, Cassa di Risparmio di Asti S.p.A. carried out a multioriginator securitisation transaction with the special purpose vehicle Asti Group RMBS IV S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the Rome Register of Companies no. 17676691003 and entered in the List of special purpose securitisation vehicles established at the Bank of Italy pursuant to Article 4 of the Measure issued on 29/04/2011 at no. 48584.7. The transaction took place through the non-recourse transfer to the SPV of residential mortgage loans, fixed, variable and option, all secured by mortgage, for a total of € 988,009 thousand, all belonging to the “performing” category. The loans were transferred at their carrying amount.

The general aim of the securitisation transactions is to diversify the sources of funds and/or funding pools.

Like in the other transactions, also in the eleventh securitisation, a loan with limited enforceability will be disbursed, crediting to the SPV the amount for the cash reserve and for the provision for operating expenses.

Against the loans transferred, notes were issued for € 664,995 thousand. Ownership of the notes was obtained through offsetting against the transferred loans. On the notes issued by the SPV, the established repayment plan has been determined on the basis of the amortisation of the transferred loans and the conditions set forth in the Offering Circular. With settlement date of 15 November 2024, the Class A1 *senior* note was sold in full.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

The full repayment of the cash reserve and the provision for expenses will be subject to the available financial resources and in compliance with the payment order of priority.

Type of Note	Rating as at 31/12/2024 Moody's/DBRS	Rate	Date of issue	Expected maturity date	Total issue value	Total amount repaid as at 31/12/2024	Total residual value as at 31/12/2024	Notes repurchased and owned by Banca di Asti as at 31/12/2024 (nominal value)
Class A1	AAA/AAA/no.	3M Euribor + 0.96%	13/11/2024	27/12/2074	365,700	0	365,700	0
Class A2	AAA/AAA/Aa3	3M Euribor + 0.85%	13/11/2024	27/12/2074	186,100	15,524	170,576	170,576
Class J	no rating	Fixed 3%	13/11/2024	27/12/2074	113,195	0	113,195	113,195
Total					664,995	15,524	649,471	283,771

The SPV determines the excess spread on a quarterly basis, which is equal to the algebraic sum of interest income relating to loans collected during the period less, in order of priority, tax charges, vehicle management costs and interest expense relating to the bond loans paid during the same period.

The excess spread (additional remuneration on J class notes) will be paid in full by the SPV to the originator, based on available financial resources, when the notes are repaid; as at 31/12/2024 it amounted to € 7,207 thousand for Cassa di Risparmio di Asti S.p.A.

As at 31/12/2024, the Bank essentially retains the credit risk connected to the securitised loans, which the Bank continues to value by recognising in dedicated provisions the estimated loss in value, aside from the counterparty risk relating to the cash reserves and the provision for expenses disbursed to the vehicle and the excess spread to be collected. In order to guarantee bondholders regular coupon payments, indexed to parameters different from those of the mortgages, a derivative contract has been stipulated, with a maximum expiry date of 2054. The swap agreement was entered into with Unicredit Bank GmbH and mirrors the swap entered into by the SPV and Unicredit Bank GmbH.

The SPV pays a fixed rate to Unicredit Bank GmbH on a quarterly basis and receives the 3-month Euribor (against the swap stipulated); Unicredit Bank GmbH, in turn, pays the same fixed rate to the Bank and receives the 3-month Euribor.

The securitised loan assets were recognised in these financial statements under the item "Loans and advances to customers" in the amount of € 634,628 thousand. The financial liabilities for securitised loans are recognised in "Deposits from customers" in an equal amount.

The securitisation income and expenses recognised in these financial statements are as follows:



1.1 CREDIT RISK

Income		Expenses	
interest income generated by securitised assets	10,400	interest expense on notes issued	3,421
bank interest income	136	servicing fee expense	217
Other revenues	1,417	other interest expense	15
		other expenses	1,093
Total	11,953	Total	4,746

The valuation of the securitised loans at their estimated realisable value entailed the recognition of € 2,101 thousand in overall value adjustments on the principal.

Interest income on repurchased notes, amounting to € 1,521 thousand, was fully allocated against a reduction in interest expense on the notes issued.

The valuation of the derivative contract entered into by the SPV with Unicredit Bank GmbH resulted in the recognition of a capital loss of € 413 thousand in the Bank's income statement. The derivative contract entered into by the Bank and Unicredit Bank GmbH recorded a capital loss of € 729 thousand in the income statement, in addition to interest income of € 383 thousand.

INFORMATION RELATING TO THE MAGGESE PROJECT TRANSACTION

On 16 July 2018, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. finalised, pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle Maggese S.r.l., with registered office in Rome, Via Curtatone no. 3, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 07/06/2017, in force as of 30 June 2017, at no. 35475.3.

In particular, 5,313 loans originated by Cassa di Risparmio di Asti S.p.A. and by Biverbanca S.p.A. were transferred to the SPV, with a gross book value of € 694,546 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 26 July 2018 Maggese S.r.l. issued the following classes of notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:

Type of Note	Rating as at 31/12/2024 Moody's/Scope/ DBRS	Rate	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by the Bank as at 31/12/2024
Class A	Caa1/CCC/CC	6M Euribor + 0.5%	26/7/2018	25/7/2037	170,809	0.571	73,276	97,533	97,533
Class B	no rating	6M Euribor + 6%	26/7/2018	25/7/2037	24,401	1.000	0	24,401	1,221
Class C	no rating	6M Euribor + 5%	26/7/2018	25/7/2037	11,420	1.000	0	11,420	572
Total					206,630		73,276	133,354	99,326



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

The structure benefits from a cash reserve equal to 4% of the class A notes (at the moment of the closing equal to € 6,832 thousand), which was repaid for an amount of € 2,880 thousand as at 31 December 2024. This reserve was funded by Cassa di Risparmio di Asti S.p.A. and by Biverbanca S.p.A. through a subordinated loan bearing interest at a fixed rate of 1%.

INFORMATION RELATING TO THE POP NPLS 2019 S.R.L. TRANSACTION

On 10 December 2019, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A., along with another ten banks (defined as “Transferors”) finalised, pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle POP NPLs 2019 S.r.l., with registered office in Conegliano (TV), Via Vittorio Alfieri no. 1, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35670.9.

In particular, a portfolio of credit positions originated by Cassa di Risparmio di Asti S.p.A. and by Biverbanca S.p.A. was transferred to the SPV, with a gross book value of € 62,490 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 23 December 2019 POP NPLs 2019 S.r.l. issued the following classes of notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:

Type of Note	Rating as at 31/12/2024 DBRS/Scope Ratings	Return	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	BBB/BB+	6M Euribor + 0.30%	23/12/2019	06/02/2045	173,000	0.426	99,230	73,770	7,249
Class B	CCC/CC	6M Euribor + 9.50%	23/12/2019	06/02/2045	25,000	1.000	0	25,000	123
Class J	no rating	6M Euribor + 12.00%	23/12/2019	06/02/2045	5,000	1.000	0	5,000	25
Total					203,000		99,230	103,770	7,397

The notes were subscribed in full by the Transferring Banks and, also on 23 December 2019, 94.61% of the nominal value of the Mezzanine Notes and 94.61% of the nominal value of the Junior Notes was transferred to JP Morgan Securities plc.

As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 “Loans and advances to customers”). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.



1.1 CREDIT RISK

As part of this transaction, on 16 December 2019, the SPV entered into two cap agreements with J.P. Morgan AG on rates to hedge interest rate risk relating to the notes.

The structure also benefits from a cash reserve equal to 4.70% of the total nominal value of the senior notes (€ 8,085 thousand), intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by the transferors. The residual amount of the cash reserve as at 31 December 2024 is € 447 thousand.

On 27 April 2020, the MEF released the state guarantee on liabilities issued (GACS) in favour of the holders of senior notes, obtained after submission of an application on 8 January 2020.

INFORMATION RELATING TO THE POP NPLS 2020 S.r.l. TRANSACTION

On 22 December 2020, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A., along with another thirteen banks (defined as “Transferors”) finalised, pursuant to Article 58 of Italian Legislative Decree 385/1993 and Article 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle POP NPLs 2020 S.r.l., with registered office in Rome, Via Piemonte no. 38, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35758.2.

In particular, a portfolio of credit positions originated by Cassa di Risparmio di Asti S.p.A. and by Biverbanca S.p.A. was transferred to the SPV, with a gross book value of € 113,182 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 23 December 2020 POP NPLs 2020 S.r.l. issued the following classes of notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:

Type of Note	Rating as at 31/12/2024 DBRS/Scope Ratings	Return	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	BBB/BBB+	6M Euribor + 0.30% (*)	23/12/2020	29/12/2045	241,500	0.345	158,212	83,288	7,973
Class B	CCC/CC	6M Euribor + 12%	23/12/2020	29/12/2045	25,000	1.000	0	25,000	154
Class J	no rating	Variable	23/12/2020	29/12/2045	10,000	1.000	0	10,000	62
Total					276,500		158,212	118,288	8,189

(*) Cap equal to the Euribor



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

The notes were subscribed in full by the Transferring Banks and, also on 23 December 2020, 94.6% of the nominal value of the Mezzanine Notes and 94.6% of the nominal value of the Junior Notes was transferred to JP Morgan Securities plc.

As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 “Loans and advances to customers”). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.

As part of this transaction, on 22 December 2020, the SPV entered into two cap agreements with J.P. Morgan AG on rates to hedge interest rate risk relating to the notes.

The structure also benefits from a cash reserve equal to 4.10% of the total nominal value of the senior notes (€ 9,910 thousand), intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by the transferors. The residual amount of the cash reserve as at 31 December 2024 is € 367 thousand.

On 25 January 2021, a petition was submitted to the MEF to obtain the “GACS” in favour of the holders of the senior note.

INFORMATION RELATING TO THE BCC NPLs 2021 S.R.L. TRANSACTION

On 16 November 2021, Cassa di Risparmio di Asti S.p.A., along with another seventy-four banks (defined as “Transferors”) finalised, pursuant to Article 58 of Italian Legislative Decree 385/1993 and Articles 1 and 4 of Italian Law 130/1999 on securitisation, a non-recourse transfer with consideration and en bloc of a portfolio of bad loans to the special purpose vehicle BCC NPLs 2021 S.r.l., with registered office in Conegliano (TV), Via Vittorio Alfieri 1, 31015 entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35852.3. In particular, a portfolio of credit positions was transferred to the SPV, originated by Cassa di Risparmio di Asti S.p.A., with a gross carrying amount of € 127,089 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 29 November 2021, BCC NPLs 2021 S.r.l. issued the following classes of notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:


1.1 CREDIT RISK

Type of Note	Rating as at 31/12/2024 Moody's/ Scope/ARC Ratings	Return	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	Baa2/BBB/BBB	6M Euribor + 0.35% (*)	29/11/2021	30/04/2046	284,000	0.590	116,360	167,640	16,325
Class B	Caa2/CCC/CCC+	6M Euribor + 8%	29/11/2021	30/04/2046	39,500	1.000	0	39,500	192
Class J	no rating	Fixed 10%	29/11/2021	30/04/2046	13,000	1.000	0	13,000	63
Total					336,500		116,360	220,140	16,580

(*) Cap equal to the Euribor

The senior notes were subscribed in full by the Transferring Banks and, also on 16 November 2021, 94.38% of the nominal value of the Mezzanine Notes and 94.38% of the nominal value of the Junior Notes was transferred to Bracebridge Capital LCC. As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 "Loans and advances to customers"). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.

The structure also benefits from a cash reserve equal to € 13,520 thousand, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed in part by the transferors, amounting to around € 750 thousand for Cassa di Risparmio di Asti S.p.A. On 10 June 2022, the "GACS" guarantee was obtained from the MEF in favour of the holders of the senior note.

INFORMATION RELATING TO THE BCC NPLS 2022 S.R.L. TRANSACTION

On 2 May 2022, Cassa di Risparmio di Asti S.p.A., along with a group of banks (defined as 'Transferors') finalised, pursuant to Italian Law 130 of 30 April 1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle BCC NPLs 2022 S.r.l., with registered office in Conegliano Veneto, Via Vittorio Alfieri no. 1, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35897.8.

In particular, a portfolio of credit positions originated by Cassa di Risparmio di Asti S.p.A. was transferred to the SPV, with a gross book value of € 24,595 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 10 May 2022 BCC NPLs 2022 S.r.l. issued the following classes of notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

Type of Note	Rating as at 31/12/2024 Moody's/ARC Ratings	Rate	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	Baa1/BBB	6M Euribor + 0.50%	10/05/2022	31/01/2047	142,000	0.784	30,725	111,275	3,871
Class B	no rating	6M Euribor + 9.5%	10/05/2022	31/01/2047	19,500	1.000	0	19,500	34
Class J	no rating	Fixed 15%	10/05/2022	31/01/2047	6,500	1.000	0	6,500	11
Total					168,000		30,725	137,275	3,916

The notes were subscribed in full by the Transferring Banks and, also on 10 May 2022, 94.22% of the nominal value of the Mezzanine Notes and 94.23% of the nominal value of the Junior Notes was transferred to Bayview Global Opportunities Fund. As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 "Loans and advances to customers"). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.

As part of the transaction, the SPV entered into two derivative contracts with third-party operators independent of the Transferring Banks to hedge the interest rate risk pertaining to the basic scope of the securities.

The structure also benefits from a cash reserve equal to € 4.6 million, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve as at 31 December 2024 is € 126 thousand.

On 10 June 2022, the 'GACS' guarantee was obtained from the MEF in favour of holders of the senior notes.

INFORMATION RELATING TO THE LUZZATTI POP NPLS 2022 S.R.L. TRANSACTION

On 29 December 2022, Cassa di Risparmio di Asti S.p.A., along with a group of another fourteen other banks (defined as 'Transferors') finalised, pursuant to Italian Law 130 of 30 April 1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle Luzzatti POP NPLs 2022 S.r.l., with registered office in Conegliano Veneto, Via Vittorio Alfieri no. 1, registered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 35986.9.

In particular, a portfolio of credit positions originated by Cassa di Risparmio di Asti S.p.A. was transferred to the SPV, with a gross book value of € 78,838 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 29 December 2022 POP NPLs 2022 S.r.l. issued the following classes of notes pursuant



1.1 CREDIT RISK

to and in accordance with Article 5 of Italian Law 130/1999:

Type of Note	Rating as at 31/12/2024 Moody's/ARC Ratings	Rate	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	Baa1/BBB+	Fixed 4%	29/12/2022	31/01/2042	118,250	0.602	47,008	71,242	11,884
Class B	no rating	6M Euribor + 10%	29/12/2022	31/01/2042	17,500	1.000	0	17,500	146
Class J	no rating	6M Euribor + 15%	29/12/2022	31/01/2042	3,000	1.000	0	3,000	25
Total					138,750		47,008	91,742	12,055

The notes were fully subscribed by the Transferring Banks and, also on 29 December 2022, 95% of the nominal value of the Mezzanine Notes and 95% of the nominal value of the Junior Notes were transferred to Intesa San Paolo S.p.A. for subsequent placement on the market. As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 "Loans and advances to customers"). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.

The structure also benefits from a cash reserve equal to € 5,320 million, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve as at 31 December 2024 is € 541 thousand.

As regards the GACS guarantee, the senior notes are eligible for this guarantee but on the basis of the Italian regulations in force at the date of the transaction, the guarantee cannot be requested.

INFORMATION RELATING TO THE LUZZATTI POP NPLS 2023 S.R.L. TRANSACTION

On 28 December 2023, Cassa di Risparmio di Asti S.p.A., along with a group of another fourteen other banks (defined as "Transferors") finalised, pursuant to Italian Law 130 of 30 April 1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle Luzzatti POP NPLs 2023 S.r.l., with registered office in Corso Vittorio Emanuele II, 24/28, Milan, entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 48509.4.

In particular, a portfolio of credit positions originated by Cassa di Risparmio di Asti S.p.A. was transferred to the SPV, with a gross book value of € 37,160 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 28 December 2023 Luzzatti POP NPLs 2023 S.r.l. has issued the following classes of



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:

Type of Note	Rating as at 31/12/2024 ARC/DBRS	Rate	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	BBB+/BBB	Fixed 4%	28/12/2023	30/06/2043	77,500	0.584	32,277	45,223	6,756
Class B	no rating	6M Euribor + 10%	28/12/2023	30/06/2043	11,000	1.000	0	11,000	82
Class J	no rating	6M Euribor + 15%	28/12/2023	30/06/2043	3,000	1.000	0	3,000	23
Total					91,500		32,277	59,223	6,861

The notes were fully subscribed by the Transferring Banks and, also on 29 December 2023, 95% of the nominal value of the Mezzanine Notes and 95% of the nominal value of the Junior Notes were transferred to Intesa San Paolo S.p.A. for subsequent placement on the market. As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 "Loans and advances to customers"). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.

The structure also benefits from a cash reserve equal to € 3,490 million, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve of the Bank as at 31 December 2024 is € 466 thousand.

As regards the GACS guarantee, the senior notes are eligible for this guarantee but on the basis of the Italian regulations in force at the date of the transaction, the guarantee cannot be requested.

INFORMATION RELATING TO THE LUZZATTI POP NPLS 2024 S.R.L. TRANSACTION

On 19 December 2024, Cassa di Risparmio di Asti S.p.A., along with a group of another seven other banks and a financial intermediary pursuant to Article 106 of the Consolidated Banking Law - TUB (defined as "Transferors") finalised, pursuant to Italian Law 130 of 30 April 1999 on securitisation, a non-recourse transfer for valuable consideration and en bloc of a portfolio of bad loans to the special purpose vehicle Luzzatti POP NPLs 2024 S.r.l., with registered office in Corso Vittorio Emanuele II, 24/28, Milan, enrolled in the Companies Register with no. 13808670965, entered in the List of special purpose vehicles managed by the Bank of Italy pursuant to the Measure of the Governor of the Bank of Italy of 7 June 2017, in force as of 30 June 2017, at no. 48612.6.



1.1 CREDIT RISK

In particular, a portfolio of credit positions originated by Cassa di Risparmio di Asti S.p.A. was transferred to the SPV, with a gross book value of € 26,404 thousand at the transfer date. Against the acquisition of the above-mentioned loans, on 19 December 2024 Luzzatti POP NPLs 2024 S.r.l. has issued the following classes of notes pursuant to and in accordance with Article 5 of Italian Law 130/1999:

Type of Note	Rating as at 31/12/2024 ARC/DBRS	Rate	Date of issue	Expected maturity date	Total amount issued	Pool Factor	Total amount repaid as at 31/12/2024	Total residual amount as at 31/12/2024	Residual amount of notes repurchased and still owned by Banca di Asti as at 31/12/2024
Class A	BBB(HIGH)/BBB+	Fixed 3.5%	19/12/2024	31/05/2045	47,850	1.000	0	47,850	8,562
Class B	no rating	6M Euribor + 10%	19/12/2024	31/05/2045	7,000	1.000	0	7,000	63
Class J	no rating	6M Euribor + 15%	19/12/2024	31/05/2045	1,500	1.000	0	1,500	13
Total					56,350		32,277	56,350	8,638

The notes were fully subscribed by the Transferring Banks and, also on 19 December 2024, 95% of the nominal value of the Mezzanine Notes and 95% of the nominal value of the Junior Notes were transferred to Intesa San Paolo S.p.A. for subsequent placement on the market. As the requirements were met for the derecognition of the NPLs pursuant to IFRS 9, the bad loans underlying the securitisation were derecognised from the assets of the Bank (asset item 40 “Loans and advances to customers”). The transaction thus structured indeed led to the transfer to third parties of all risks and benefits linked to the transferred loan portfolio.

The structure also benefits from a cash reserve equal to € 2,255 million, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve of the Bank as at 31 December 2024 is € 403 thousand.

As regards the GACS guarantee, the senior notes are eligible for this guarantee but on the basis of the Italian regulations in force at the date of the transaction, the guarantee cannot be requested.

INFORMATION RELATING TO THE DYRET SPV TRANSACTION

On 11 May 2017, the company entered into a new non-recourse monthly loan transfer agreement with the special purpose vehicle Lake Securitisation S.r.l., as part of a multi-originator securitisation transaction structured by Banca Progetto, pursuant to Italian Law 130, with no note tranching.

The aims of the transfer agreed with the lead investor envisaged a commitment of between € 50-100 million per year as the price, for a maximum 24 months.

The transfer agreement underlying the transaction calls for different transfer prices depending on product type.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

The company has no obligation to retain the notes issued by the vehicle established pursuant to Italian Law 130, considering the fact that the transaction cannot be considered a securitisation pursuant to Regulation (EU) no. 575/2013 of the European Parliament and of the Council of 26 June 2013, on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No. 648/2012 - Capital Requirements Regulation (CRR), since the requirements established therein are not met.

In June 2018, in agreement with the investors on the basis of contractual provisions, Pitagora suspended the transfer flows, having transferred a total of around € 50.7 million.

On 6 December 2018, pursuant to the combined provisions of Articles 1 and 4 of the Securitisation Law, Lake SPV transferred the securitised loans to Dyret SPV S.r.l., with Banca IMI as the Senior Notes investor and Golden Tree as the Junior Notes investor.

INFORMATION RELATING TO THE PETILIA SECURITISATION TRANSACTION

On 19 December 2019, the company entered into a new non-recourse monthly loan transfer agreement with the special purpose vehicle PETILIA SPV S.r.l., as part of a new securitisation transaction with derecognition pursuant to Italian Law 130, structured by Banca Popolare Puglia e Basilicata, with no notes tranching.

The total maximum value of the notes that may be issued is € 270 million, with a 24-month ramp-up period. The notes have a “partly paid” structure and were subscribed in full by Banca Popolare di Puglia e Basilicata.

The company has no obligation to retain the notes issued by the vehicle established pursuant to Italian Law 130, considering the fact that the transaction cannot be considered a securitisation pursuant to EU Regulation 575/2013 of the European Parliament and of the Council of 26 June 2013, on prudential requirements for credit institutions and investment firms and amending EU Regulation 648/2012 - Capital Requirements Regulation (CRR), since the requirements established therein are not met.

The transaction refers to the assignment of performing CQS/CQP exposures (consumer credit segment).

The transfers of loans were carried out by paying a purchase price according to a transfer rate differentiated by product type. The purchase price is above par.

Overall, during 2021 loans amounting to a total € 66,168,837 in principal terms were transferred.

In December 2021, a restructuring of the transaction was agreed with the investor aimed at extending the ramp-up period until December 2023.

In June 2022, a restructuring of the transaction was agreed with the investor in order to replace the senior single note with 2 different classes of Senior and Junior Notes which, at the issue date, were fully subscribed by Banca Popolare di Puglia and Basilicata:



1.1 CREDIT RISK

- size of the new 'Senior Notes' at € 243,000,000.00 with an interest rate of '0.30% + Euribor 1M';
- size of the new 'Junior Notes' at € 27,000,000.00 with an interest rate of '6.00% + Euribor 1M'.

In August 2022, a further contractual amendment was signed in order to:

- change the interest rate of the Senior Notes to "0.70% + Euribor 1M" and repay at each IPD only 80% of the value of the interest of the Junior Notes accrued and not yet paid.

Pitagora, in addition to being Originator, took on the Servicer role of managing the collection and recovery of loans transferred in the name and on behalf of the SPV. This activity enables Pitagora to maintain direct relations with its customers, transferring principal and interest collections to accounts opened in the name of Petilia SPV S.r.l. at the collection custodian bank.

INFORMATION RELATING TO THE GIORGIA SECURITISATION TRANSACTION

On 22 July 2022, the company entered into a non-recourse monthly loan transfer agreement with the special purpose vehicle GIORGIA SPV S.r.l., as part of a new securitisation transaction with de-recognition pursuant to Italian Law 130, structured by Banca Popolare di Bari, with no notes tranching.

The total maximum value of the notes that may be issued is € 320 million, with a 5-year Ramp-up period, i.e. until 27 December 2027. The notes have a "partly paid" structure and were subscribed in full by Banca Popolare di Bari.

The company has no obligation to retain the notes issued by the vehicle established pursuant to Italian Law 130, considering the fact that the transaction cannot be considered a securitisation pursuant to EU Regulation 575/2013 of the European Parliament and of the Council of 26 June 2013, on prudential requirements for credit institutions and investment firms and amending EU Regulation 648/2012 - Capital Requirements Regulation (CRR), since the requirements established therein are not met.

The transaction refers to the assignment of performing CQS/CQP exposures (consumer credit segment).

The transfers of loans were carried out by paying a purchase price according to a transfer rate differentiated by product type. The purchase price is above par.

Following the assignments occurred in 2022, the value of the security amounted to € 101,465,454.25.

No loans were transferred in 2024, and at the "payment date" of 27/12/2024, the outstanding value of the only note present was € 71,268,880.57.

Pitagora, in addition to being Originator, took on the Servicer role of managing the collection and recovery of loans transferred in the name and on behalf of the SPV. This activity enables Pitagora to maintain direct relations with its customers, transferring principal and interest collections to accounts opened in the name of GIORGIA SPV S.r.l. at the collection custodian bank.



INFORMATION RELATING TO THE AIDA SECURITISATION

On 7 December 2022, the company entered into a non-recourse monthly loan transfer agreement with the special purpose vehicle AIDA SPV S.r.l., as part of a securitisation transaction without derecognition, for a total maximum value of € 320 million of nominal value of the notes, with a 2-year Ramp-up period, until 27 February 2024.

The transaction refers to the assignment of performing CQS/CQP/DEL/TFS exposures (consumer credit segment). The loans were transferred at par.

Overall during 2022, loans amounting to a total € 115,055,462.59 in principal terms were transferred.

To finance the acquisition of the loans transferred by Pitagora, the SPV issued “asset backed” (partially paid) notes broken down into two classes:

- 82.06% 'Senior' Notes (Class A Asset Backed) for a nominal value of € 260,000,000.00;
- 17.94% 'Junior' Notes (Class J Asset Backed) for a nominal value of € 60,000,000.00.

At the issue date, the Senior notes were entirely subscribed by Banca Popolare di Bari, while the Junior notes were entirely subscribed by the company.

The transaction involved a single transfer in 2022 and, as at 31 December 2022, the value of the securities was as follows:

- “Senior” Notes (Class A Asset Backed): € 94,471,666.29
- “Junior” Notes (Class J Asset Backed): € 21,799,790.92

The Senior Notes of the transaction provide a variable return to the investor of € 1 million to which a fixed spread of 1.25% is added. The Junior Notes receive any transaction excess spread.

Pitagora, in addition to being Originator, took on the Servicer role of managing the collection and recovery of loans transferred in the name and on behalf of the SPV. This activity enables Pitagora to maintain direct relations with its customers, transferring principal and interest collections to accounts opened in the name of AIDA SPV S.r.l. at the collection custodian bank.

No receivables were sold in 2024, and on the “payment date” of 27/12/2024 the outstanding value of the securities was as follows:

- Senior Notes: € 57,343,583.37
- Junior Notes: € 21,799,790.92

In February 2024, the ramp-up period of the transaction ended, therefore, no more incremental transfers are planned.

Quality of underlying assets/Exposures	Balance sheet exposures					
	Senior		Mezzanine		Junior	
	Book value	Value adjustments	Book value	Value adjustments	Book value	Value adjustments
A. Fully derecognised	27,646	57	227	0	0	0
securities connected to the Luzzatti NPLs 2024 securitisation transaction	8,787	0	2	0	0	0
securities connected to the Luzzatti NPLs 2023 securitisation transaction	6,785	45	47	0	0	0
securities connected to the Luzzatti NPLs 2022 securitisation transaction	12,074	12	27	0	0	0
securities connected to the Maggese securitisation transaction	0	0	39	0	0	0
securities connected to the Pop NPLs 2019 securitisation transaction	0	0	20	0	0	0
securities connected to the Pop NPLs 2020 securitisation transaction	0	0	26	0	0	0
securities connected to the Pop NPLs 2021 securitisation transaction	0	0	57	0	0	0
securities connected to the Pop NPLs 2022 securitisation transaction	0	0	9	0	0	0
B. Partially derecognised	0	0	0	0	0	0
- Type of activity	0	0	0	0	0	0
C. Not derecognised	2,626,436	28,907	30,408	391	60,199	621
performing mortgage loans	2,402,481	12,719	0	0	0	0
<i>non-performing mortgage loans</i>	34,314	14,889	0	0	0	0
salary/pension-backed loans	751,279	5,367	30,408	391	60,199	621

(Continued)

[illegible]



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

C.2 Exposures arising from major "third party" securitisation transactions broken down by type of securitised assets and exposures

Type of securitised assets/Exposures	Balance sheet exposures					
	Senior		Mezzanine		Junior	
	Book value	Net value adjustments/recoveries	Book value	Net value adjustments/recoveries	Book value	Net value adjustments/recoveries
Securities representing loans disbursed by Credimi	5,132	407	0	0	0	0

(continued)

Guarantees given						Credit facilities					
Senior		Mezzanine		Junior		Senior		Mezzanine		Junior	
Net exposure	Net value adjustments/recoveries	Net exposure	Net value adjustments/recoveries	Net exposure	Net value adjustments/recoveries	Net exposure	Net value adjustments/recoveries	Net exposure	Net value adjustments/recoveries	Net exposure	Net value adjustments/recoveries
0	0	0	0	0	0	0	0	0	0	0	0

C.3 Prudential consolidation - Stakes in special purpose securitisation vehicles

Securitisation name/Special purpose vehicle name	Registered Office	Consolidation	Assets			Liabilities		
			Loans	Debt securities	Other	Senior	Mezzanine	Junior
Asti GROUP PMI S.r.l.	Rome	Yes	1,081,891	120,000	58,786	700,000	0	485,339
Asti GROUP RMBS II S.r.l.	Rome	Yes	484,343	0	20,766	250,054	64,300	98,708
Asti GROUP RMBS III S.r.l. (*)	Rome	Yes	793,395	0	25,380	319,639	301,602	157,014
Asti GROUP RMBS IV S.r.l.	Rome	Yes	633,737	0	22,152	352,998	170,576	113,195
Milone S.r.l.	Milan	Yes	439,549	0	59,418	368,600	0	89,404
Maggese S.r.l.	Rome	No	90,798	0	12,008	97,533	30,726	11,495
POP NPLs 2019 S.r.l.	Conegliano (TV)	No	3,980	0	0	5,441	1,844	369
POP NPLs 2020 S.r.l.	Rome	No	12,210	0	3,032	10,240	3,074	1,229
BCC NPLs 2021 S.r.l.	Conegliano (TV)	No	16,692	0	0	16,261	1,304	109
BCC NPLs 2022 S.r.l.	Conegliano (TV)	No	3,787	0	0	4,251	158	0
Luzzatti POP NPLs 2022	Conegliano (TV)	No	66,962	0	0	10,302	2,531	434
Luzzatti POP NPLs 2023	Milan	No	10,599	0	0	5,363	1,305	356
Luzzatti POP NPLs 2024	Milan	No	5,252,740	0	0	6,359	679	146
MANU SPV SRL	Conegliano (TV)	Yes	215,231	0	10,556	162,950	27,962	31,477
DYRET SPV SRL	Milan	No	35,410	0	1,588	17,592	13,667	21,360
PETILIA FINANCE SRL	Milan	No	73,125	0	5,283	77,992	22,639	0
GIORGIA SPV SRL	Conegliano (TV)	No	75,236	0	1,708	71,269	0	0
AIDA SPV SRL	Conegliano (TV)	Yes	76,859	0	2,555	57,344	0	21,800

The item "Liabilities" includes the notes issued.

(*) Self-securitisation transaction.



1.1 CREDIT RISK

C.4 Prudential consolidation - Non-consolidated special purpose securitisation vehicles

Maggese S.r.l.

Following the securitisation of bad loans to the special purpose vehicle Maggese S.r.l., Cassa di Risparmio di Asti S.p.A. holds the entire senior tranche issued by the SPV, backed by the Italian State GACS guarantee, with a total value of € 97,533 thousand as at 31 December 2024.

The details of the senior tranche are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 Moody's/Scope/DBRS	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	6M Euribor + 0.5%	Caa1/CCC/CC	July 2037	170,809	97,533	Cassa di Risparmio di Asti S.p.A.
Total					170,809	97,533	

At the issue date, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. disbursed, for € 5,589 thousand and € 1,243 thousand, respectively, a limited recourse loan in favour of the SPV for a total of € 6,832 thousand (corresponding to the target cash reset amount at the issue date). This loan was disbursed to allow for the constitution of the required cash reserve. As of the disbursement date interest will accrue on the amount of the loan, or the lower principal sum still due over time following the partial repayments, at an annual rate of 1% calculated on an ACT/360 basis.

POP NPLs 2019 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle POP NPLs 2019 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 173,000 thousand and for which the Ministry of Economy and Finance on 27 April 2020 granted admission to the state guarantee scheme on the issued liabilities (GACS).

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 Moody's/Scope/DBRS	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	6M Euribor + 0.30%	BBB/BB	February 2045	173,000	7,249	Cassa di Risparmio di Asti S.p.A.
Total					173,000	7,249	

The structure also benefits from a cash reserve equal to 4.70% of the total nominal value of the senior notes (€ 8,085 thousand), intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

the transferors. The residual amount of the cash reserve as at 31 December 2024 is € 351 thousand.

POP NPLs 2020 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle POP NPLs 2020 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 241,500 thousand and for which a request for the guarantee (GACS) was obtained by the Ministry of Economy and Finance on 25 January 2021.

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 DBRS/Scope Ratings	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	6M Euribor + 0.30%	BBB/BBB	December 2045	241,500	7,973	Cassa di Risparmio di Asti S.p.A.
Total					241,500	7,973	

The structure also benefits from a cash reserve equal to 4.10% of the total nominal value of the senior notes (€ 9,910 thousand), intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by the transferors. The residual amount of the cash reserve as at 31 December 2024 is € 367 thousand.

BCC NPLs 2021 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle BCC NPLs 2021 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 284,000 thousand as at 31 December 2021 and for which the Ministry of Economy and Finance on 10 June 2022 granted admission to the state guarantee scheme (GACS).

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 Moody's/Scope Ratings	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	6M Euribor + 0.35%	Baa2/BBB	April 2046	284,000	16,325	Cassa di Risparmio di Asti S.p.A.
Total					284,000	16,325	

The structure also benefits from a cash reserve equal to 11.10% of the total nominal value of the senior notes (€ 31,520 thousand), intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by



1.1 CREDIT RISK

the transferors, amounting to around € 750 thousand for Cassa di Risparmio di Asti S.p.A.

The residual amount of the cash reserve as at 31 December 2024 is € 665 thousand.

BCC NPLs 2022 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle BCC NPLs 2022 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 284,000 thousand as at 31 December 2022 and for which the GACS guarantee was received by Ministry of Economy and Finance on 10 June 2022.

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 Moody's/Scope Ratings	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	6M Euribor + 0.50%	Baa1/BBB	January 2047	142,000	3,871	Cassa di Risparmio di Asti S.p.A.
Total					142,000	3,871	

The structure also benefits from a cash reserve equal to € 4.6 million, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve as at 31 December 2024 is € 126 thousand.

Luzzatti POP NPLs 2022 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle Luzzatti POP NPLs 2022 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 284,000 thousand as at 31 December 2022 and for which pursuant to Italian legislation, the GACS guarantee cannot be requested at the date of completion. However, the notes are payable under the GACS guarantee.

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 Moody's/Scope Ratings	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	Fixed 4%	Baa1/BBB+	January 2042	118,250	11,884	Cassa di Risparmio di Asti S.p.A.
Total					118,250	11,884	

The structure also benefits from a cash reserve equal to € 4,736 million, equal to 4% of the senior notes, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve as at 31 December 2024 is € 541 thousand.

Luzzatti POP NPLs 2023 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle Luzzatti POP NPLs 2023 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 77,500 thousand as at 31 December 2023 and for which pursuant to Italian legislation, the GACS guarantee cannot be requested at the date of completion. However, the notes are eligible for the GACS guarantee.

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 ARC/DBRS	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	Fixed 4%	BBB(HIGH)/BBB+	June 2043	77,500	6,756	Cassa di Risparmio di Asti S.p.A.
Total					77,500	6,756	

The structure also benefits from a cash reserve equal to € 4,736 million, equal to 4% of the senior notes, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve as at 31 December 2024 is € 466 thousand.

Luzzatti POP NPLs 2024 S.r.l.

Following the securitisation of bad loans to the special purpose vehicle Luzzatti POP NPLs 2024 S.r.l., the Transferring Banks subscribed pro rata the senior tranche issued by the SPV, for a total value of € 47,850 thousand as at 31 December 2024 and for which pursuant to Italian legislation, the GACS guarantee cannot be requested at the date of completion. However, the notes are eligible for the GACS guarantee.

The details of the senior tranche held by Cassa di Risparmio di Asti S.p.A. are provided below:

Note	Listing Market	Rate/Spread	Rating as at 31/12/2024 ARC/DBRS	Final repayment date	Nominal value issued	Residual amount of notes repurchased and still owned as at 31/12/2024	Subscriber
Senior	Unlisted	Fixed 3.5%	BBB(HIGH)/BBB+	May 2045	47,850	8,562	Cassa di Risparmio di Asti S.p.A.
Total					47,850	8,562	

The structure also benefits from a cash reserve equal to € 2,255 million, intended to manage the risk of any misalignments between the funds deriving from collections and the sums due against senior costs of the transaction and interest on the senior



1.1 CREDIT RISK

notes. This reserve was funded at the time of the issue of the notes, by a limited recourse loan disbursed by some of the transferring banks. The residual amount of the cash reserve as at 31 December 2024 is € 403 thousand.

C.5 Prudential consolidation - Servicer activities - own securitisations: collections of securitised loans and repayments of notes issued by the special purpose securitisation vehicle

Servicer	Special purpose vehicle	Securitised assets (period-end figure)		Loan collections during the year	
		Non-performing	Performing	Non-performing	Performing
yes	Madeleine spv	0	0	142	233
yes	Dyret spv srl	204	1,866	273	1,345
yes	Petilia Finance srl	3,972	56,076	6,207	49,709
yes	Giorgia	2,244	47,299	2,277	14,020

(Continued)

Percentage of notes repaid (period-end figure)					
Senior		Mezzanine		Junior	
Non-performing assets	Performing assets	Non-performing assets	Performing assets	Non-performing assets	Performing assets
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.1 CREDIT RISK

DISPOSALS

A. Financial assets sold and not fully derecognised

QUALITATIVE INFORMATION

For a description of the transactions contained in tables D.1 and D.2 below, please refer to the footnotes of the tables themselves.

QUANTITATIVE INFORMATION

D.1 PRUDENTIAL CONSOLIDATION - FINANCIAL ASSETS SOLD AND FULLY RECOGNISED AND ASSOCIATED FINANCIAL LIABILITIES: BOOK VALUES	Financial assets sold and fully recognised				Associated financial liabilities		
	Book value	of which: subject to securitisation transactions	of which: subject to contracts of sale with repurchase obligation	of which non- perform- ing	Book value	of which: subject to securitisation transactions	of which: subject to contracts of sale with repurchase obligation
A. Financial assets held for trading	16,329	16,329	0	X	351	351	0
1. Debt securities	0	0	0	X	0	0	0
2. Equity securities	0	0	0	X	0	0	0
3. Loans	16,329	16,329	0	X	351	351	0
4. Derivatives	0	0	0	X	0	0	0
B. Other financial assets mandatorily measured at fair value	0	0	0	0	0	0	0
1. Debt securities	0	0	0	0	0	0	0
2. Equity securities	0	0	0	X	0	0	0
3. Loans	0	0	0	0	0	0	0
C. Financial assets designated at fair value	0	0	0	0	0	0	0
1. Debt securities	0	0	0	0	0	0	0
2. Loans	0	0	0	0	0	0	0
D. Financial assets measured at fair value through other comprehensive income	10,607	10,602	0	770	6,258	6,258	0
1. Debt securities	0	0	0	0	0	0	0
2. Equity securities	0	0	0	X	0	0	0
3. Loans	10,607	10,602	0	770	6,258	6,258	0
E. Financial assets measured at amortised cost	2,742,857	2,690,111	52,746	44,033	2,194,642	1,518,316	676,326
1. Debt securities	52,746	0	52,746	0	676,326	0	676,326
2. Loans	2,690,111	2,690,111	0	44,033	1,518,316	1,518,316	0
Total 2024	2,769,793	2,717,042	52,746	44,803	2,201,251	1,524,925	676,326
Total 2023	2,493,426	2,444,970	48,423	35,382	1,686,772	1,417,146	269,626



1.1 CREDIT RISK

D.3 PRUDENTIAL CONSOLIDATION - SALES TRANSACTIONS RELATING TO LIABILITIES WITH REPAYMENT EXCLUSIVELY BASED ON ASSETS SOLD AND NOT FULLY DERECOGNISED: FAIR VALUE	Fully recognised	Partially recognised	Total	
			2024	2023
A. Financial assets held for trading	16,329	0	16,329	9,846
1. Debt securities	0	0	0	0
2. Equity securities	0	0	0	0
3. Loans	16,329	0	16,329	9,846
4. Derivatives	0	0	0	0
B. Other financial assets mandatorily measured at fair value	0	0	0	0
1. Debt securities	0	0	0	0
2. Equity securities	0	0	0	0
3. Loans	0	0	0	0
C. Financial assets designated at fair value	0	0	0	0
1. Debt securities	0	0	0	0
2. Loans	0	0	0	0
D. Financial assets measured at fair value through other comprehensive income	10,602	0	10,602	17,304
1. Debt securities	0	0	0	0
2. Equity securities	0	0	0	0
3. Loans	10,602	0	10,602	17,304
E. Financial assets measured at amortised cost (fair value)	2,935,458	0	2,935,458	2,528,339
1. Debt securities	0	0	0	0
2. Loans	2,935,458	0	2,935,458	2,528,339
Total financial assets	2,962,389	0	2,962,389	2,555,489
Total associated financial liabilities	1,524,925	0	X	X
Net value 2024	1,437,464	0	1,437,464	X
Net value 2023	1,138,343	0	X	1,138,343

B. Financial assets sold and fully derecognised with recognition of “continuing involvement”

There are no items of this type.

E. PRUDENTIAL CONSOLIDATION - CREDIT RISK MEASUREMENT MODELS

The A-IRB internal rating system constitutes a valid management tools supporting both the sales network and the central structures in lending decisions, renewals and management.



1.2.1 INTEREST RATE AND PRICE RISK – REGULATORY TRADING BOOK

QUALITATIVE INFORMATION

A. General aspects

“Market risks” identifies risks connected to the effects on income flows and on the economic value of the Group of unexpected changes in the level of interest and exchange rates, equity and commodities prices, as well as the relative expected volatility. For a financial intermediary, market risks represent a central component of the broader economic risk, or the risk linked to the possibility that the profit generated will differ from shareholder and management expectations.

As part of the strategies approved by the Board of Directors, the General Management of the Parent Company, supported by the Risks and ALM Committee, plays a key role in the management and control of market risks.

The General Manager of the Parent Company is responsible for operating within the limits established in the “Regulation of delegated powers on financial transactions”, with the right of sub-delegation, including partially, to the various competent players, possibly after consulting with the Risks and ALM Committee.

The Risks and ALM Committee analyses the Group’s capital and financial structure, proposing management policies, taking into account the evolution of the financial markets, with respect for the restrictions imposed by the Supervisory Body and the operating limits established by the Board of Directors for the management of interest rate, price and exchange rate risk.

The Parent Company’s Integrated Treasury Office manages interest rate and exchange rate risk according to defined strategies within the scope of the delegations received.

The Group’s objective is to maintain a good balance between the balance sheet (and off-balance sheet) assets and liabilities of the banking book in terms of sensitivity to any change in the market interest rate curve.

The structure of internal transfer rates is reviewed annually when drafting the budget document. In the guidelines for the preparation of the budget for the year 2024, the criteria already used for the financial year ending December 2023 (at the time amended to meet the significantly changed market context in terms of the level of interest rates, including short-term rates), were substantially confirmed with the re-proposal of some adjustments made for the treatment of on-demand items. The criteria were deemed consistent in considering the component linked to liquidity risk generated by the individual business units, and as a result capable of making costs concerning risk assumption within the units consistent with the exposure to liquidity risk that is generated for the Group overall as well as with company policies.

The Parent Company’s Integrated Risk Control Office checks for respect for the risk limits and operating powers on financial transactions by means of systematic monitoring on the Group’s exposure to market, interest rate and exchange rate risks, while also monitoring the effectiveness of the procedures adopted for measuring and monitoring risks, reporting and proposing improvements.



1.2 MARKET RISK

Trading activities (FVTPL portfolio) are used as a supplementary source of revenues in the overall management of the proprietary finance segment.

B. Management procedures and measurement methods for interest rate risk and price risk

Exposure to market risks characterises, although to different extents and in different manners, both the portfolio of financial assets managed for trading purposes and the banking book.

The regulatory trading book consists of positions in financial instruments and commodities held for trading purposes or to hedge risk inherent in other elements in the same portfolio. The instruments must lack any clause limiting their negotiability or, alternatively, must be eligible for hedging.

The positions held for trading purposes are those intentionally meant for subsequent sale in the short term and/or acquired in order to benefit, in the short term, from differences between the purchase and sale price or other changes in prices or interest rates. Positions refer to positions in and of themselves as well as positions deriving from services to customers or to support trading (market making).

With reference to the methodologies for measuring market risks for the regulatory trading book, please refer to what will be described in the section on “General aspects, management procedures and measurement methods for interest rate risk and price risk in the banking book”.

The Group measures market risk in order to determine the capital requirement by applying the standardised method.



QUANTITATIVE INFORMATION

1. REGULATORY TRADING BOOK: BREAKDOWN BY RESIDUAL MATURITY (REPRICING DATE) OF BALANCE SHEET FINANCIAL ASSETS AND LIABILITIES AND FINANCIAL DERIVATIVES: EURO	On demand	Up to 3 months	3 to 6 months	6 months to 1 year	1 to 5 years	5 to 10 years	Over 10 years	Unspecified maturity
Type/Residual maturity								
1. Balance sheet assets	541	32	1,800	0	85,884	0	0	0
1.1 Debt securities	0	0	0	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	0	0	0	0	0	0	0
1.2 Other assets	541	32	1,800	0	85,884	0	0	0
2. Balance sheet liabilities	0	0	0	0	0	0	0	0
2.1 Repurchase agreements	0	0	0	0	0	0	0	0
2.2 Other liabilities	0	0	0	0	0	0	0	0
3. Financial derivatives								
3.1 With underlying security								
- Options								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0
- Other derivatives								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0
3.2 Without underlying security								
- Options								
+ Long positions	0	251	626	1,457	17,004	1,530	0	0
+ Short positions	0	454	643	1,608	16,787	1,377	0	0
- Other derivatives								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0

3. Regulatory trading book: internal models and other sensitivity analysis methods

Considering both the low amounts and the composition of the portfolio (almost entirely attributable to salary/pension-backed loans intended to be sold transferred over a period of a few months), it was not deemed appropriate to proceed with further sensitivity analyses.



1.2 MARKET RISK

1.2.2 INTEREST RATE AND PRICE RISK - BANKING BOOK

QUALITATIVE INFORMATION

A. General aspects, management procedures and measurement methods for interest rate risk and price risk

Interest rate risk, understood as the potential decline in the economic value of items as a result of changes in the level of market rates, derives from the mismatching of maturities and/or repricing between assets and liabilities in the banking book.

The banking book includes:

- assets and liabilities generated by treasury operations and therefore interbank deposits given and received, repurchase agreements, bonds held in the bank-owned portfolio, derivative contracts hedging interest rate risk (IRS, OIS and FRA), etc.;
- assets and liabilities generated by operations with ordinary customers; in this case, the risk is strictly linked to the Group's commercial funding and lending policies, and is allocated to the Treasury through an internal transfer rates system.

Price risk is related to the typical volatility in the value of financial instruments such as equity securities, UCITS and derivative contracts on such instruments.

As regards the structures responsible for the management and control of interest rate and price risk, please refer to the section above "General aspects" dealing with interest rate risk and price risk - Regulatory trading book.

The Group's strategic objective is to limit its exposure to interest rate risk, in line with what is laid out in the Risk Appetite Framework, to a level deemed balanced and compatible with its capital and financial stability.

The strategies concerning interest rate risk management, set forth in the "Group Policies on interest rate risk and hedge accounting", call for recourse to natural hedges any time the financial structure of the assets and liabilities so permits, and their integration, when necessary, by entering into derivative contracts.

Management and strategic decisions are aimed at minimising the volatility of overall economic value as market rate structures change, as can be seen in the limits set in the "Regulation of delegated powers on financial transactions".

In this regard, the "Group financial investment policies" allow for, if applicable, a component in OTC derivatives (IRS, OIS, FRA, etc.) primarily intended to hedge interest rate risk on Group asset and liability items.

The overall mismatching profile is defined through management of the ALM, that allows for the definition of the overall risk profile and for each individual time bucket, through the assignment of all Group positions (or, if desired, part of them), to the relative repricing time bands.

To measure the financial risks generated by the banking book, the Group relies on the following methodologies:

- VaR with historical simulation and compatible loss, for investments in financial instruments held in the FVOCI portfolio owned; Analysis of change in EVE (Economic Value of Equity) and NII (Net Interest Income) on the basis of the provisions of the ITS (Implementing Technical Standards)



which, since the end of September 2024, have supplemented and substantially updated the methodology based on the provisions of Annexes C and C-bis of Part One, Title III - Chapter 1 of Circular 285 of the Bank of Italy (in force until the 48th update of the circular) supplemented by behavioural models relating to the treatment of demand items and the prepayment of “salary/pension-backed loans”.

The potential changes in the economic value and net interest margin of the items included in the banking book resulting from adverse changes in the level of rates are quantified through the placement into 19 time brackets of fixed-rate assets and liabilities based on their residual life and floating rate assets and liabilities are recognised in the different time brackets based on the interest rate renegotiation date.

The changes in the level of rates applied are those envisaged by the EBA, i.e. six scenarios (parallel shock up, parallel shock down, steepener shock, flattener shock, short rates shock up and short rates shock down), already provided for in the EBA 2018/02 Guidelines, in the case of the analysis of the change in economic value and two scenarios (parallel shock up and parallel shock down) in the case of the analyses concerning changes in the net interest margin.

In the case of the reduction scenarios, the EBA floor pursuant to point (k) of the EBA/GL/2018/02 Guidelines is applied.

The reports representing the output of the processing described above is brought to the attention of the Risks and ALM Committee by the Risk Control Function, in order to facilitate the determination of the strategies to be adopted in relation to the prospects of market rate fluctuations.

The stress test procedures involve the performance of further analyses based on historical changes in the level of interest rates (i.e. decreases and increases equal to the 1st and 99th percentiles respectively of the annual changes in interest rates recorded in an observation period of 6 years).

B. Fair value hedging

The adoption of the Fair Value Option and the Fair Value Hedge has the objective of eliminating or reducing valuation inconsistencies deriving from changes in the fair value of funding and lending instruments caused by interest rate curve fluctuations, in cases in which the application of the ordinary accounting rules established for the applicable category does not allow for a more reliable representation of information in the financial statements.

The hedge is linked only to interest rate risk.

The “Group Policies on interest rate risk and hedge accounting” define the model of responsibilities and processes for the management and control of interest rate risk and the relative accounting treatment (hedge accounting), consistent with the nature of the Group and its degree of complexity, in compliance with Supervisory regulations and internal regulations.

As set forth by IFRS 9, the Group has currently decided to opt out, with the resulting maintenance of the rules relating to hedge accounting governed by IAS 39, therefore


1.2 MARKET RISK

without applying the new General Hedge principle (option available until the IASB provides a consolidated and shared regulatory framework on macro-hedges).

The types of derivatives used consist of “over the counter” interest rate swap (IRS) contracts. Hedged assets and liabilities include bonds acquired or issued by the Group Banks and fixed rate loans.

C. Cash flow hedging

Cash flow hedge is the accounting model for the hedging of exposure to the variability of flows associated with assets or liabilities or highly likely future transactions depending on a specific risk. The risk hedged, in this case, is interest rate risk, consisting of the possibility that future changes in the level of market rates may negatively influence company results.

Keeping in mind that a derivative used for risk management on a net basis may be considered indistinctly as a Fair Value Hedge or a Cash Flow Hedge instrument (an IRS, which pays fixed and receives variable, may be considered a hedge of a fixed rate asset or a variable rate liability), the Group adopts the Cash Flow Hedge methodology for the accounting treatment of OTC derivatives (interest rate swaps) entered into for the hedging of net positions.

The objective pursued by the hedge is to stabilise the interest flow from variable rate deposits to the extent that the latter finances fixed rate loans.

As also noted previously, the Group has developed a specific internal policy that defines the roles and duties of the company figures involved.

PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES



1.2 MARKET RISK

QUANTITATIVE INFORMATION

1. BANKING BOOK: BREAKDOWN BY RESIDUAL MATURITY (REPRICING DATE) OF FINANCIAL ASSETS AND LIABILITIES: EURO	On demand	Up to 3 months	3 to 6 months	6 months to 1 year	1 to 5 years	5 to 10 years	Over 10 years	Unspecified maturity
Type/Residual maturity								
1. Balance sheet assets	3,135,597	1,578,502	662,348	451,215	2,146,099	2,990,133	1,178,803	0
1.1 Debt securities	0	218,929	126,516	196,954	455,803	1,754,857	338,609	0
- with early repayment option	0	14,514	17,010	482	8,449	0	15,572	0
- other	0	204,415	109,506	196,473	447,353	1,754,857	323,037	0
1.2 Loans to banks	895,403	66,869	0	0	0	0	0	0
1.3 Loans to customers	2,240,194	1,292,704	535,832	254,261	1,690,296	1,235,276	840,194	0
- c/a	371,293	484	0	0	84	1,209	0	0
- other loans	1,868,901	1,292,220	535,832	254,261	1,690,212	1,234,068	840,194	0
- with early repayment option	1,503,135	1,116,717	430,368	141,771	796,495	583,350	834,239	0
- other	365,766	175,503	105,464	112,490	893,717	650,717	5,954	0
2. Balance sheet liabilities	6,322,034	1,149,659	1,552,286	321,697	1,962,993	17,572	3,489	0
2.1 Deposits from customers	6,254,350	770,177	1,368,478	268,937	928,520	9,749	3,016	0
- c/a	6,183,357	504,757	56,617	266,027	910,627	0	0	0
- other liabilities	70,993	265,420	1,311,860	2,910	17,893	9,749	3,016	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	70,993	265,420	1,311,860	2,910	17,893	9,749	3,016	0
2.2 Deposits from banks	16,891	11	5,064	5,109	667,811	734	473	0
- c/a	8,559	0	0	0	0	0	0	0
- other liabilities	8,332	11	5,064	5,109	667,811	734	473	0
2.3 Debt securities	50,793	379,471	178,744	47,651	366,662	7,089	0	0
- with early repayment option	0	0	178,344	0	0	0	0	0
- other	50,793	379,471	400	47,651	366,662	7,089	0	0
2.4 Other liabilities	0	0	0	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	0	0	0	0	0	0	0
3. Financial derivatives								
3.1 With underlying security								
- Options								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0
- Other								
+ Long positions	958	111	0	0	12	0	0	0
+ Short positions	0	1037	48	0	0	0	0	0
3.2 Without underlying security								
- Options								
+ Long positions	0	453	643	1,608	16,786	1,377	1	0
+ Short positions	0	251	625	1,456	17,002	1,531	1	0
- Other derivatives								
+ Long positions	0	1,367,453	975,994	20,669	117,589	189,951	15,753	0
+ Short positions	0	396,008	14,818	28,308	400,511	1,603,801	242,621	0
4. Other off-balance sheet transactions								
+ Long positions	113,964	0	0	0	0	0	0	0
+ Short positions	113,964	0	0	0	0	0	0	0



1.2 MARKET RISK

1. BANKING BOOK: BREAKDOWN BY RESIDUAL MATURITY (REPRICING DATE) OF FINANCIAL ASSETS AND LIABILITIES: OTHER CURRENCIES	On demand	Up to 3 months	3 to 6 months	6 months to 1 year	1 to 5 years	5 to 10 years	Over 10 years	Unspecified maturity
Type/Residual maturity								
1. Balance sheet assets	16,724	2,747	1,071	0	0	0	0	0
1.1 Debt securities	0	0	0	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	0	0	0	0	0	0	0
1.2 Loans to banks	15,419	0	0	0	0	0	0	0
1.3 Loans to customers	1,305	2,747	1,071	0	0	0	0	0
- c/a	1,305	0	0	0	0	0	0	0
- other loans	0	2,747	1,071	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	2,747	1,071	0	0	0	0	0
2. Balance sheet liabilities	21,047	0	0	0	0	0	0	0
2.1 Deposits from customers	21,047	0	0	0	0	0	0	0
- c/a	21,047	0	0	0	0	0	0	0
- other liabilities	0	0	0	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	0	0	0	0	0	0	0
2.2 Deposits from banks	0	0	0	0	0	0	0	0
- c/a	0	0	0	0	0	0	0	0
- other liabilities	0	0	0	0	0	0	0	0
2.3 Debt securities	0	0	0	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	0	0	0	0	0	0	0
2.4 Other liabilities	0	0	0	0	0	0	0	0
- with early repayment option	0	0	0	0	0	0	0	0
- other	0	0	0	0	0	0	0	0
3. Financial derivatives								
3.1 With underlying security								
- Options								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0
- Other								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0
3.2 Without underlying security								
- Options								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0
- Other derivatives								
+ Long positions	0	269	0	0	0	0	0	0
+ Short positions	0	1,606	0	0	0	0	0	0
4. Other off-balance sheet transactions								
+ Long positions	0	0	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0	0	0



2. Banking book: internal models and other sensitivity analysis methods

SENSITIVITY ANALYSIS METHODOLOGIES

The interest rate risk on the banking book, expressed in terms of economic value at risk and calculated on the worst-case scenario (in terms of the most unfavourable change for the Group) from those envisaged by the EBA ITS, as at 31 December 2024, is equal to 6.0% of Tier 1, well below the 15% limit set by the new international regulation on SOTs (Supervisory Outlier Tests). These findings confirm the balancing of the banking book items in terms of sensitivity to adverse movements, including significant ones, of the market rate curve. The aforementioned balancing is also achieved thanks to the active management of this risk by the Finance Function on the owned securities portfolio through the use of interest rate swap derivative instruments.

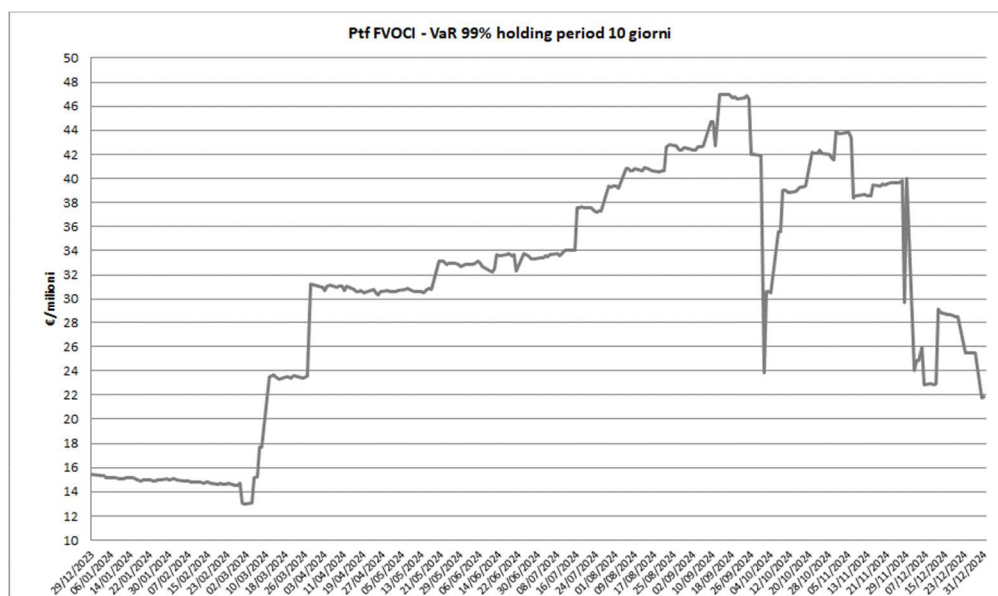
With regard to the exposure to IRRBB expressed in terms of the change in net interest margin, the value stands at 3.74% of Tier 1, also in this case well below the 5% trigger envisaged by the EBA SOTs.

Without prejudice to the aforementioned methodological change dictated by the recent regulatory update on IRRBB, in conjunction with the quarterly surveys of Pillar II capital absorption, the exposure in terms of EVE delta recorded values of 0.7% and 0.1%, respectively, of own funds in March and June 2024 (zero at the end of the previous year). In September 2024, the measurement, already calculated using the methodology provided for by the ITS EBA, stood at 4.3%.

At the end of 2024, the historical simulation-based VaR (10 days holding period and 99% confidence interval) calculated on the bank-owned portfolio in the FVOCI (Held to Collect and Sell business model) amounted to € 21.8 million; during the year the average value was € 31.2 million, the minimum value was € 13 million and the maximum value was € 47 million.



1.2 MARKET RISK



The control on other limits set forth in the “Regulation of delegated powers on financial transactions” of the Group Banks is performed by the Risk Control Function with the support of the platform provided by the IT outsourcer Myrios.

1.2.3 EXCHANGE RATE RISK

QUALITATIVE INFORMATION

A. General aspects, management procedures and measurement methods for exchange rate risk

The Group is exposed to exchange rate risk as a result of its trading activities in the currency markets and its investment and fundraising activities with instruments denominated in currencies other than the Euro.

The Parent Company’s Integrated Treasury Office is responsible for the management of exchange rate risk.

The monitoring of the foreign exchange position, determined as the sum of the absolute values of the net positions of the individual currencies, is performed daily by the Parent Company’s Integrated Risk Control Office, which verifies respect for the limit set by the Board of Directors and periodically provides the required disclosure to the Risks and ALM Committee.

In monitoring activities, the Group uses the Myrios FM platform.

In observance of the limits established by the “Regulation of delegated powers on financial transactions”, the global intraday and overnight position is monitored, as defined previously, as well as the daily stop loss on the open position.



B. Hedging of exchange rate risk

Hedging of exchange rate risk, under the responsibility of the Parent Company's Integrated Treasury Office, tends towards minimising currency exposure by entering into agreements with credit counterparties intended to hedge the positions at risk.

QUANTITATIVE INFORMATION

1. BREAKDOWN BY CURRENCY OF ASSETS, LIABILITIES AND DERIVATIVES Items	Currencies					
	Russian Ruble	Australian Dollar	US Dollar	British Pound Sterling	Swiss Franc	Other currencies
A. Financial assets	243	50	16,841	2,540	646	222
A.1 Debt securities	0	0	0	0	0	0
A.2 Equity securities	0	0	0	0	0	0
A.3 Loans to banks	243	50	11,718	2,540	646	222
A.4 Loans to customers	0	0	5,123	0	0	0
A.5 Other financial assets	0	0	0	0	0	0
B. Other assets	0	139	1,415	297	567	375
C. Financial liabilities	235	188	16,620	2,830	1,171	3
C.1 Deposits from banks	0	0	0	0	0	0
C.2 Deposits from customers	235	188	16,620	2,830	1,171	3
C.3 Debt securities	0	0	0	0	0	0
C.4 Other financial liabilities	0	0	0	0	0	0
D. Other liabilities	0	0	993	0	0	0
E. Financial derivatives						
- Options						
+ Long positions	0	0	0	0	0	0
+ Short positions	0	0	0	0	0	0
- Other derivatives						
+ Long positions	0	0	237	0	0	32
+ Short positions	0	0	557	16	28	524
Total assets	243	189	18,493	2,837	1,213	629
Total liabilities	235	188	18,170	2,846	1,199	527
Difference (+/-)	8	1	323	-9	14	102

2. Internal models and other sensitivity analysis methods

Considering the low amounts in question, it was not deemed appropriate to proceed with additional sensitivity analyses.



1.3 DERIVATIVES AND HEDGING POLICIES

1.3.1 TRADING DERIVATIVES

A. Financial derivatives

A.1 FINANCIAL TRADING DERIVATIVES: NOTIONAL AMOUNTS AT YEAR END	Total 2024				Total 2023			
	Central Counterparties	Over the counter		Organised markets	Central Counterparties	Over the counter		Organised markets
		Without central counterparties				Without central counterparties		
		With netting agreements	Without netting agreements			With netting agreements	Without netting agreements	
Underlying assets/Derivative types								
1. Debt securities and interest rates	0	762,484	1,283	0	0	116,942	1,488	0
a) Options	0	1,283	1,283	0	0	1,488	1,488	0
b) Swaps	0	761,201	0	0	0	115,454	0	0
c) Forwards	0	0	0	0	0	0	0	0
d) Futures	0	0	0	0	0	0	0	0
e) Other	0	0	0	0	0	0	0	0
2. Equity securities and stock indices	0	0	165	0	0	0	334	0
a) Options	0	0	165	0	0	0	334	0
b) Swaps	0	0	0	0	0	0	0	0
c) Forwards	0	0	0	0	0	0	0	0
d) Futures	0	0	0	0	0	0	0	0
e) Other	0	0	0	0	0	0	0	0
3. Gold and currencies	0	0	482	0	0	0	936	0
a) Options	0	0	0	0	0	0	0	0
b) Swaps	0	0	482	0	0	0	423	0
c) Forwards	0	0	0	0	0	0	513	0
d) Futures	0	0	0	0	0	0	0	0
e) Other	0	0	0	0	0	0	0	0
4. Commodities	0	0	0	0	0	0	0	0
5. Other	0	0	0	0	0	0	0	0
Total	0	762,484	1,930	0	0	116,942	2,758	0



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.3 DERIVATIVES AND HEDGING POLICIES

A.2 FINANCIAL TRADING DERIVATIVES: GROSS POSITIVE AND NEGATIVE FAIR VALUE - BREAKDOWN BY PRODUCT Types of derivatives	Total 2024				Total 2023			
	Over the counter			Organised markets	Over the counter			Organised markets
	Central Counterparties	Without central counterparties			Central Counterparties	Without central counterparties		
		With netting agreements	Without netting agreements			With netting agreements	Without netting agreements	
1. Positive fair value								
a) Options	0	30	0	0	0	85	0	0
b) Interest rate swaps	0	55	0	0	0	873	0	0
c) Cross currency swaps	0	0	2	0	0	0	1	0
d) Equity swaps	0	0	0	0	0	0	0	0
e) Forwards	0	0	0	0	0	0	5	0
f) Futures	0	0	0	0	0	0	0	0
g) Other	0	0	0	0	0	0	0	0
Total	0	85	2	0	0	958	6	0
2. Negative fair value								
a) Options	0	0	30	0	0	0	188	0
b) Interest rate swaps	0	1,905	0	0	0	1,781	0	0
c) Cross currency swaps	0	0	1	0	0	0	2	0
d) Equity swaps	0	0	0	0	0	0	0	0
e) Forwards	0	0	0	0	0	0	3	0
f) Futures	0	0	0	0	0	0	0	0
g) Other	0	0	0	0	0	0	0	0
Total	0	1,905	31	0	0	1,781	193	0



1.3 DERIVATIVES AND HEDGING POLICIES

A.3 OTC FINANCIAL TRADING DERIVATIVES - NOTIONAL AMOUNTS, GROSS POSITIVE AND NEGATIVE FAIR VALUE BY COUNTERPARTY	Central Counterparties	Banks	Other financial companies	Other entities
Underlying assets				
Contracts not subject to netting agreements				
1) Debt securities and interest rates	X	0	0	1,312
- notional amount	X	0	0	1,283
- positive fair value	X	0	0	0
- negative fair value	X	0	0	29
2) Equity securities and stock indices	X	166	0	0
- notional amount	X	165	0	0
- positive fair value	X	0	0	0
- negative fair value	X	1	0	0
3) Gold and currencies	X	485	0	0
- notional amount	X	482	0	0
- positive fair value	X	2	0	0
- negative fair value	X	1	0	0
4) Commodities	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
5) Other	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
Contracts included in netting agreements				
1) Debt securities and interest rates	0	764,474	0	0
- notional amount	0	762,484	0	0
- positive fair value	0	85	0	0
- negative fair value	0	1,905	0	0
2) Equity securities and stock indices	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0
3) Gold and currencies	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0
4) Commodities	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0
5) Other	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.3 DERIVATIVES AND HEDGING POLICIES

A.4 RESIDUAL LIFE OF OTC FINANCIAL DERIVATIVES: NOTIONAL AMOUNTS	Up to 1 year	1 to 5 years	Over 5 years	Total
Underlying/Residual life				
A.1 Financial derivatives on debt securities and interest rates	15,030	698	748,039	763,767
A.2 Financial derivatives on equity securities and stock indices	165	0	0	165
A.3 Financial derivatives on currencies and gold	482	0	0	482
A.4 Financial derivatives on commodities	0	0	0	0
A.5 Other financial derivatives	0	0	0	0
Total 2024	15,677	698	748,039	764,414
Total 2023	936	15,844	102,920	119,700

B. Credit derivatives

There are no items of this type.

1.3.2 HEDGES

QUALITATIVE INFORMATION

A. Fair value hedging

The adoption of the Fair Value Option and the Fair Value Hedge has the objective of eliminating or reducing valuation inconsistencies deriving from changes in the fair value of funding and lending instruments caused by interest rate curve fluctuations, in cases in which the application of the ordinary accounting rules established for the applicable category does not allow for a more reliable representation of information in the financial statements. The hedge is linked only to interest rate risk.

The “Group Policies on interest rate risk and hedge accounting” define the model of responsibilities and processes for the management and control of interest rate risk and the related accounting treatment (hedge accounting), consistent with the nature of the Group and its degree of complexity, in compliance with Supervisory regulations and internal regulations.

As set forth by IFRS 9, the Group has currently decided to opt out, with the resulting maintenance of the rules relating to hedge accounting governed by IAS 39, therefore without applying the new General Hedge principle (option available until the IASB is able to provide a consolidated and shared regulatory framework on macro-hedges). The types of derivatives used consist of “over the counter” interest rate swap (IRS) contracts. Hedged assets and liabilities include bonds acquired or issued by the Group Banks and fixed rate loans.

B. Cash flow hedging

Cash flow hedge is the accounting model for the hedging of exposure to the variability of flows associated with assets or liabilities or highly likely future



1.3 DERIVATIVES AND HEDGING POLICIES

transactions depending on a specific risk. The risk hedged, in this case, is interest rate risk, consisting of the possibility that future changes in the level of market rates may negatively influence company results.

Keeping in mind that a derivative used for risk management on a net basis may be considered indistinctly as a Fair Value Hedge or a Cash Flow Hedge instrument (an IRS, which pays fixed and receives variable, may be considered a hedge of a fixed rate asset or a variable rate liability), the Bank adopts the Cash Flow Hedge methodology for the accounting treatment of OTC derivatives (interest rate swaps) entered into for the hedging of net positions.

The objective pursued by the hedge is to stabilise the interest flow from variable rate deposits to the extent that the latter finances fixed rate loans.

As also noted previously, the Bank has developed a specific internal policy that defines the roles and duties of the company figures involved.

C. Hedging of foreign investments

There are no items of this type.

D. Hedging instruments

The types of derivatives used are represented by “over the counter” interest rate swap (IRS) contracts.

E. Hedged items

The precisely identified assets and liabilities hedged include bonds acquired or issued by the Bank.

Disclosure relating to the impacts of the "Benchmark Reform" on interest rate hedging relationships.

The disclosure required by paragraph 24H of IFRS 7, as modified by the "Amendments to IFRS 9, IAS 39 and IFRS 7: Interest Rate Benchmark Reform", is provided below.

This disclosure refers to hedging relationships to which temporary exceptions apply as per paragraphs 6.8.4 - 6.8.12 of IFRS 9, as envisaged in the Amendment.

Given the above, note first of all that, as regards management of the process of transition to the new benchmark rates, the Group implemented process, system and internal regulations analyses for the management of the reform as a whole.

With regard to the benchmark rates, to which the hedging relationships were exposed as at 31 December 2024 (Euribor benchmark rate only), note that the current Euribor rates, following transition to the new calculation method at the end of 2019, were compliant with provisions of the *EU Benchmarks Regulation of 2016*.

The Eonia index was disposed of at the end of 2021. The ECB Working Group identified the €STR (Euro Short-Term Rate) as the index that replaces Eonia. To manage the transition from Eonia to €STR, the ECB Working Group recommended recalibration of the Eonia index as €STR + 8.5 bps, with publication of the latter



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.3 DERIVATIVES AND HEDGING POLICIES

from 3 January 2022. With reference to the Libor rates (CHF and GBP, USD and YEN), they were also disposed of.

With reference to the Libor rate, it was not used in the hedging relationships put in place by the Cassa di Risparmio di Asti Group.

Consequently, given the existing positions and in reference to available information and that obtainable from hedge accounting assumptions, in order to assess the forward-looking effectiveness of the hedges, as at 31 December 2024 the Bank does not expect any impact on the hedging relationships.



1.3 DERIVATIVES AND HEDGING POLICIES

QUANTITATIVE INFORMATION

A. Financial hedging derivatives

A.1 FINANCIAL HEDGING DERIVATIVES: NOTIONAL AMOUNTS AT YEAR END	Total 2024				Total 2023			
	Over the counter			Organised markets	Over the counter			Organised markets
	Central Counterparties	Without central counterparties			Central Counterparties	Without central counterparties		
		With netting agreements	Without netting agreements			With netting agreements	Without netting agreements	
Underlying assets/Derivative types	Central Counterparties	With netting agreements	Without netting agreements	Organised markets	Central Counterparties	With netting agreements	Without netting agreements	Organised markets
1. Debt securities and interest rates	0	1,929,279	0	0	0	2,341,832	0	0
a) Options	0	0	0	0	0	0	0	0
b) Swaps	0	1,929,279	0	0	0	2,341,832	0	0
c) Forwards	0	0	0	0	0	0	0	0
d) Futures	0	0	0	0	0	0	0	0
e) Other	0	0	0	0	0	0	0	0
2. Equity securities and stock indices	0	0	0	0	0	0	0	0
a) Options	0	0	0	0	0	0	0	0
b) Swaps	0	0	0	0	0	0	0	0
c) Forwards	0	0	0	0	0	0	0	0
d) Futures	0	0	0	0	0	0	0	0
e) Other	0	0	0	0	0	0	0	0
3. Gold and currencies	0	0	0	0	0	0	0	0
a) Options	0	0	0	0	0	0	0	0
b) Swaps	0	0	0	0	0	0	0	0
c) Forwards	0	0	0	0	0	0	0	0
d) Futures	0	0	0	0	0	0	0	0
e) Other	0	0	0	0	0	0	0	0
4. Commodities	0	0	0	0	0	0	0	0
5. Other	0	0	0	0	0	0	0	0
Total	0	1,929,279	0	0	0	2,341,832	0	0



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.3 DERIVATIVES AND HEDGING POLICIES

A.2 FINANCIAL HEDGING DERIVATIVES: GROSS POSITIVE AND NEGATIVE FAIR VALUE - BREAKDOWN BY PRODUCT	Positive and negative fair value								Change in value used to calculate the ineffectiveness of the hedge	
	Total 2024				Total 2023				Total 2024	Total 2023
	Over the counter			Organised markets	Over the counter			Organised markets		
	Central Counterparties	Without central counterparties			Central Counterparties	Without central counterparties				
		With netting agreements	Without netting agreements			With netting agreements	Without netting agreements			
Types of derivatives	Central Counterparties	With netting agreements	Without netting agreements	Organised markets	Central Counterparties	With netting agreements	Without netting agreements	Organised markets	Total 2024	Total 2023
Positive fair value										
a) Options	0	0	0	0	0	0	0	0	0	0
b) Interest rate swaps	0	2	0	0	0	18,312	0	0	0	0
c) Cross currency swaps	0	0	0	0	0	0	0	0	0	0
d) Equity swaps	0	0	0	0	0	0	0	0	0	0
e) Forwards	0	0	0	0	0	0	0	0	0	0
f) Futures	0	0	0	0	0	0	0	0	0	0
g) Other	0	0	0	0	0	0	0	0	0	0
Total	0	2	0	0	0	18,312	0	0	0	0
Negative fair value										
a) Options	0	0	0	0	0	0	0	0	0	0
b) Interest rate swaps	0	79,531	0	0	0	112,954	0	0	0	0
c) Cross currency swaps	0	0	0	0	0	0	0	0	0	0
d) Equity swaps	0	0	0	0	0	0	0	0	0	0
e) Forwards	0	0	0	0	0	0	0	0	0	0
f) Futures	0	0	0	0	0	0	0	0	0	0
g) Other	0	0	0	0	0	0	0	0	0	0
Total	0	79,531	0	0	0	112,954	0	0	0	0



1.3 DERIVATIVES AND HEDGING POLICIES

A.3 OTC FINANCIAL HEDGING DERIVATIVES - NOTIONAL AMOUNTS, GROSS POSITIVE AND NEGATIVE FAIR VALUE BY COUNTERPARTY	Central Counterparties	Banks	Other financial companies	Other entities
Underlying assets				
Contracts not subject to netting agreements				
1) Debt securities and interest rates	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
2) Equity securities and stock indices	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
3) Gold and currencies	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
4) Commodities	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
5) Other	X	0	0	0
- notional amount	X	0	0	0
- positive fair value	X	0	0	0
- negative fair value	X	0	0	0
Contracts included in netting agreements				
1) Debt securities and interest rates	0	1,825,565	183,247	0
- notional amount	0	1,754,279	175,000	0
- positive fair value	0	2	0	0
- negative fair value	0	71,284	8,247	0
2) Equity securities and stock indices	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0
3) Gold and currencies	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0
4) Commodities	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0
5) Other	0	0	0	0
- notional amount	0	0	0	0
- positive fair value	0	0	0	0
- negative fair value	0	0	0	0



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES

1.3 DERIVATIVES AND HEDGING POLICIES

A.4 RESIDUAL LIFE OF OTC FINANCIAL HEDGING DERIVATIVES: NOTIONAL AMOUNTS Underlying/Residual life	Up to 1 year	1 to 5 years	Over 5 years	Total
A.1 Financial derivatives on debt securities and interest rates	0	240,000	1,689,279	1,929,279
A.2 Financial derivatives on equity securities and stock indices	0	0	0	0
A.3 Financial derivatives on currencies and gold	0	0	0	0
A.4 Financial derivatives on commodities	0	0	0	0
A.5 Other financial derivatives	0	0	0	0
Total 2024	0	240,000	1,689,279	1,929,279
Total 2023	0	150,000	2,191,832	2,341,832

B. Credit hedging derivatives

There are no items of this type.

C. Non-derivative hedging instruments

There are no items of this type.

D. Hedged instruments

There are no items of this type.

E. Effects of hedging transactions on shareholders' equity

There are no items of this type.

1.3.3 OTHER INFORMATION ON DERIVATIVES (TRADING AND HEDGING)

There are no items of this type.



1.4 LIQUIDITY RISK

QUALITATIVE INFORMATION

A. General aspects, management procedures and measurement methods for liquidity risk

Liquidity risk is the risk that the Group may not be capable of meeting its obligations at their maturity. Liquidity risk includes the possibility that the Group Companies may be unable to maintain their payment commitments due to their incapacity to obtain new funds (funding liquidity risk) and/or the incapacity to liquidate their assets in the market (market liquidity risk) due to the existence of limits on disinvestment. Liquidity risk also includes the risk of dealing with payment commitments at non-market costs or incurring a high cost of funding and/or incurring capital losses due to the disinvestment of the assets.

Liquidity risk derives from transactions carried out with customers, Treasury operations and all other transactions required to guarantee the proper functioning of the structure overall which generate liquidity requirements.

Within the strategies and operating limits established by the Board of Directors, as well as the management guidelines of the General Manager, the Parent Company's Integrated Treasury Office is responsible for ensuring effective and active liquidity management.

The General Management supervises and guides investment activities and ensures the effectiveness of the control oversight mechanisms in compliance with the strategies and restrictions approved by the Board of Directors, taking into account the opinions of the Risks and ALM Committee and the Group Financial Investment Policies Committee.

The Finance Function selects and manages financial investments on the basis of the delegated powers in compliance with the guidelines of its General Management and Group regulations, and develops proposals concerning the financial investment strategies and guidelines to be subjected to the analysis of the Group Financial Investment Policies Committee.

Furthermore, the Finance Function is responsible for supervising overall Group financial management, ensuring the maintenance of adequate liquidity conditions, the optimisation of the risk/return ratio of owned financial resources and the management of exposure to liquidity risk at global level.

The Risks and ALM Committee oversees the Group liquidity position and proposes suitable operating guidelines to optimise it.

The "Regulation on financial transactions" attributes management of the Group funding policy to the Parent Company's Finance Function, with different levels of delegation and within the approved credit lines.

Direct funding from retail customers was confirmed as the largely key component of funding sources. The additional sources of funding used by the Group are represented at the closing of 2024 by the institutional funding obtained through repurchase agreements with "Cassa di Compensazione e Garanzia" and with institutional counterparties, and the market placement of part of the notes deriving from securitisation transactions on its own loans (with regard to refinancing with the ECB, the early repayment of all TLTRO operations during the financial year is highlighted), to which is added, as at 31 December 2024,



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES 1.4 LIQUIDITY RISK

The use of the main wholesale procurement channels was possible thanks to the availability of eligible notes, including those deriving from the securitisation of loans. At the same time, in line with what is established in the “Group financial investment policies”, the Group has pursued the strategy of investing excess liquidity primarily in government securities issued by the Italian State, traded in an active market and with the requirements established to be used to back refinancing transactions (eligible securities), so as to guarantee itself the possibility of their possible disinvestment within a brief period of time or, alternatively, access to Eurosystem sources of funds.

The inflows deriving from the liquidation of interest expense accrued on variable rate bonds are partially stabilised through recourse to the cash flow hedge accounting technique, a more detailed description of which is provided in point C of Section 2 – Market risks, paragraph 2.2.

The Parent Company’s Risks Control Department performs systematic controls over the liquidity position and the breakdown of the bank-owned portfolio, providing adequate disclosure to the General Management and the Risks and ALM Committee. The proper management and adequate monitoring of company liquidity also involve processes, instruments and methodologies that embrace distinct areas represented by operating liquidity, structural liquidity and strategic liquidity.

Aware of this, the Group has adopted specific “Group Liquidity Policies” with a view to establishing principles and guidelines for the efficient and effective management of its liquidity, in order to respect Supervisory and internal regulations. The policy calls for the definition of liquidity risk tolerance thresholds and a system of operational risk indicators in order to monitor the evolution of liquidity risk over time, as well as promptly identify the emergence of vulnerabilities in this area.

With regard to the corporate liquidity framework, the Basel III regulatory ratios as at 31 December 2024 at Group level were 274.1% and 174.4% for the *Liquidity Coverage Ratio* and *Net Stable Funding Ratio*, respectively. These values, a further improvement on the figures at the end of the previous year, are therefore well above the minimum values required by law.

The level and evolution over time of values correlated with the thresholds and indicators are constantly monitored by the Risks Control Function and brought to the attention of the Risks and ALM Committee which is responsible for overseeing their evolution over time.

As part of its dynamic management of operating liquidity, the Group has an internal procedure which, through a web interface, allows for the channelling of incoming and outgoing forecast flows from the Network and the Offices involved in the process, providing the Integrated Treasury Office with a crucial support tool for the accurate and punctual management of the daily level of liquidity, as well as the Compass procedure provided by the outsourcer Cedacri S.p.A. Furthermore, the management indicators include one which measures the available intraday liquidity. The net financial position (structural liquidity) surveillance system is enacted through the processing by the Integrated Risk Control Office of a Liquidity Report structured on the model of a maturity ladder, in order to evaluate the balance of expected cash flows within a 12-month timeframe. According to that model, assets and liabilities are mapped within each individual time band on the basis of the



1.4 LIQUIDITY RISK

relative date of maturity, understood as the date of the individual cash flows set forth in the contract, or of possible liquidation. The trend of the gaps accumulated on the various time bands allows for the monitoring of the current and outlook liquidity situation.

Alongside this verification, reports are also developed which contemplate sensitivity analyses; these analyses illustrate the evolution of the liquidity position following the occurrence of events of tension and crisis at specific or systemic level.

Strategic liquidity management constitutes an integral part of the three-year development plans prepared with the participation of all management functions.

The constraint of balanced growth in loan and deposit volumes, to also safeguard the Group's financial position, considered a strategic objective, continues to be adequately addressed in the guidelines relating to the Group's 2022-2024 Strategic Plan and in the Budgets of the individual Group Companies.

The effective achievement of the pre-established targets is periodically verified by the Parent Company's Planning Office through dedicated reports brought to the attention of the Top Management.

Alongside the liquidity position surveillance tools described above, as also laid out in the liquidity policy, the Group adopts risk mitigation tools, including the emergency plan (Contingency Funding and Recovery Plan). The CFRP establishes the strategies for counteracting liquidity deficits in emergency situations, and identifies the policies to be enacted in stress scenarios, indicating the responsibilities and the procedures to be followed.

The Group, aware of the central role of company liquidity management, is constantly committed in that regard with a view to further developing and refining the instruments currently used and, more generally, the entire company process of governing and managing liquidity risk, in line with the orientations seen internationally and with the provisions on the matter of liquidity dictated by prudential regulations.



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES 1.4 LIQUIDITY RISK

B. QUANTITATIVE INFORMATION

1. BREAKDOWN BY CONTRACTUAL RESIDUAL MATURITY OF FINANCIAL ASSETS AND LIABILITIES:	On demand	1 to 7 days	7 to 15 days	15 days to 1 month	1 to 3 months	3 to 6 months	6 months to 1 year	1 to 5 years	Over 5 years	Unspecified maturity
Currency: EURO										
Items/time										
A. Balance sheet assets	1,866,253	14,593	21,131	114,694	598,750	400,322	957,286	3,199,866	5,636,862	71,082
A.1 Government securities	0	0	0	600	11,024	18,799	318,237	340,000	2,225,000	0
A.2 Other debt securities	2,289	0	0	1,214	1,264	1,115	2,801	108,559	168,007	0
A.3 Units of UCITS	47,606	0	0	0	0	0	0	0	0	0
A.4 Loans	1,816,358	14,593	21,131	112,880	586,462	380,408	636,248	2,751,307	3,243,855	71,082
- Banks	1,332,170	135	0	75	216	0	0	889	0	66,578
- Customers	484,188	14,458	21,131	112,805	586,246	380,408	636,248	2,750,418	3,243,855	4,504
B. Balance sheet liabilities	6,694,713	1,475	60,116	39,597	159,368	448,849	515,971	2,765,556	705,363	0
B.1 Deposits and current accounts	6,643,330	1,430	1,371	33,302	71,235	57,487	272,650	907,087	0	0
- Banks	8,522	0	0	0	0	0	0	0	0	0
- Customers	6,634,808	1,430	1,371	33,302	71,235	57,487	272,650	907,087	0	0
B.2 Debt securities	188	45	58,745	359	30,265	184,144	87,949	586,239	94,199	0
B.3 Other liabilities	51,195	0	0	5,936	57,868	207,218	155,372	1,272,230	611,164	0
C. Off-balance sheet transactions										
C.1 Physically settled fin. derivatives										
- Long positions	0	912	43	220	0	0	0	1,018	20	0
- Short positions	0	1,305	0	0	0	50	0	0	0	0
C.2 Cash settled fin. derivatives										
- Long positions	0	0	0	374	2,598	3,425	3,084	0	0	0
- Short positions	29	0	0	584	506	1,903	8,570	0	0	0
C.3 Deposits and loans to be settled										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0
C.4 Irrevocable commitments to disburse funds										
- Long positions	11	0	0	31	0	0	61	4,689	109,173	0
- Short positions	113,964	0	0	0	0	0	0	0	0	0
C.5 Financial guarantees given	1	0	0	1	2	0	0	0	0	0
C.6 Financial guarantees received	0	0	0	0	0	0	0	0	0	0
C.7 Equity settled cred. derivatives										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0
C.8 Cash settled cred. derivatives										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0



**PART E
INFORMATION ON
RISKS AND
RELATIVE HEDGING
POLICIES**

1.4 LIQUIDITY RISK

1. BREAKDOWN BY CONTRACTUAL RESIDUAL MATURITY OF FINANCIAL ASSETS AND LIABILITIES: Currency: OTHER CURRENCIES Items/time	On demand	1 to 7 days	7 to 15 days	15 days to 1 month	1 to 3 months	3 to 6 months	6 months to 1 year	1 to 5 years	Over 5 years	Unspecified maturity
A. Balance sheet assets	16,693	0	259	298	2,279	1,147	100	736	2,469	0
A.1 Government securities	0	0	0	0	0	0	0	0	0	0
A.2 Other debt securities	0	0	0	0	0	0	0	0	0	0
A.3 Units of UCITS	0	0	0	0	0	0	0	0	0	0
A.4 Loans	16,693	0	259	298	2,279	1,147	100	736	2,469	0
- Banks	15,419	0	0	0	0	0	0	0	0	0
- Customers	1,274	0	259	298	2,279	1,147	100	736	2,469	0
B. Balance sheet liabilities	21,048	0	0	0	0	0	0	0	0	0
B.1 Deposits and current accounts	21,048	0	0	0	0	0	0	0	0	0
- Banks	0	0	0	0	0	0	0	0	0	0
- Customers	21,048	0	0	0	0	0	0	0	0	0
B.2 Debt securities	0	0	0	0	0	0	0	0	0	0
B.3 Other liabilities	0	0	0	0	0	0	0	0	0	0
C. Off-balance sheet transactions										
C.1 Physically settled fin. derivatives										
- Long positions	0	269	0	0	0	0	0	0	0	0
- Short positions	0	861	42	221	0	0	0	0	0	0
C.2 Cash settled fin. derivatives										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0
C.3 Deposits and loans to be settled										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0
C.4 Irrevocable commitments to disburse funds										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0
C.5 Financial guarantees given	0	0	0	0	0	0	0	0	0	0
C.6 Financial guarantees received	0	0	0	0	0	0	0	0	0	0
C.7 Equity settled cred. derivatives										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0
C.8 Cash settled cred. derivatives										
- Long positions	0	0	0	0	0	0	0	0	0	0
- Short positions	0	0	0	0	0	0	0	0	0	0



INFORMATION RELATING TO THE EIGHTH MULTI-ORIGINATOR SECURITISATION TRANSACTION

On 15 March 2017, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. carried out the second multi-originator securitisation transaction, with the special purpose vehicle Asti Group PMI S.r.l., with registered office in Rome, via Curtatone no. 3, registered in the List of special purpose vehicles established pursuant to Article 4 of the Measure issued by the Bank of Italy on 29/04/2011 at no. 33533.O.

The transaction has a revolving structure, which entails the issue by the SPV of notes with defined amounts and maturities against a portfolio of assets with variable amounts and maturities. This structure includes two distinct periods: the revolving period, during which the subscribers of notes receive a series of cash flows by way of interest, while the principal repayments attributable to them are used by the vehicle to acquire new loans with analogous characteristics, in order to maintain a constant level of assets to support investors, and the amortisation period, during which the loan interest flows continue to be used for the payment of interest on the bonds and operating expenses; the principal attributable to investors is used to repay the notes.

The transaction took place through the non-recourse transfer to the SPV of variable, fixed, option and bullet commercial, unsecured and mortgage loans and loans with “greater guarantee” mortgage, belonging to the “performing” and unsubsidised category, held by sole proprietorships, companies or natural persons with professional activity or natural persons connected to companies, for an initial total of € 1,185,339 thousand (of which € 856,772 thousand of Cassa di Risparmio di Asti S.p.A. and € 328,567 thousand of Biverbanca S.p.A.). The loans were transferred at their carrying amount.

On 13 March 2020, Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. repurchased € 30,307 thousand in bad loans from the special purpose vehicle Asti Group PMI S.r.l.

Against the loans transferred, notes were issued for € 1,185,339 thousand, repurchased in full by the originators Cassa di Risparmio di Asti S.p.A. and Biverbanca S.p.A. The amount was settled on 15/03/2017 through offsetting with the transferred loans. On the notes issued by the SPV, the established repayment plan has been determined on the basis of the amortisation of the transferred loans and the conditions set forth in the Offering Circular.

The general aim of the securitisation transactions is to diversify the sources of funds and/or funding pools.

The eighth securitisation is a “self-securitisation” transaction: the relative notes, issued and not sold to institutional investors, but directly repurchased by the multi-originator Banks, are financial instruments usable as collateral in refinancing transactions with the European Central Bank and provide the Banks with a liquidity reserve available for short-term ordinary operations and to handle temporary unexpected financial needs, which could arise from cash flow imbalances or the current situation in the financial markets.



1.4 LIQUIDITY RISK

Type of Note	Rating as at 31/12/2024 Moody's/DBRS	Rate	Date of issue	Expected maturity date	Total amount issued	Total amount repaid as at 31/12/2024	Total residual value as at 31/12/2024	Notes repurchased and owned by Banca di Asti as at 31/12/2024 (nominal value)
Class A	Aa3/AA	3M Euribor + 0.75%	15/3/2017	29/10/2092	700,000	0	700,000	700,000
Class B	no rating	3M Euribor + 1.50%	15/3/2017	29/10/2092	485,339	0	485,339	485,339
Total					1,185,339	0	1,185,339	1,185,339

Like the other transactions, also in the eighth securitisation, a loan with limited enforceability was disbursed for € 31,850 thousand (€ 23,027 thousand by Cassa di Risparmio di Asti S.p.A. and € 8,823 thousand by Biverbanca S.p.A.), crediting the following amounts to the SPV:

- € 14,000 thousand for the Cash Reserve, broken down as follows: € 10,122 thousand for Banca di Asti and € 3,878 thousand for Biverbanca;
- € 17,800 thousand for the cash reserve called the Set-off Reserve, broken down as follows: € 12,869 thousand for Banca di Asti and € 4,931 thousand for Biverbanca;
- € 50 thousand for the provision for operating expenses, broken down as follows: € 36 thousand for Banca di Asti and € 14 thousand for Biverbanca.

The SPV also holds an additional cash reserve of € 3,500 thousand on the cash reserve account. The full repayment of the cash reserve and the provision for expenses will take place based on available financial resources at the time of full repayment of the notes. For this securitisation transaction, there is no rate hedging through swap transactions. The SPV determines the excess spread on a quarterly basis, which is equal to the algebraic sum of interest income relating to loans collected during the period less, in order of priority, tax charges, vehicle management costs and interest expense relating to the bond loans paid during the same period. The excess spread (additional remuneration on B class notes) will be paid in full by the SPV to the originators, based on available financial resources, when the notes are repaid; as at 31/12/2024 it amounted to € 65,128 thousand for Cassa di Risparmio di Asti S.p.A.

As at 31/12/2024, the Bank essentially retains the credit risk connected to the securitised loans, which the Bank continues to value by recognising in dedicated provisions the estimated loss in value, aside from the counterparty risk relating to the cash reserves and the provision for expenses disbursed to the vehicle and the excess spread to be collected.

The securitised loan assets were recognised in these financial statements under the item "Loans and advances to customers" in the amount of € 1,095,527 thousand.

The financial liabilities for securitised loans are recognised in "Deposits from customers" in an equal amount.

The securitisation income and expenses recognised in these financial statements are as follows:



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES 1.4 LIQUIDITY RISK

Income		Expenses	
interest income generated by securitised assets	62,992	interest expense on notes issued	57,567
bank interest income	2,914	servicing fee expense	1,120
other revenues	983	other expenses	255
		losses on loans	90
Total	66,889	Total	59,032

The valuation of the securitised loans at their estimated realisable value entailed the recognition of € 17,382 thousand in overall value adjustments on the principal.

Interest income on repurchased notes, amounting to € 57,567 thousand, was fully allocated against a reduction in interest expense on the notes issued.

INFORMATION RELATING TO THE MANU SECURITISATION TRANSACTION

On 26 February 2018, the company entered into a non-recourse monthly loan transfer agreement with the special purpose vehicle Manu SPV S.r.l., as part of a securitisation transaction without derecognition, for a total maximum value of € 250 million, with a 24-month ramp-up period.

The loan transfers took place through the payment of an acquisition price “at par”, with the subsequent valuation of the loans following the relative business model defined.

The acquisition price of each loan portfolio, plus the cash reserve, is financed through the issue of notes, with a “partly paid” structure, broken down into three classes:

- 83.2% “Senior” Notes (Class A Asset Backed);
- 7.9% “Mezzanine” Notes (Class B Asset Backed);
- 8.9% “Junior” Notes (Class J Asset Backed).

At the issue date, the Senior notes were subscribed by “Duomo Funding PLC” (company established under Irish law and “Conduit” platform of the “Intesa Sanpaolo” Group), while the Mezzanine and Junior notes were entirely subscribed by Pitagora.

The Ramp-up period was subsequently extended to 27 June 2021 for a total maximum value of € 300 million.

In June 2021, a further contractual amendment was signed in order to extend the ramp-up period for a further 12 months, until June 2022.

In June 2022, a further contractual amendment was signed in order to extend the ramp-up period for a further 12 months, until June 2023 and to increase the size of the securities issued up to the following nominal amounts:

- “Senior” Notes (Class A Asset Backed): € 330,000,000
- “Mezzanine” Notes (Class B Asset Backed): € 32,700,000



1.4 LIQUIDITY RISK

- “Junior” Notes (Class C Asset Backed): € 36,800,000

In December 2022, a further contractual amendment was signed in order to include the transfer option also of the TFS receivables (post-employment benefits).

In June 2023, the ramp-up period of the transaction ended, therefore, no more incremental transfers are planned.

At that date, the value of the securities was as follows:

- “Senior” Notes (Class A Asset Backed); € 281,977,685.32
- “Mezzanine” Notes (Class B Asset Backed): € 27,961,635.66
- “Junior” Notes (Class C Asset Backed): € 31,476,840.14

In December 2023 (18/12/2023), a further contractual amendment was signed for the activation of a SWAP CAP at 5% to hedge the interest rate risk of the Senior Notes.

At the "payment date" of 27/12/2024, the outstanding value of the securities was as follows:

- Senior Notes: € 162,950,336.72
- Mezzanine Notes: € 27,961,635.66
- Junior Notes: € 31,476,840.14.

The Senior Notes of the transaction provide a variable return to the investor of € 1 million to which a fixed spread of 0.95% is added. The Mezzanine Notes provide a fixed return of 3% while the Junior Notes receive any exceed spread.



QUALITATIVE INFORMATION

A. General aspects, management procedures and measurement methods for operational risk

Operational risk is defined as the risk of suffering from losses deriving from inadequacies, malfunctioning or gaps in internal processes, human resources or systems, or due to external events. This risk encompasses “legal risk” (risk resulting from infringements or from failure to comply with laws or regulations, or poor transparency as regards the legal rights and duties of the counterparties to a transaction) and “conduct risk” (risk of losses due to the inappropriate offer of financial services and the related legal costs, including cases of conduct that are intentionally inadequate or negligent). This risk also includes, inter alia, exposure to fines, financial sanctions or penalties deriving from measures taken by the Supervisory Authority, or private settlements.

The Internal Control System constitutes a fundamental element of the overall Group governance system, which has as its objective that of guaranteeing that company operations are inspired by principles of sound and prudent management and that they are aligned with approved strategies, the policies adopted and the risk appetite. In recent years, consistent with the guidelines contained in the Strategic Plan and in the other planning documents, the Group has developed various activities to mitigate operational risk, which have made it possible to a) increase the effectiveness and degree of coverage of first-level controls to mitigate operational risks, introducing a system for monitoring them, b) define an organisational model for operational risk control.

Over the years, also through specific organisational projects, the Internal Control System was gradually implemented to integrate within it the principles introduced with the 11th update of Bank of Italy Circular 285/2013 and, more specifically, with a view to developing, formalising within Group Policies and fully implementing an integrated methodology for the assessment of operational, non-compliance and reputational risks; this assessment is performed in terms of Potential Risk (i.e., assuming the absence of controls) and in terms of Residual Risk (i.e., taking into account existing controls and their concrete functioning).

The organisational model adopted provides for active and systematic interaction between the Operational Risk, IT Risk and Data Quality Office and the Organisational Units of the Central Structure and the Sales Network, in particular through the periodic performance of Risk Self-Assessment and monitoring on the execution of controls activities; this interaction is intended to update the Risk and Control Map, continuously refine existing controls, ensure their greater effectiveness and, at the same time, improve the efficiency of company processes.

The Operational Risk, IT Risk and Data Quality Office also periodically performs monitoring on specific areas as well as verifications on the accurate and precise performance by the Organisational Structures of the first-level controls established; this takes place through specific questionnaires which the Structures are called upon to complete. The information obtained in this manner contributes, within the assessment methodology, to the proper determination of residual risk values.


1.5 OPERATIONAL RISKS

The activity aimed at strengthening remote controls works closely with what was described above. In order to identify anomalous phenomena or potential areas of risk, the Internal Audit Function has set up an IT system which extracts data from company archives, processes them and aggregates them by individual party or reference relationship and assigns a risk assessment on a quantitative scale through the attribution of a score. The intent is to focus attention on anomaly indicators and intervene with corrective measures before the situation of potential risk can be aggravated and give rise to operational losses.

In parallel, on a half-yearly basis, the Operational Risk, IT Risk and Data Quality Office surveys and analyses the data of operational losses incurred, which are used as input for an internal database structured on the basis of the DIPO (Italian Database of Operational Losses) layout.

The duties of identifying and reporting losses are assigned to the Managers of the central structure organisational structures which, based on their responsibilities and organisational roles, have the information required to update the database; the Operational Risk, IT Risk and Data Quality Office analyses the evidence collected, classifies it and checks for its correspondence with the accounting results.

The final output of this activity consists of the periodic compilation of a matrix in which the gross and net actual losses identified during the period under examination are classified on the basis of the relative type of generating event, the original time period and the company process in which they emerged.

An additional operational risk mitigation tool is represented by the Business Continuity Plan which is annually updated in line with the provisions of regulations in force on the matter.

Business continuity refers to the set of all initiatives aimed at containing, within a range deemed acceptable, the damages ensuing from any accidents and catastrophes that may directly or indirectly strike the company.

The management of Business Continuity is broken down into two phases: the first consists of carrying out the Business Impact Analysis (B.I.A.) in line with the methodology proposed by AbiLab, the objective of which is to identify the level of criticality of processes with a view to business continuity; the second phase regards drafting the Business Continuity Plan.

The Disaster Recovery Plan is an integral part of the Business Continuity Plan, and establishes the technical and organisational measures aiming to handle events which could lead to the unavailability of data processing centres, in order to allow for the functioning of significant IT procedures at alternative sites.

Further operational risk mitigation is performed through insurance coverage taken out from major Insurance Companies.

The policies taken out provide adequate coverage in terms of third-party liability and with respect to service providers, as well as on damages to infrastructure that is owned, under lease or in use, in addition to the information technologies.



QUANTITATIVE INFORMATION

With respect to the sources in which operational risk arises, the percentage breakdown of the losses is described below by type of event, according to the Supervisory Authority classification:

- internal fraud: losses owing to unauthorised activity, fraud, embezzlement or violation of laws, regulations or business directives that involve at least one internal member of staff;
- external fraud: losses due to fraud, embezzlement or violation of laws by external parties;
- employment relationship and occupational safety: losses arising from actions in breach of employment, occupational health and safety laws or agreements, payment of compensation as indemnities for personal injury or episodes of discrimination or failure to apply equal treatment;
- customers, products and professional practices: losses arising from non-fulfilment of professional obligations to customers or from the nature or characteristics of the product or service provided;
- damage resulting from external events: losses arising from events such as natural disasters, acts of terrorism and vandalism as well as changes in case law with retroactive effect;
- interruption of operations and malfunctioning of systems: losses due to business disruption or system failures and disruptions;
- process execution, delivery and management: losses arising from operational and process management shortfalls, as well from transactions with business counterparties, vendors and suppliers.

The analysis was performed with reference to operating events that entailed losses in gross amounts of at least € 1,000.

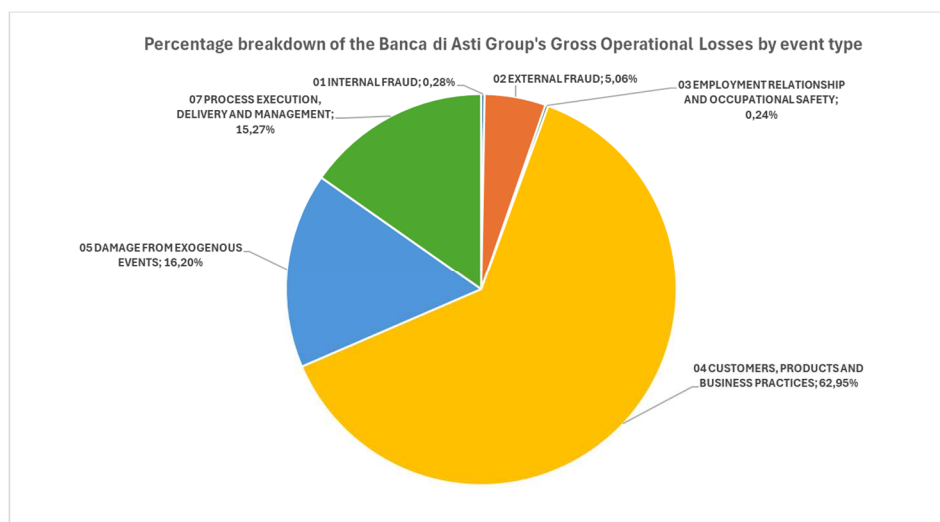
Starting from 2015, with the aim of producing a timelier and more accrual-based report, the analysis takes into account not only the operating losses that have caused cash outflows during the year, but also loss estimates and provisions, as well as recovery estimates.

The collection of Operational losses in Pitagora and We Finance is performed on the basis of the methodology adopted by the Parent Company, obviously keeping in mind the specific nature of the Companies' business model and its organisational structure.

From the breakdown of the losses recorded during 2024, it can be seen that the Event Type classes where the operational loss events are concentrated are the class "04 Customers, Products and Business Practices" which mainly includes provisions for amounts potentially to be returned to customers in relation to analyses carried out in accordance with regulations on certain products/services, and class "07 Execution, delivery and process management" which mainly includes amounts spent in relation to contractual disputes concerning the disposal of impaired loans.



1.5 OPERATIONAL RISKS



Operating risk performance is subject to continuous monitoring with a view to perfecting the organisational oversight and controls, so as to effectively contain these risks, already arisen or potential.

Prevention and Protection Service

The Prevention and Protection Service, in conjunction with the Technical Office, continued activities in 2024 aimed at adopting information, organisational, prevention and protection measures to ensure the protection of human health, security and the environment.

Meetings have been held, including via remote connection, with Workers' Representatives and Company Physicians, in order to analyse and share the actions to be taken and to verify the effectiveness of those implemented.

During the year, the Prevention and Protection Service continued its revision and updating of the Risk Assessment Documents, already previously developed for the Agencies, Branches and the Head Office, in compliance with the requirements of Italian Legislative Decree 81/2008 as amended.

During the year 2024, inspections were carried out at the offices of the central offices of Asti and Biella and in 32 branches: Alessandria, Aosta, Asti Ag. 2, Biella Ag. 2, Biella Ag. 3, Biella Ag. 4, Biella Ag. 8, Brusnengo, Caluso, Cambiano, Candelo, Castello di Annone, Cerrina Monferrato, Chivasso, Cocconato, Cossato, Genoa, Ivrea, Lauriano, Masserano, Novara, Novi Ligure, Quarto, Quattordio, Robella, Rocchetta Tanaro, Saint Vincent, Trecate, Valdengo, Valenza, Vercelli Ag. 6, Villanova D'Asti.

The Prevention and Protection Service, after carrying out the inspections, has prepared the minutes of the inspection reports and updated the Risk Assessment Documents (DVR).

All the inspections were attended by the Company Physician, one or more of the Workers' Safety Representatives, the staff of the company ELA S.r.l., together with



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES **1.5 OPERATIONAL RISKS**

staff in charge for the Prevention and Protection Service, in order to make monitoring as complete and effective as possible.

During 2024, eight injuries to personnel were recorded, broken down as follows: three caused by accidental falls, three during normal work activities and two identified as "while travelling" accidents on the journey from home to work.

As regards the cases of "Accidents while travelling", a copy of the relevant information has been provided.

With regard to other accidents, the investigations verified that they were not associated with or attributable to structural deficiencies or inadequate organisation of work activities.

With regard to the risk of theft and robbery, it should be noted that no robberies were recorded during the year, with only one attempted robbery at the Cerrina branch.

With reference to thefts, these refer to:

- a case of pickpocketing (Agenzia di Città no. 8 di Asti).
- 4 successful thefts at ATM (Saluggia, Settimo Torinese, Moncalvo and Strambino);
- 6 attempted thefts at ATM (Sandigliano, Crescentino, Robella and Buronzo and two attempts in Orbassano).

The table below indicates the criminal events experienced in recent years:

EVENT	2020	2021	2022	2023	2024
Robberies	0	1	0	0	0
Attempted robberies	1	0	4	0	1
Thefts	1	0	0	1	5
Attempted thefts	9	5	7	4	6

In relation to the above, in the current year, the working group of Ms. Converso of the University of Turin did not hold any meetings to analyse the psychological effects of exposure to robbery.

As regards training activity, the data provided by the Human Resources Development Office regarding training delivered in 2024 are broken down as follows:



1.5 OPERATIONAL RISKS

TITLE OF TRAINING ACTIVITIES	No. PARTICIPANTS	TOTAL HOURS PROVIDED
SECURITY UPDATE - TECHNICAL RISK MODULE (FAD)	47	94
FIRE SAFETY - LEVEL 2 SUITABILITY EXAM PREPARATION	8	48
FIRE-FIGHTING MEDIUM RISK - ENABLING	18	154
PROPER WASTE MANAGEMENT	111	56
REFRESHER COURSE FOR ASPP (Prevention and Protection Service Officer) – RSPP (Head of the Prevention and Protection Service)	6	30
BASIC COURSE BLS-D USING AED	1	4
REFRESHER COURSE ON THE USE OF BLSD-AED	3	19
TRAINING COURSE ON HEALTH AND SAFETY	12	48
ITALIAN LEGISLATIVE DECREE 81/08 - FIRST AID – QUALIFICATION	67	819
ITALIAN LEGISLATIVE DECREE 81/08 FORKLIFT OPERATORS COURSE	2	8
BASIC WORKER TRAINING - NEW HIRES	38	51
MANAGING EMERGENCIES AND BEING AWARE OF NEW RISKS (REMOTE LEARNING)	32	80
SYSTEMIC WASTE MANAGEMENT IN THE BANK: REGULATORY COMPLIANCE, 231 OFFENCES AND GOOD PRACTICE	18	63
GUIDELINES OF THE MANAGEMENT SYSTEM FOR HEALTH, SAFETY AND ENVIRONMENT IN THE WORKPLACE	111	55
PREVENTION MEASURES FOR THE RISK OF ROBBERY	18	46
FIRST AID - UPDATE	46	184
RLS - ANNUAL UPDATE	4	32
HEALTH AND SAFETY - BASIC WORKER TRAINING	23	50
HEALTH AND SAFETY - ROBBERY RISK (SPECIFIC RISK)	11	31
HEALTH AND SAFETY - SPECIFIC RISK	11	44
HEALTH AND SAFETY IN THE WORKPLACE: (ITALIAN LEGISLATIVE DECREE 81/08) SUPERVISOR TRAINING	16	140
HEALTH AND SAFETY IN THE WORKPLACE: FIRE-FIGHTING LOW RISK - ENABLING	37	148
HEALTH AND SAFETY IN THE WORKPLACE - FIRE-FIGHTING LOW RISK - UPDATE	24	48
HEALTH AND SAFETY IN THE WORKPLACE - LOW RISK SPECIFIC TRAINING (REMOTE LEARNING)	53	212
SECURITY IN THE BANK - STRATEGIES AND RESPONSIBILITIES OF MANAGERS	4	35
HEALTH AND SAFETY IN THE WORKPLACE - LOW RISK FIRE SAFETY - UPDATE	10	20
INTEGRATED HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM	23	12
CONSOLIDATED SAFETY ACT (REMOTE LEARNING)	28	112
Overall Total	782	2,643



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES **1.5 OPERATIONAL RISKS**

TITLE OF TRAINING ACTIVITIES	No. PARTICIPANTS	TOTAL HOURS PROVIDED
A JOURNEY INTO SUSTAINABILITY: THE MAP FOR ORIENTING THE WORLD OF ESG IN THE BANK	81	162
AGE DIVERSITY	71	36
DIVERSITY MANAGEMENT	54	27
RESPONSIBLE COMMUNICATION	38	19
PARENTING AS AN OPPORTUNITY	32	16
GENDER HARASSMENT IN THE WORKPLACE	226	226
REVERSE MENTORING	30	15
WORK-RELATED STRESS	32	16
DYNAMICALLY DEVELOPING GENDER INCLUSION	45	23
DEVELOPING A WORKING CULTURE THAT INCLUDES DIVERSITY VALUES AND SOCIAL RESPONSIBILITY	33	17
	54	54
AGENDA 2030: OBJECTIVE 12 - RESPONSIBLE CONSUMPTION AND PRODUCTION	215	108
AGENDA 2030: OBJECTIVE 13 - FIGHT AGAINST CLIMATE CHANGE	207	104
ITALIAN LEGISLATIVE DECREE 231 AND WHISTLEBLOWING	103	103
WHISTLEBLOWING: FROM ITALIAN LEGISLATIVE DECREE 24/2023 TO THE APPLICATION IN BANCA D'ASTI TO THE ANAC GUIDELINES	370	740
CSRD AND EFRAG STANDARDS: FUNDAMENTAL STEPS, ELEMENTS AND OPPORTUNITIES OF THE NEW SUSTAINABILITY DISCLOSURE	1	45
BECOME CLIMATE & ENVIRONMENTAL RISK EXPERT	1	30
EVOLUTION OF THE LOAN PORTFOLIO: HOW TO BUILD ESG CREDIT PRODUCTS	8	96
HATE SPEECH: WHAT IT IS, HOW WIDE IT IS, WHAT ARE THE IMPACTS ON SOCIETY	1	10
THE ESG WEEK: THE SUSTAINABLE TRANSFORMATION BETWEEN COMPLEXITY AND VALUE	1	33
THE INTEGRATION OF ESG FACTORS IN THE PLANNING AND MANAGEMENT CONTROL	1	12
ESG WORKSHOP 2024	19	32
WORKSHOP ON EMOTIONAL INTELLIGENCE	130	390
WORK-LIFE BALANCE	26	133
A JOURNEY INTO SUSTAINABILITY: THE MAP FOR ORIENTING THE WORLD OF ESG IN THE BANK	81	162
AGE DIVERSITY	71	36
DIVERSITY MANAGEMENT	54	27
RESPONSIBLE COMMUNICATION	38	19
Overall Total	1,779	2,447

In conclusion, it should be noted that the activities of the Prevention and Protection Service are also aimed at the continuous improvement of the "Management System for Health and Safety in the Workplace", a certification according to the UNI EN ISO 45001:2023 standard (obtained in December 2022) and the 'Environmental Management System', a certification according to the UNI EN ISO 14001:2015 standard (obtained in January 2024). In this regard, it is reported that both certifications were confirmed on 11 December 2024.

Lastly, it should be noted that the certification of the Occupational Health, Safety and Environment Management System is due for renewal in the autumn of 2025.



1.5 OPERATIONAL RISKS

Italian Legislative Decree 231/2001**Regulations on the administrative liability of legal entities**

The functions of the Supervisory Body established pursuant to Italian Legislative Decree 231/2001 are assigned to the Board of Statutory Auditors, in compliance with the provisions of Article 6 of Italian Legislative Decree 231/2001 as well as the Prudential Supervision Regulations of the Bank of Italy (Circular 285/13 - Title IV - Chapter 3).

In 2024, the Supervisory Board continued the in-depth study and review, through the analysis of the periodic reports that the Heads of the various Corporate Functions are required to submit pursuant to the Regulation on Information Flows, of the organisational safeguards for the prevention of offences relating to the areas falling within the scope of the legislation. Specific controls were also put into place concerning certain risk areas, as well as follow-up controls on the results of audits from the previous year. In performing these activities, the “231/2001 Risk-offence mapping”, an integral part of the Organisational Model - Special Part, has been particularly useful as it makes it possible to contextualise the protocols defined by the Bank within company operations, in order to have overall tracking available of the risks of offences that impact the business organisation. No critical issues worthy of note emerged from the overall activities performed.

IT Risks and European Regulation 2016/679 (GDPR)

The Bank information system is based on an operating platform provided and managed by the outsourcer Cedacri S.p.A., which is capable of guaranteeing the security, quality and reliability required for all services used by the Bank. The accuracy of the description of the outsourcer's control environment, the adequacy of the control design and the operating effectiveness of the controls themselves are periodically audited by independent auditors according to the procedures set forth in the “ISAE” 3402 - Type II International Standard.

The installation and management of other application solutions is managed and supervised directly by the Parent Company's ICT Function, in collaboration with the individual Organisational Units.

The security levels of the information system under the direct responsibility of the Bank as well as the procedures and data processed are constantly updated in light of the evolution of technological knowledge acquired and changes in potential operational risks. All personnel are constantly updated on the evolution of regulations, risk conditions and the behaviour to be adopted to prevent harmful events.

As at 31/12/2024, the annual IT risk assessment was in progress with reference to all components of the information system, taking into consideration those managed by the outsourcer, the infrastructural services provided by the ICT Function and the applications created internally and purchased from third parties, in order to measure the level of potential risk, the adequacy of the counter-measures adopted and the subsequent residual risk. The monitoring conducted during the period on the



PART E
INFORMATION ON
RISKS AND RELATIVE
HEDGING
POLICIES 1.5 OPERATIONAL RISKS

components of the information system did not reveal any critical issues with respect to the effectiveness of the counter-measures in place.

Personal data processing is carried out in compliance with reference regulations, with a particular focus on the principles of “privacy by design” and “privacy by default” and the instructions issued by the Privacy Authority over time. In compliance with the measure of the Privacy Authority of 27/11/2008 as amended, precise oversight is maintained of 'System Administrators' and with reference to Resolution of the Privacy Authority of 12 May 2011 and subsequent implementing provisions (Privacy Authority II), the monitoring of the enquiries made by the Bank's staff continued. On the same point, periodic monitoring was set up by the Privacy Function relating to new applications - outside the Cedacri environment - that are released and which, if they contain banking information, will be included in the Cedacri DB.



SECTION 1 – CONSOLIDATED SHAREHOLDERS' EQUITY

A. QUALITATIVE INFORMATION

The Group periodically evaluates the adequacy of its capital, understood as the aggregate consisting of share capital and reserves as well as total Own Funds, to support current and future activities, and compares the latter with prudential requirements, constantly monitoring surpluses.

B. QUANTITATIVE INFORMATION

The Group's shareholders' equity amounted to € 1,149,591 as at 31 December 2024, inclusive of profit for the year. The shareholders' equity values relating to Other companies refer to the special purpose securitisation vehicles and the investment in Edera S.r.l. and Fa.Ro. S.r.l. by Pitagora S.p.A., valued within the scope of consolidation using the shareholders' equity method.

The Group's total Own Funds, which under the previous regulations constituted Regulatory Capital, amounted to € 999,062 thousand.

B.1 CONSOLIDATED SHAREHOLDERS' EQUITY: BREAKDOWN BY TYPE OF BUSINESS	Prudential consolidation	Insurance companies	Other companies	Consolidation adjustments and eliminations	Total
Items of shareholders' equity					
1. Share capital	383,966	0	70	0	384,036
2. Share Premium Reserve	336,135	0	0	0	336,135
3. Reserves	314,632	0	-72	0	314,560
4. Equity instruments	97,567	0	0	0	97,567
5. (Treasury shares)	-3,031	0	0	0	-3,031
6. Valuation reserves:	-30,905	0	0	0	-30,905
- Equity securities designated at fair value through other comprehensive income	111	0	0	0	111
- Hedging of equity securities designated at fair value through other comprehensive income	0	0	0	0	0
- Financial assets (other than equity securities) measured at fair value through other comprehensive income	-27,046	0	0	0	-27,046
- Property, plant and equipment	0	0	0	0	0
- Intangible assets	0	0	0	0	0
- Foreign investments hedging	0	0	0	0	0
- Cash flow hedging	-2,920	0	0	0	-2,920
- Hedging instruments [non-designated items]	0	0	0	0	0
- Foreign exchange differences	0	0	0	0	0
- Non-current assets held for sale and discontinued operations	0	0	0	0	0
- Financial liabilities designated at fair value through profit or loss (own creditworthiness changes)	3	0	0	0	3
- Actuarial gains (losses) on defined benefit pension plans	-1,053	0	0	0	-1,053
- Portion of valuation reserves from investments carried at equity	0	0	0	0	0
- Special revaluation laws	0	0	0	0	0
7. Profit (Loss) for the year (+/-) attributable to the group and minority interests	51,229	0	0	0	51,229
Shareholders' equity	1,149,593	0	-2	0	1,149,591



PART F
INFORMATION
ON CONSOLIDATED
SHAREHOLDERS' EQUITY **SECTION 1 – CONSOLIDATED SHAREHOLDERS' EQUITY**

B.2 VALUATION RESERVES FOR FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME: BREAKDOWN	Prudential consolidation		Insurance companies		Other companies		Consolidation adjustments and eliminations		Total	
	Positive reserve	Negative reserve	Positive reserve	Negative reserve	Positive reserve	Negative reserve	Positive reserve	Negative reserve	Positive reserve	Negative reserve
Asset/amounts										
1. Debt securities	94	27,589	0	0	0	0	0	0	94	27,589
2. Equity securities	115	4	0	0	0	0	0	0	115	4
3. Loans	449	0	0	0	0	0	0	0	449	0
Total 2024	658	27,593	0	0	0	0	0	0	658	27,593

The breakdown of item 1. Debt securities is provided below, relating to securities of European Union countries.

	Total 2024	EU Issuer	
		Italy	Other European countries
Positive reserve	94	0	94
of which: debt securities of EU countries	0	0	0
of which: other debt securities	94	0	94
Negative reserve	27,589	17,560	10,029
of which: debt securities of EU countries	27,589	17,560	10,029
of which: other debt securities	0	0	0

B.3 VALUATION RESERVES FOR FINANCIAL ASSETS MEASURED AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME: ANNUAL CHANGES	Debt securities	Equity securities	Loans
1. Opening balance	-33,759	13	853
2. Positive changes	31,199	98	0
2.1 Fair value increases	31,189	98	0
2.2 Value adjustments for credit risk	10	X	0
2.3 Reversal to income statement of negative reserves from disposals	0	X	0
2.4 Transfers to other components of shareholders' equity (equity securities)	0	0	0
2.5 Other changes	0	0	0
3. Negative changes	24,935	0	404
3.1 Fair value decreases	24,935	0	404
3.2 Recoveries for credit risk	0	0	0
3.3 Reversal to income statement from positive reserves: realised	0	X	0
3.4 Transfers to other components of shareholders' equity (equity securities)	0	0	0
3.5 Other changes	0	0	0
4. Closing balance	-27,495	111	449



SECTION 1 – CONSOLIDATED SHAREHOLDERS' EQUITY

B.4 VALUATION RESERVES FOR DEFINED BENEFIT PLANS: ANNUAL CHANGES	Provision for employee severance pay	Company pension fund	Non-compete agreement
Actuarial gains (losses)			
1. Opening balance	-902	0	-153
2. Positive changes	0	0	47
2.1 Actuarial gains	0	0	47
2.2 Other changes	0	0	0
3. Negative changes	45	0	0
3.1 Actuarial losses	45	0	0
3.2 Other changes	0	0	0
4. Closing balance	-947	0	-106



PART F
INFORMATION
ON CONSOLIDATED
SHAREHOLDERS' EQUITY **SECTION 2 – OWN FUNDS AND BANK CAPITAL RATIOS**

As set forth in the 8th update of Circular 262 “Bank financial statements: layouts and rules for preparation”, as amended, please refer to the disclosure on Own Funds and capital adequacy contained in the Group’s Third Pillar Public Disclosure, published in the section “*Investor Relations*” on the site www.bancadiasti.it.



PART G - BUSINESS COMBINATIONS CONCERNING COMPANIES OR BUSINESS BRANCHES

Section 1 - Business combinations during the year

This case is not present since no business combinations were carried out in 2024.

Section 2 - Business combinations after the end of the year

This case is not present since no business combinations were carried out after the end of the 2024 financial year.

Section 3 - Retrospective adjustments

During the year, no adjustments were made in relation to business combinations carried out in previous years.



**PART H
RELATED PARTY
TRANSACTIONS**

PART H – RELATED PARTY TRANSACTIONS

In compliance with the international accounting standard IAS 24, in addition to the disclosure on related-party transactions, a summary is provided of the compensation received during the year by directors, statutory auditors and executives.

1. Information on compensation of key management personnel

	4,783
a) short-term benefits for employees and directors	3,838
b) post-employment benefits	196
c) other long-term benefits	405
d) termination indemnities	0
e) share-based payments	0
other compensation	344
Item f) refers to the compensation of the Board of Statutory Auditors.	

2. Information on related party transactions

In implementation of CONSOB Regulation 17221 of 12 March 2010, as updated by Consob Resolution 22144 in force as at 31 December 2021, and Part III, Chapter 11 of the Supervisory Provisions for Banks (Bank of Italy Circular 285 of 17 December 2013, as amended), the Board of Directors approved the "Regulations for Related Party and Associated Party Transactions".

Related parties are as follows:

- all parties that directly or indirectly, even through Subsidiaries, trust companies or third parties:
 - a. control the Group, are controlled by it, or are controlled by the same party/ies that control the Group;
 - b. hold an equity investment in the Group that makes it possible for them to exercise a Significant Influence;
 - c. exercise control over the Bank together with other parties.
- the Associated Companies of the Group;
- the Joint Ventures the Group is a party to;
- Key Management Personnel of the Group and of Fondazione Cassa di Risparmio di Asti, or:
 - a) the members of the Board of Directors
 - b) the members of the Board of Statutory Auditors
 - c) the General Manager
 - d) the Deputy General Manager of the Bank and the Manager Responsible for preparing the financial reports (if appointed)
 - e) the members of the Board of Directors of Fondazione Cassa di Risparmio di Asti
 - f) the members of the Board of Statutory Auditors of Fondazione Cassa di Risparmio di Asti
 - g) the General Manager of Fondazione Cassa di Risparmio di Asti.



PART H RELATED PARTY TRANSACTIONS

- the Close Family Members of one of the parties set out in point a) (if applicable) or d);
- the entities in which one of the parties set out in point d) or e) exercises Control, Joint Control or Significant Influence or directly or indirectly holds a significant stake, in any event of no less than 20% of the voting rights;
- collective or individual, Italian or foreign supplementary pension funds set up for employees of the Group or of any other entity correlated thereto, in the amount in which those funds were established or promoted by the Group or in the event that the Group may influence their decision-making processes.

The related party transactions in 2024 are shown below:

	ATTIVO ⁽¹⁾	PASSIVO	FONDO SVALUTAZIONE	AZIONI	GARANZIE E IMPEGNI
Fondazione Cassa di Risparmio di Asti (a)	0	16.478	0	115.728	0
Società Controllate (a)	0	0	0	0	0
Società esercenti Influenza Notevole (a)	76	22.024	0	46.972	0
Esponenti (d)	446	3.853	0	127	73
Altre Parti Correlate (e,f)	17.483	15.813	6.321	123	18.684
TOTALE	18.005	58.168	6.321	162.950	18.757

	INTERESSI ATTIVIE COMM.NI	INTERESSI PASSIVIE COMM.NI	DIVIDENDI	ALTRI PROVENTI	ALTRE SPESE AMM.VE
Fondazione Cassa di Risparmio di Asti (a)	0	559	6.728	102	0
Società Controllate (a)	0	0	0	0	0
Società esercenti Influenza Notevole (a)	7	0	2.731	0	3
Esponenti (d)	33	107	6	0	4.762
Altre Parti Correlate (e,f)	1.111	231	13	55	310
TOTALE	1.151	897	9.478	157	5.075

The effect on the income statement of the valuation of exposures to related parties amounted to € 6,3 million.

The amount of the loss recognised in the income statement as a surplus in the provision for related parties was € 67 thousand.

In general, the Group's transactions with its Related Parties and Associated Parties are carried out in compliance with the criteria of substantive and procedural correctness, at equivalent conditions to those applied to operations concluded with independent third parties. Transactions between the Group and other Related Parties and Associated Parties are attributable to normal operations and are implemented at market conditions, equivalent to that implemented with unrelated



PART H
RELATED PARTY
TRANSACTIONS

counterparties with the same creditworthiness and, in any event, based on assessments of mutual cost-effectiveness, in compliance with existing regulations.



PART I – SHARE-BASED PAYMENT ARRANGEMENTS

PART I – SHARE-BASED PAYMENT ARRANGEMENTS

QUALITATIVE INFORMATION

1. Description of share-based payment agreements

Banca di Asti, as Parent Company, prepares the annual Document on Remuneration and Incentive Policies and their implementation. For the year 2024, the document, drawn up pursuant to the most recent Directives issued by the Supervisory Authorities and in particular pursuant to Bank of Italy Circular 285 of 17 December 2013 - 37th update, was approved by the Bank's Shareholders' Meeting on 29 April 2024.

Remuneration policies are a fundamental tool in support of the Group's medium and long-term strategies and are defined with the aim of ensuring, in the interest of all stakeholders, remuneration systems increasingly linked to company results, appropriately adjusted to take account of all risks, consistent with the levels of capital and liquidity necessary to deal with the activities undertaken and, in any case, such as to avoid distorted incentives that may lead to regulatory violations or excessive risk-taking. The Policies are aimed at attracting, motivating and retaining people, creating a sense of identity and developing a culture linked to performance and merit. In compliance with supervisory regulations on Remuneration Policies, with a view to ensuring remuneration systems in line with the company's medium/long-term strategies and objectives, to identified Staff, due to the impact that their activities may determine on the risk profile assumed by the Bank and by the Group as a whole, more detailed rules are applied regarding the methods of payment of the variable remuneration paid.

For identified Staff, part of the variable remuneration component is subject to immediate disbursement (up-front) for a portion equal to 60%. The remaining portion of the variable component, equal to 40%, is disbursed with a four-year deferral. For both components, at least 50% of the bonus is disbursed in financial instruments issued by the Group (Phantom Shares) and is subject to retention clauses that align the incentives with the long-term interests of the Bank. The "particularly high" amount of variable remuneration, a threshold beyond which the deferral of accrued premiums is equal to 60%, is set at € 424 thousand, with a deferral period of no less than five years. The rules on the functioning of the incentive system for the year 2024 are contained in the "Regulation of the Phantom Shares Plan - Variable Remuneration 2024" approved by the Shareholders' Meeting of the Bank on 29 April 2024. The beneficiaries of the Phantom shares Plan are the persons included in the perimeter of the Group's identified staff, identified by name pursuant to the Supervisory Provisions and the remuneration Policies.

On the basis of what is defined by the Remuneration Policies, the Plan envisages two payment schemes:

- Payout 1, applicable to beneficiaries whose Variable Remuneration is not of a "particularly high" amount, which provides for:



- an immediate disbursement (up-front) of 60%, of which 50% in cash and 50% in Phantom Shares;
- a disbursement with 4-year deferral of the remaining 40%, of which 50% in cash and 50% in Phantom Shares;
- a retention period, starting from the allocation date, of 2 years for Phantom Shares paid as an up-front portion and 1 year for Phantom Shares paid as a deferred portion.
- Payout 2, applicable to beneficiaries whose variable remuneration is of a “particularly high” amount (as identified by the Remuneration Policies), which provides for:
 - an immediate disbursement (up-front) of 40%, of which 50% in cash and 50% in Phantom Shares;
 - a disbursement with a 5-year deferral of the remaining 60%, of which 50% in cash and 50% in Phantom Shares;
 - a retention period, starting from the allocation date, of 2 years for Phantom Shares paid as an up-front portion and 1 year for Phantom Shares paid as a deferred portion.

For more details on the methods and terms of allocation of the shares under the Documents referred to above, please refer to the Document on Remuneration Policies published on the institutional website at www.bancadiasti.it

QUANTITATIVE INFORMATION

1. Other information.

During 2024, the Group allotted a total of 50,353 Phantom Shares of which 30,212 as up-front and 20,141 as deferred shares. The Phantom Shares in question relate to the “Phantom Shares Plan - 2022-2023 variable remuneration” approved by the Ordinary Shareholders' Meeting on 27 April 2023 and remain subject to the positive verification of all future conditions pursuant to the Regulations of the Phantom Shares Plan.



PART L SEGMENT REPORTING

PART L – SEGMENT REPORTING

The segment reporting, in compliance with the provisions of the accounting standard IFRS 8, refers to the organizational and management structure of the Group. The Bank operates by carrying out credit intermediation, savings management and offering third-party insurance products; therefore the organizational structure of the Cassa di Risparmio di Asti S.p.A. Group, like that of commercial banks in general, has neither segment articulations nor divisionalizations. In this sense, the reporting and planning system used by the company management to monitor the performance of the results and make operational decisions regarding the allocation of resources is structured at Bank level and does not allow a complete subdivision of the items by individual area of business.

Pitagora S.p.A. and We Finance S.p.A., as the intermediaries specialising in salary/pension-backed loans, have certain particular management and operational characteristics that make it appropriate to conduct the monitoring of results.

For information purposes only, this section contains information derived from the financial statement data relating to the activities of the following sectors:

- Commercial Banking: activities relating to both retail and corporate customers of the Group Banks, regarding lending, i.e. products and services relating to loans, deposits, financial, banking and payment services, financial and insurance products, asset management and credit and debit cards;
- Investment Banking: activities relating to the own securities portfolio and the interbank market of Group Banks;
- Corporate Centre: activities of governance and business support to the operation of Group Banks;
- Specialised Banking: activities performed by the intermediaries specialising in the segment of salary/pension-backed loans, Pitagora S.p.A. and We Finance S.p.A.

The segment income statement and balance sheet figures correspond to their respective financial statement items.

The balance sheet and income statement figures relating to the companies Pitagora and We Finance also include the values referring to the non-recourse transfer of loans.

The criteria used to determine the amounts are as follows:

- interest margin: direct attribution of the single income items;
- non-interest margin: direct allocation of single fee and commission items;
- operating costs: direct attribution, or attribution through criteria of allocation to the single organisational units;
- provisions and adjustments: direct attribution or attribution through allocation criteria.



DISTRIBUTION BY OPERATING SEGMENT - BALANCE SHEET FIGURES

SEGMENT RESULTS - BALANCE SHEET FIGURES - ASSETS	2024	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
ASSETS					
Cash	896,745	60,293	833,467	0	2,985
Financial assets	1,197,742	0	1,197,742	0	0
Financial assets measured at amortised cost	9,654,470	6,105,606	2,328,442	14,486	1,205,936
- Loans and advances to banks	148,876	0	134,760	12,674	1,442
- Loans and advances to customers	7,354,878	6,105,606	42,966	1,812	1,204,494
- Other assets measured at amortised cost	2,150,716	0	2,150,716	0	0
Hedging derivatives	2	0	2	0	0
Equity investments	234	0	0	0	234

SEGMENT RESULTS - BALANCE SHEET FIGURES - LIABILITIES	2024	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
LIABILITIES					
Deposits from banks	710,930	204	696,275	2,128	12,323
Financial liabilities held for trading	1,936	0	1,936	0	0
Direct funding	10,674,211	9,118,041	1,306,992	15,534	233,643
- Deposits from customers	9,643,820	8,087,651	1,306,992	15,534	233,643
- Debt securities in issue	1,017,895	1,017,895	0	0	0
- Financial liabilities measured at fair value	12,496	12,496	0	0	0
Hedging derivatives	79,531	4,510	75,021	0	0

SEGMENT RESULTS - BALANCE SHEET FIGURES - ASSETS	2023	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
ASSETS					
Financial assets	646,993	62,782	583,465	0	746
Financial assets measured at amortised cost	1,095,462	0	1,095,462	0	0
- Loans and advances to banks	9,656,832	6,218,628	2,270,431	3,275	1,164,498
- Loans and advances to customers	192,294	0	189,260	1,475	1,559
- Other assets measured at amortised cost	7,423,974	6,218,628	40,607	1,800	1,162,939
Hedging derivatives	2,040,564	0	2,040,564	0	0
Equity investments	18,312	0	18,312	0	0

SEGMENT RESULTS - BALANCE SHEET FIGURES - LIABILITIES	2023	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
LIABILITIES					
Deposits from banks	765,196	0	750,010	0	15,186
Financial liabilities held for trading	1,974	34	1,940	0	0
Direct funding	10,398,412	8,942,642	1,107,466	16,676	331,627
- Deposits from customers	9,209,382	7,753,613	1,107,466	16,676	331,627
- Debt securities in issue	1,176,262	1,176,262	0	0	0
- Financial liabilities measured at fair value	12,768	12,768	0	0	0
Hedging derivatives	112,954	5,159	107,795	0	0



PART L SEGMENT REPORTING

DISTRIBUTION BY OPERATING SEGMENT - INCOME STATEMENT FIGURES

SEGMENT RESULTS - INCOME STATEMENT FIGURES	2024	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
+ Net banking income (1)	371,177	254,546	58,601	835	57,195
- Operating costs (2)	-277,248	-149,302	-5,534	-90,481	-31,931
= Gross operating profit	93,929	105,244	53,067	-89,646	25,264
+/- Net allocations to provisions for risks and charges	-15,614	-11,688	-58	-118	-3,751
+/- Gains/(losses) on equity investments	0	0	0	0	0
+/- Gains/(losses) on disposal of investments	-270	0	0	-270	0
= Profit/(loss) before tax from continuing operations	78,045	93,556	53,009	-90,033	21,513

SEGMENT RESULTS - INCOME STATEMENT FIGURES	2023	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
+ Net banking income (1)	376,862	321,445	19,265	2,366	33,786
- Operating costs (2)	-273,483	-143,470	-5,027	-96,457	-28,529
= Gross operating profit	103,379	177,975	14,238	-94,091	5,258
+/- Net allocations to provisions for risks and charges	-3,556	-683	-1	-24	-2,848
+/- Gains/(losses) on equity investments	0	0	0	0	0
+/- Gains/(losses) on disposal of investments	57	0	0	57	0
= Profit/(loss) before tax from continuing operations	99,880	177,291	14,237	-94,058	2,411

(1) Includes the reclassified income statement items 10 - 20 - 40 - 50 - 70 - 80 - 90 - 100 - 110 - 130 - 230

(2) Includes the reclassified income statement items 190 - 210 - 220

CHANGES DURING 2023 COMPARED WITH 2022	2024/ 2023	COMMERCIAL BANKING	INVESTMENT BANKING	CORPORATE CENTRE	SPECIALISED BANKING (PITAGORA SPA - WE FINANCE SPA)
+ Net banking income (1)	-5,685	-66,899	39,336	-1,531	23,409
- Operating costs (2)	-3,765	-5,832	-507	5,976	-3,402
= Gross operating profit	-9,450	-72,731	38,829	4,445	20,007
+/- Net allocations to provisions for risks and charges	-12,058	-11,005	-57	-93	-903
+/- Gains/(losses) on equity investments	0	0	0	0	0
+/- Gains/(losses) on disposal of investments	-327	0	0	-327	0
= Profit/(loss) before tax from continuing operations	-21,835	-83,736	38,772	4,025	19,103

**PART M – DISCLOSURE ON LEASES****SECTION 1 – LESSEE****QUALITATIVE INFORMATION**

The scope of IFRS 16 of the Cassa di Risparmio di Asti Group includes lease agreements on real estate units, mainly for commercial activity (branches), which represent 98% of the rights of use (of which 5% due to banks) and rental contracts for the fleet of company cars, which represent the remaining 2%.

Short-term or low value lease agreements are recorded in accordance with that set out in the accounting standard IFRS 16.

QUANTITATIVE INFORMATION

Please refer to Parts B and C of these Notes to the consolidated financial statements.

SECTION 2 – LESSOR**QUALITATIVE INFORMATION**

The Cassa di Risparmio di Asti Group only has operating leases in force which mainly regard commercial leases of owned properties.

QUANTITATIVE INFORMATION**1. Balance sheet and income statement information**

Please refer to Parts B and C of these Notes to the consolidated financial statements.

2. Finance leases

There are no items of this type.



**PART M
DISCLOSURE
ON LEASES**

3. *Operating leases*

3.1 Classification by time band of payments to be received

Time band	Total 2024	Total 2023
	Lease payments to be received	
Up to 1 year	2,036	1,928
1 to 2 years	1,830	1,802
2 to 3 years	1,716	1,552
3 to 4 years	894	1,326
4 to 5 years	585	804
Over 5 years	908	908
Total lease payments to be received	7,969	8,320

3.2 Other information

There is no additional information to report.



PUBLICATION OF FEES FOR AUDITING AND FOR SERVICES OTHER THAN AUDITING

In compliance with the provisions issued as part of the reform of the Consolidated Finance Act - TUF (Italian Law 262 of 28.12.2005, as amended), the fees paid pertaining to the financial year 2024 (net of expenses, VAT and CONSOB contribution) for auditing and control activities pursuant to Articles 14 and 16 of Italian Legislative Decree 39/2010 and for other services provided in the year 2024 by Deloitte & Touche S.p.A and companies belonging to its network, are summarised below.

Type of services	Description of the service	Provider of the service	Fees (€/thousand)
Auditing	Annual financial statements, half-yearly financial statements, accounting control	Deloitte & Touche S.p.A.	402
Other certification services ⁽¹⁾	Other certifications required by law	Deloitte & Touche S.p.A.	336
Other services ⁽²⁾	Other services	Deloitte Consulting S.r.l.	35
Total			773

(1) Other certification services:

- Confort letter T2 emission	100
- Limited review 30/09/2024	80
- Mifid 2 report	63
- Review sustainability reporting	57
- securitisation and auditing activities	30
- consolidated financial statements translation services	5
- other	1

(2) Other services:

- gap analysis and value chain activities	35
---	----



OTHER INFORMATION

Disclosure on public grants pursuant to Article 1, paragraph 125 of Italian Law 124 of 4 August 2018 (“Annual Law for Market and Competition”)

The provisions of Article 1, paragraph 125 of Italian Law 124 of 4 August 2017, called the “Annual Law for Market and Competition” introduced new disclosure obligations for companies regarding subsidies, grants, paid assignments and, in any event, economic benefits of any type received from the public administration, equivalent entities and other subjects indicated in the Law.

The purpose of the new regulatory provisions is to guarantee greater transparency in the financial reporting system between public entities and private companies.

The disclosure obligation introduced requires the provision, from 31 December 2018 onwards, in the notes to the financial statements and in any notes to the consolidated financial statements, of disclosure of public grants received from the public administration and the other parties indicated in Article 1 of that Law. Failure to comply with the publication obligation would result in the amounts being returned to the disbursing party within three months from the publication of the financial statements.

In order to avoid the accumulation of irrelevant information, the publication obligation shall not apply where the amount of public grants received is less than € 10 thousand.

Taking account of the purpose of the regulation and the approaches that have arisen, the disclosure shall not include fees for services of the company in carrying out business, tax subsidies accessible to all companies or disbursements to customers of subsidised loans, as these regard the disbursement of the funds of others.

The table below shows the amounts collected during 2024 by the Bank by way of subsidies, grants, paid assignments and, in any event, economic benefits of any type.

Receiving party	Disbursing party	Amounts collected (€/thousand)	Reason
Cassa di Risparmio di Asti S.p.A. Group	FBA - Fondo Banche Assicurazioni [Bank and Insurance Companies Fund]	729	Grants for personnel training
Cassa di Risparmio di Asti S.p.A. Group	Fondir - Fondo paritetico Interprofessionale per la Formazione Continua [Joint Interprofessional for Continuing Education Fund]	39	Grants for personnel training
Cassa di Risparmio di Asti S.p.A. Group	Forma.temp - Fondo per la formazione e il sostegno al reddito dei lavoratori in somministrazione [Fund for training and income support for temporary workers]	5	Grants for personnel training
Total		773	



GRUPPO CASSA DI
RISPARMIO DI ASTI

INDEPENDENT AUDITORS' REPORTS ON THE CONSOLIDATED FINANCIAL STATEMENTS 2024



Deloitte.

Deloitte & Touche S.p.A.
Galleria San Federico, 54
10121 Torino
Italia

Tel: +39 011 55971
www.deloitte.it

INDEPENDENT AUDITOR'S REPORT PURSUANT TO ARTICLE 14 OF LEGISLATIVE DECREE No. 39 OF JANUARY 27, 2010 AND ARTICLE 10 OF THE EU REGULATION 537/2014

To the Shareholders of
Cassa di Risparmio di Asti S.p.A.

REPORT ON THE AUDIT OF THE CONSOLIDATED FINANCIAL STATEMENTS

Opinion

We have audited the consolidated financial statements of Cassa di Risparmio di Asti Group (the "Group"), which comprise the consolidated balance sheet as at December 31, 2024, the consolidated income statement, the statement of consolidated comprehensive income, the statement of changes in consolidated shareholders' equity and the consolidated statement of cash flows for the year then ended, and the notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements give a true and fair view of the consolidated financial position of the Group as at December 31, 2024, and of its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board and adopted by the European Union and the requirements of national regulations issued pursuant to art. 43 of Italian Legislative Decree no. 136/15.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISA Italia). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Consolidated Financial Statements* section of our report. We are independent of Cassa di Risparmio di Asti S.p.A. (the "Bank") in accordance with the ethical requirements applicable under Italian law to the audit of the financial statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Ancona Bari Bergamo Bologna Brescia Cagliari Firenze Genova Milano Napoli Padova Parma Roma Torino Treviso Udine Verona
Sede Legale: Via Santa Sofia, 28 - 20122 Milano | Capitale Sociale: Euro 10.886.330,00 i.v.
Codice Fiscale/Registro delle Imprese di Milano Monza Brianza Lodi n. 03049660166 - R.E.A. n. MI-1720239 | Partita IVA: IT 03049660166

Il nome Deloitte si riferisce a una o più delle seguenti entità: Deloitte Touche Tohmatsu Limited, una società inglese a responsabilità limitata ("DTTL"), le member firm aderenti al suo network e le entità a esse collegate. DTTL e ciascuna delle sue member firm sono entità giuridicamente separate e indipendenti tra loro. DTTL (denominata anche "Deloitte Global") non fornisce servizi ai clienti. Si invita a leggere l'informativa completa relativa alla descrizione della struttura legale di Deloitte Touche Tohmatsu Limited e delle sue member firm all'indirizzo www.deloitte.com/about.

© Deloitte & Touche S.p.A.



Deloitte.

2

Classification of performing loans and advances to customers measured at amortized cost

Description of the key audit matter

As highlighted in the notes to the consolidated financial statements *Part B – Information on the consolidated balance sheet Assets – Section 4 -Financial assets measured at amortised cost*, at December 31, 2024 the net performing loans and advances to customers measured at amortised cost (stage 1 and stage 2) amount to Euro 7,014 million.

As described in *Part A – Accounting policies* and in the *Qualitative information* disclosed in the *Section 1 - Credit risk* of *Part E – Information on risks and relative hedging policies* of the notes to the consolidated financial statements, as part of its policies for the managing and classification of performing loans and advances to customers measured at amortised cost, the Group refers to sector regulations, supplemented by different managing processes and analysis tools based on homogeneous risk categories; in the application of such processes and tools, the elements of uncertainty relating to the macroeconomic context have been also taken into account.

Given the significance of the amount of performing loans and advances to customers measured at amortized cost in the financial statements, the complexity of the classification process of these loans into homogeneous risk categories adopted by the Group, we considered that the classification of performing loans and advances to customers measured at amortized cost was a key audit matter for the Group's consolidated financial statements as at December 31, 2024.

Audit procedures performed

The procedures carried out, also using the support of our IT experts, have included, among the others, the following:

- understanding of the internal regulations and processes set up by the Group in relation to the classification and credit quality monitoring activities of performing loans and advances to customers measured at amortized cost to ensure their classification in accordance with the regulatory framework and the applicable accounting standards, also taking into account the findings emerged in the inspection carried out by the Bank of Italy during the fiscal year, with specific reference to the aforementioned processes and activities;
- checking the implementation of the relevant controls identified in relation to the processes above;
- checking, on a sample of credit files, the accuracy of the classification of performing loans and advances to customers measured at amortized cost based on the regulatory framework, the Group's internal policies, and the applicable accounting standards;



Deloitte.

3

- analysis of subsequent events occurring after the reference date of the financial statements;
- checking the adequacy and compliance of the disclosures provided in the notes to the consolidated financial statements in accordance with the regulatory framework and the applicable accounting standards.

Classification and measurement of non-performing loans and advances to customers measured at amortized cost

Description of the key audit matter

As highlighted in the report on operations in the paragraph *Credit quality* and in the *Quantitative information* relating to the *Quality of Credit* disclosed in *Part E – Information on risks and relative hedging policies* of the notes to the consolidated financial statements, at December 31, 2024 the gross non-performing loans and advances to customers measured at amortised cost amount to Euro 389 million, the relating value adjustments amount to Euro 179 million and the relating net exposure amounts to Euro 210 million.

The coverage ratio at December 31, 2024 is equal to 46%. In particular, the above mentioned non-performing exposures, classified according to the International Financial Reporting Standard IFRS 9 "Financial instruments" in the so-called "Stage 3", include net bad loans for Euro 31,3 million with a coverage ratio of 67.2%, net unlikely to pay loans for Euro 149,7 million with a coverage ratio of 42% and net past-due loans for Euro 29,2 million with a coverage ratio of 18.4%.

The notes to the consolidated financial statements - *Part A - Accounting Policies* show:

- the classification rules of non-performing loans and advances to customers measured at amortized cost adopted by the Group, according with the current instructions of the Supervisory Authorities and in compliance with the applicable accounting standards;
- the methods for determining the recoverable amount of the above loans and advances which are based on valuation criteria that consider the various alternative scenarios identified for the managing loans and advances to customers, as well as on Groups's internal policies' provisions for each classification category of non-performing loans and advances to customers.


Deloitte.

4

Given the significance of the amount of non-performing loans and advances to customers measured at amortised cost recorded in the consolidated financial statements, the complexity of the classification's process of such loans in homogeneous credit quality categories adopted by the Group, as well as the relevance of the discretionary components inherent in the recoverable amount's estimated nature, we considered that the classification and measurement of non-performing loans and advances to customers measured at amortized cost were a key audit matter for the Group's consolidated financial statements as at December 31, 2024.

Audit procedures performed

The procedures carried out, also using the support of our IT experts and other experts belonging to the Deloitte network, have included, among the others, the following:

- obtaining an understanding of the internal rules and the managing processes set up by the Group in relation to the activities for the classification and the recoverable amount estimation of non-performing loans and advances to customers measured at amortized cost to check the compliance with the regulatory framework and the applicable accounting standards, also taking into account the findings emerged in the inspection carried out by the Bank of Italy during the fiscal year, with specific reference to the aforementioned processes and activities;
- checking the implementation and operating effectiveness of the relevant controls identified in relation to the above processes;
- analysis and understanding of the valuation models adopted for estimating the recoverable value and the resulting value adjustments' determination in the various alternative scenarios identified by the Group;
- drawing qualitative and trend analysis of non-performing loans and advances to customers by calculating appropriate qualitative and quantitative indicators in order to identify possible matters of interest;
- checking, on a sample of credit files selected also on the basis of the matters of interest emerging from the analysis referred to in the previous point, the accuracy of the classification and determination of the recoverable amount of the above loans and advances in accordance with the regulatory framework, the Group's internal policies, and the applicable accounting standards, also by obtaining the external confirmations by the lawyers appointed for their collection;



Deloitte.

5

- analysis of subsequent events occurring after the reference date of the financial statements;
- checking the adequacy and compliance of the disclosures provided in the notes to the consolidated financial statements in accordance with the regulatory framework and the applicable accounting standards.

Impairment test on goodwill

Description of the key audit matter

As highlighted in the notes to the consolidated financial statements *Part B – Information on the consolidated balance sheet Assets – Section 10 – Intangible assets*, the intangible assets as at December 31, 2024 include a goodwill of Euro 66 million, which has been allocated to three cash generating units (CGUs) identified in Cassa di Risparmio di Asti S.p.A. in the controlled companies Pitagora Finanziamenti Contro Cessione del Quinto S.p.A. and We Finance S.p.A..

According with the accounting standard IAS 36 "*Impairment of assets*", goodwill is not amortized but subjected to an impairment test at least annually, or more frequently when there are impairment highlights, by comparing the carrying amount with the relevant recoverable amount of the CGUs.

The Directors of the Bank have subjected the goodwill to the *impairment test* through the value in use determining, by the adoption of a model based on economic and financial projections developed considering assumptions, hypotheses and parameters that are subject to a significant degree of discretion, as well as being influenced by external events and factors.

In *Part A - Accounting Policies* and in *Part B – Information on the consolidated balance sheet Assets* of the notes to the consolidated financial statements, there are provided the disclosures requested by the applicable international accounting standards, as well as the main estimates made by the Directors of the Bank which have also taken into account the current macroeconomic context's developing. In particular, disclosures are provided in relation to the carrying amount and to the determining manner of the value in use by applying the *Dividend Discount Method* in the *Excess Capital* version, developed on the basis of the capital situation as at 31 December 2024 of the above CGUs and the relating economic-financial projections for 2025-2029 period approved respectively by the Board of Directors of the Bank and the controlled companies Pitagora Finanziamenti Contro Cessione del Quinto S.p.A. and We Finance S.p.A..



Deloitte.

6

Given the significance of the amount of the goodwill recorded in the consolidated financial statements, the complexity and the subjectivity of the estimates relating to the value in use of the CGUs, in particular with reference to the key variables of the model adopted to develop the *impairment test*, we considered that the impairment test of goodwill was a key audit matter for the Group's consolidated financial statements as at December 31, 2024.

Audit procedures performed	<p>The procedures carried out, also using the support of experts belonging to the Deloitte network, have included, among the others, the following:</p> <ul style="list-style-type: none"> • obtaining an understanding of the process, the method and the assumptions adopted by the Bank to carry out the impairment test; • critical and reasonableness analysis of the main parameters and the main assumptions adopted to determine the economic-financial projections and understanding the main elements underlying their elaboration by obtaining information from the Bank; • checking the logical and mathematical accuracy of the model used; • reviewing the sensitivity analyses of the outcomes performed by the Bank based on the changes in the main parameters used in the carrying out of <i>impairment test</i>; • checking the adequacy and compliance of the disclosures provided in the notes to the consolidated financial statements in accordance with the regulatory framework and the applicable accounting standards.
-----------------------------------	--

Responsibilities of the Directors and the Board of Statutory Auditors for the Consolidated Financial Statements

The Directors are responsible for the preparation of consolidated financial statements that give a true and fair view in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board and adopted by the European Union and the requirements of national regulations issued pursuant to art. 43 of Italian Legislative Decree no. 136/15 and, within the terms established by law, for such internal control as the Directors determine is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the Directors are responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless they have identified the existence of the conditions for the liquidation of the parent company Cassa di Risparmio di Asti S.p.A. or for the termination of the business or have no realistic alternatives to such choices.



Deloitte.

7

The Board of Statutory Auditors is responsible for overseeing, within the terms established by law, the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISA Italia) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with International Standards on Auditing (ISA Italia), we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation;
- obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the Group audit. We remain solely responsible for our audit opinion.



Deloitte.

8

We communicate with those charged with governance, identified at an appropriate level as required by ISA Italia, regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence applicable in Italy, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence and, where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report.

Other information communicated pursuant to art. 10 of the EU Regulation 537/2014

The Shareholders' Meeting of Cassa di Risparmio di Asti S.p.A. has appointed us on April 30, 2019, as auditors of the Bank for the years from December 31, 2019 to December 31, 2027.

We declare that we have not provided prohibited non-audit services referred to in art. 5 (1) of EU Regulation 537/2014 and that we have remained independent of the Bank in conducting the audit.

We confirm that the opinion on the consolidated financial statements expressed in this report is consistent with the additional report to the Board of Statutory Auditors, in its role of Audit Committee, referred to in art. 11 of the said Regulation.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

Opinions and statement pursuant to art. 14, paragraph 2, sub-paragraphs e), e-bis) and e-ter) of Legislative Decree 39/10 and pursuant to art. 123-bis, paragraph 4, of Legislative Decree 58/98

The Directors of Cassa di Risparmio di Asti S.p.A. are responsible for the preparation of the report on operations and the report on corporate governance and the ownership structure of Cassa di Risparmio di Asti Group as at December 31, 2024, including their consistency with the related consolidated financial statements and their compliance with the law.

We have carried out the procedures set forth in the Auditing Standard (SA Italia) n. 720B in order to:

- express an opinion on the consistency of the report on operations and of some specific information contained in the report on corporate governance and the ownership structure set forth in art. 123-bis, n. 4 of Legislative Decree 58/98 with the consolidated financial statements;
- express an opinion on compliance with the law of the report on operations, excluding the section related to the consolidated corporate sustainability reporting, and of some specific information contained in the report on corporate governance and ownership structure set forth in art. 123-bis, n. 4 of Legislative Decree 58/98;



Deloitte.

9

- make a statement about any material misstatement in the report on operations and in some specific information contained in the report on corporate governance and ownership structure set forth in art. 123-bis, n. 4 of Legislative Decree 58/98.

In our opinion, the report on operations and the specific information contained in the report on corporate governance and the ownership structure are consistent with the consolidated financial statements of Cassa di Risparmio di Asti Group as at December 31, 2024.

In addition, in our opinion, the report on operations, excluding the section related to the consolidated corporate sustainability reporting, and the specific information contained in the report on corporate governance and ownership structure set forth in art. 123-bis, n. 4 of Legislative Decree 58/98 are prepared in accordance with the law.

With reference to the statement referred to in art. 14, paragraph 2, sub-paragraph e-ter), of Legislative Decree 39/10, made on the basis of the knowledge and understanding of the entity and of the related context acquired during the audit, we have nothing to report.

Our opinion on the compliance with the law does not extend to the section related to the consolidated corporate sustainability reporting. The conclusions on the compliance of that section with the law governing criteria of preparation and with the disclosure requirements outlined in art. 8 of the EU Regulation 2020/852 are expressed by us in the assurance report pursuant to art. 14-bis of Legislative Decree 39/10.

DELOITTE & TOUCHE S.p.A.

Signed by
Daniela Diana
Partner

Turin, Italy
April 2nd, 2025

*This independent auditor's report has been translated into the English language solely for the convenience of international readers.
Accordingly, only the original text in Italian language is authoritative.*



Deloitte.

Deloitte & Touche S.p.A.
Galleria San Federico, 54
10121 Torino
Italia

Tel: +39 011 55971
www.deloitte.it

**INDEPENDENT AUDITOR'S REPORT
ON THE CONSOLIDATED SUSTAINABILITY STATEMENT
PURSUANT TO ARTICLE 14-BIS OF LEGISLATIVE DECREE No. 39 OF JANUARY 27, 2010**

**To the Shareholders of
Cassa di Risparmio di Asti S.p.A.**

Conclusion

Pursuant to arts. 8 and 18, paragraph 1 of Legislative Decree no. 125 of September 6, 2024 (hereinafter also the "Decree"), we have carried out a limited assurance engagement on the consolidated sustainability statement of the Cassa di Risparmio di Asti Group (hereinafter also the "CR Asti Group" or "Group") for the year ended on December 31st, 2024, prepared pursuant to Art. 4 of the Decree, included in the specific section of the consolidated report on operations.

Based on the work performed, nothing has come to our attention that causes us to believe that:

- the consolidated sustainability statement of the CR Asti Group for the year ended on December 31st, 2024 is not prepared, in all material respects, in accordance with the reporting principles adopted by the European Commission pursuant to the Directive (EU) 2013/34/EU (European Sustainability Reporting Standards, hereinafter also "ESRS");
- the information included in the paragraph "Disclosure pursuant to Article 8 of Regulation 2020/852 (EU Taxonomy Regulation)" of the consolidated sustainability statement is not prepared, in all material respects, in accordance with art. 8 of Regulation (EU) No. 852 of June 18, 2020 (hereinafter also the "Taxonomy Regulation").

Basis for conclusion

We conducted the limited assurance engagement in accordance with the assurance standard of the sustainability report - "Principio di Attestazione della Rendicontazione di Sostenibilità - SSAE (Italia)". The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the level of assurance that would have been obtained had we performed a reasonable assurance engagement. Our responsibilities pursuant to that standard are further described in the paragraph *Auditor's responsibilities for the limited assurance of the consolidated sustainability statement* of this report.

We are independent in accordance with the independence and other ethical requirements applicable under Italian law to the limited assurance engagement of the consolidated sustainability statement.

Ancona Bari Bergamo Bologna Brescia Cagliari Firenze Genova Milano Napoli Padova Parma Roma Torino Treviso Udine Verona

Sede Legale: Via Santa Sofia, 28 - 20122 Milano | Capitale Sociale: Euro 10.668.930,00 i.v.

Codice Fiscale/Registro delle Imprese di Milano Monza Brianza Lodi n. 03049560166 - R.E.A. n. MI-1720239 | Partita IVA: IT 03049560166

Il nome Deloitte si riferisce a una o più delle seguenti entità: Deloitte Touche Tohmatsu Limited, una società inglese a responsabilità limitata ("DTTL"), le member firm aderenti al suo network e le entità a esse correlate. DTTL e ciascuna delle sue member firm sono entità giuridicamente separate e indipendenti tra loro. DTTL (denominata anche "Deloitte Global") non fornisce servizi ai clienti. Si invita a leggere l'informativa completa relativa alla descrizione della struttura legale di Deloitte Touche Tohmatsu Limited e delle sue member firm all'indirizzo www.deloitte.com/about.

© Deloitte & Touche S.p.A.



Deloitte.

2

Our firm applies International Standard on Quality Management (ISQM Italia) 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Other matter

The comparative information for the year ended on December 31st, 2023 presented in the consolidated sustainability statement in the paragraph "Disclosure pursuant to Article 8 of Regulation 2020/852 (EU Taxonomy Regulation)" has not been verified.

Responsibility of the Directors and the Board of Statutory Auditors of Cassa di Risparmio di Asti S.p.A. for the consolidated sustainability statement

The Directors are responsible for developing and implementing the procedures performed to identify the information reported in the consolidated sustainability statement in accordance with the ESRS (hereinafter the "double materiality assessment process") and for disclosing this process in the paragraph ESRS 2 – General disclosures – Impacts, risks and opportunities management" of the consolidated sustainability statement.

The Directors are also responsible for the preparation of the consolidated sustainability statement, which includes the information identified as part of the double materiality assessment process, in accordance with the requirements of Art. 4 of the Decree, including:

- compliance with ESRS;
- compliance of the information included in the paragraph "Disclosure pursuant to Article 8 of Regulation 2020/852 (EU Taxonomy Regulation)" with art. 8 of the Taxonomy Regulation.

Such responsibility involves designing, implementing and maintaining, within the terms established by the law, such internal control that the Directors determine necessary to enable the preparation of the consolidated sustainability statement in accordance with the requirements of the art. 4 of the Decree that is free from material misstatements, whether due to fraud or error. Furthermore, the abovementioned responsibility involves the selection and application of appropriate methods in elaborating information and making assumptions and estimates about specific sustainability information that are reasonable in the circumstances.

The Board of Statutory Auditors is responsible for overseeing, within the terms established by law, the compliance with the provisions set out in the Decree.



Deloitte.

3

Inherent limitations in the preparation of the consolidated sustainability statement

In reporting forward looking information in accordance with ESRS, the Directors are required to prepare the forward looking information on the basis of assumptions, as described in the consolidated sustainability statement, regarding events that may occur in the future and possible future actions of the Group. Due to the inherent uncertainty regarding any future event, including whether these events will take place and their extent and timing, the variances between actual outcomes and forward looking information could be significant.

The information provided by the Group regarding Scope 3 emissions is subject to greater inherent limitations compared to those related to Scope 1 and 2 emissions. This is due to the lower availability and relative accuracy of the data used to define the information on Scope 3 emissions, both quantitative and qualitative, in relation to the value chain, as indicated in the paragraph ESRS 2 – General disclosures – Basis for the preparation”.

Auditor's responsibilities for the limited assurance of the consolidated sustainability statement

Our objectives are to plan and perform procedures to obtain limited assurance about whether the consolidated sustainability statement is free from material misstatements, whether due to fraud or error, and to issue an assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, could influence the decisions of users taken on the basis of consolidated sustainability statement.

As part of the limited assurance engagement in accordance with the Principio di Attestazione della Rendicontazione di Sostenibilità - SSAE (Italia), we exercise professional judgment and maintain professional skepticism throughout the engagement.

Our responsibilities include:

- considering risks to identify and assess the disclosure where a material misstatement is likely to arise, either due to fraud or error;
- designing and performing procedures to verify disclosures in the sustainability statement where material misstatements are likely to arise. The risk of not detecting a material misstatement due to fraud is higher than the risk of not identifying a material misstatement due to error, as fraud may involve collusion, falsifications, intentional omissions, misrepresentations, or the override of internal control;
- the direction, supervision and performance of the limited assurance engagement of the consolidated sustainability statement. We remain solely responsible for the conclusion on the consolidated sustainability statement.



Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence as the basis for expressing our conclusion.

The procedures performed on the consolidated sustainability statement are based on our professional judgement and included inquiries, primarily with the personnel of the Group responsible for the preparation of information included in the consolidated sustainability statement, analysis of documents, recalculations and other procedures aimed to obtain evidence as appropriate.

Specifically, we performed the following main procedures partly in a preliminary phase before year end and then in a final phase up to the date of issuance of this report:

- understanding the business model, the Group's strategies and the context in which the Group operates with reference to sustainability matters;
- understanding the processes underlying the generation, collection, and management of qualitative and quantitative information included in the consolidated sustainability statement, including an analysis of the reporting perimeter;
- understanding the process carried out by the Group for the identification and evaluation of material impacts, risks and opportunities, based on the principle of double materiality, with reference to sustainability matters;
- identification of the information where a risk of material misstatement is likely to arise, taking into account, among others, factors related to the generation and collection of the information, to the existence of estimates and to the complexity of the related calculation methods, as well as qualitative and quantitative factors related to the nature of such information;
- design and performance of procedures, based on the professional judgment of the auditor of the consolidated sustainability report, to respond to identified risks of material misstatement, also with the support of experts belonging to the Deloitte network, with particular reference to specific environmental information;
- understanding of the process set up by the Group to identify eligible exposures and determine their aligned nature according to the requirements of the Taxonomy Regulation, and verifying the related information included in the consolidated sustainability statement;
- comparison of the information reported in the consolidated sustainability statement with the information included in the consolidated financial statements pursuant to the applicable financial reporting framework, or with the accounting data used for the preparation of the financial statements, or with the management data accounting in nature;



Deloitte.

5

- verification of the structure and presentation of the information included in the consolidated sustainability statement in accordance with ESRS, included the information related to the double materiality assessment process;
- obtaining the representation letter.

DELOITTE & TOUCHE S.p.A.

Signed by
Daniela Diana
Partner

Turin, Italy
April 2nd, 2025

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.





GRUPPO CASSA DI
RISPARMIO DI ASTI

ANNEXES



ANNEXES

Reconciliation between the reclassified financial statements and the statutory accounts

The tables of reconciliation between the reclassified financial statements set out in the Report on Operations and the mandatory Financial Statements established by the Bank of Italy with Circular 262 of 22 December 2005, as amended, are provided below.

RECONCILIATION BETWEEN THE RECLASSIFIED BALANCE SHEET AND THE STATUTORY BALANCE SHEET

Reclassified balance sheet items - Assets	Statutory balance sheet items - Assets	31.12.2024	31.12.2023
Cash and cash equivalents		896,745	646,993
	<i>Item 10 - Cash and cash equivalents</i>	896,745	646,993
Financial assets (other than loans)		1,168,751	1,022,851
	<i>Item 20 - Financial assets measured at fair value through profit or loss</i>	141,824	108,501
	- <i>Item 20 a) (partial) - Financial assets held for trading</i>	-49,808	-49,808
	- <i>Item 20 c) (partial) - Financial assets mandatorily measured at fair value</i>	-1,343	-1,343
	<i>Item 30 - Financial assets measured at fair value through other comprehensive income</i>	1,163,243	1,050,666
	- <i>Item 30 c) (partial) - Financial assets measured at fair value through other comprehensive income</i>	-85,165	-85,165
Financial assets measured at amortised cost		9,683,461	9,729,443
	<i>Item 40 a) - Loans and advances to banks</i>	148,800	192,292
	<i>Item 40 b) - Loans and advances to customers</i>	9,398,345	9,400,835
	+ <i>Item 20 a) (partial) - Financial assets held for trading</i>	49,808	49,808
	+ <i>Item 20 c) (partial) - Financial assets mandatorily measured at fair value</i>	1,343	1,343
	+ <i>Item 30 c) (partial) - Financial assets measured at fair value through other comprehensive income</i>	85,165	85,165
	- <i>Item 40 b) (partial) - Loans and advances to customers</i>	-2,150,716	-2,040,564
	<i>Item 40 b) (partial) - Loans and advances to customers - other financial assets measured at amortised cost</i>	2,150,716	2,040,564
Hedging derivatives		2	18,312
	<i>Item 80 - Hedging derivatives</i>	2	18,312
Equity investments		234	195
	<i>Item 70 - Equity investments</i>	234	195
Property, plant and equipment and intangible assets		286,279	292,292
	<i>Item 80 - Property, plant and equipment</i>	204,252	208,535
	<i>Item 90 - Intangible assets</i>	82,027	83,757
Tax assets		180,553	219,833
	<i>Item 100 - Tax assets</i>	180,553	219,833
Non-current assets held for sale and discontinued operations		2,375	2,375
	<i>Item 120 - Non-current assets held for sale and discontinued operations</i>	2,375	2,375
Other assets		793,824	781,781
	<i>Item 130 - Other assets</i>	793,824	781,781
Total assets		13,012,224	12,714,075



ANNEXES

Reclassified balance sheet items - Liabilities	Statutory balance sheet items - Liabilities	31.12.2024	31.12.2023
Deposits from banks		710,930	765,196
	<i>Item 10 a) - Deposits from banks</i>	710,930	765,196
Financial liabilities held for trading		1,936	1,974
	<i>Item 20 - Financial liabilities held for trading</i>	1,936	1,974
Direct funding		10,674,211	10,398,412
	<i>Item 10 b) - Deposits from customers</i>	9,643,820	9,209,382
	<i>Item 10 c) - Debt securities issued</i>	1,017,895	1,176,262
	<i>Item 30 - Liabilities designated at fair value</i>	12,496	12,768
Hedging derivatives		79,531	112,954
	<i>Item 40 - Hedging derivatives</i>	79,531	112,954
Tax liabilities		261	121
	<i>Item 60 - Tax liabilities</i>	261	121
Other liabilities		342,990	273,117
	<i>Item 80 - Other liabilities</i>	342,990	273,117
Provisions for risks and charges		52,774	46,094
	<i>Item 90 - Provision for employee severance pay</i>	13,692	13,656
	<i>Item 100 - Provisions for risks and charges</i>	39,082	32,438
Shareholders' equity		1,149,591	1,116,207
	<i>Item 120 - Valuation reserves</i>	-31,047	-37,562
	<i>Item 140 - Equity instruments</i>	97,567	97,567
	<i>Item 150 - Reserves</i>	307,807	261,065
	<i>Item 160 - Share premium reserve</i>	336,135	339,370
	<i>Item 170 - Share capital</i>	363,971	363,971
	<i>Item 180 - Treasury shares</i>	-3,031	-13,137
	<i>Item 190 - Minority shareholders' interests</i>	30,487	24,540
	<i>Item 200 - Profit (Loss) for the year (+/-)</i>	47,702	80,393
Total liabilities and shareholders' equity		13,012,224	12,714,075



ANNEXES

RECONCILIATION BETWEEN THE RECLASSIFIED INCOME STATEMENT AND THE STATUTORY INCOME STATEMENT

Reclassified income statement items	Statutory income statement items	31/12/2024	31/12/2023
	Item 10 - Interest income and similar revenues	524,356	503,764
	Item 10 - Interest income and similar revenues	524,463	503,978
	+ Item 80 (partial) - Net profit (loss) from trading	-107	-214
	Item 20 - Interest expense and similar charges	-227,356	-232,352
	Item 20 - Interest expense and similar charges	-227,356	-232,352
Net interest margin		297,000	271,412
Net fees and commissions		70,785	96,102
	Item 40 - Fee and commission income	176,875	174,987
	Item 40 - Fee and commission income	179,722	177,954
	- Item 40 (partial) - Securitisation servicing	-2,888	-3,015
	+ Item 230 (partial) - Other operating income (fast-track facility fee income)	41	48
	Item 50 - Fee and commission expense	-106,090	-78,885
	Item 50 - Fee and commission expense	-106,090	-78,885
Net profit (loss) from trading, from hedging, from other financial assets and liabilities measured at fair value through profit or loss, gains (losses) on disposal/repurchase of financial assets and liabilities, and net adjustments to/recoveries on credit risk on financial assets		103,894	65,671
	Item 80 - Net profit (loss) from trading	91,029	71,570
	Item 80 - Net profit (loss) from trading	90,922	71,356
	- Item 80 (partial) - Net profit (loss) from trading	107	214
	Item 90 - Net profit (loss) from hedging	1,256	1,652
	Item 100 - Gains (losses) on disposal or repurchase of:	17,628	2,395
	Item 100 a) - Gains (losses) on disposal or repurchase of financial assets measured at amortised cost	4,035	667
	Item 100 a) (partial) - Profit on bonds: AC	4,035	1,363
	Item 100 a) (partial) - Gains/losses on disposal of tax receivables	0	-696
	Item 100 b) Financial assets measured at fair value through other comprehensive income	14,742	491
	Item 100 b) Financial assets measured at fair value through other comprehensive income	14,742	491
	Item 100 c) Financial liabilities	-1,149	1,237
	Item 130 - Net adjustments to/recoveries on credit risk on:	89	2,089
	Item 130 b) Financial assets measured at fair value through other comprehensive income	89	2,089
	Item 110 - Net profit (loss) from other financial assets and liabilities measured at fair value through profit or loss	137	-8,978
	Item 110 a) Financial assets and liabilities designated at fair value	109	123
	Item 110 b) Other financial assets mandatorily measured at fair value	28	-9,101
	Item 170 b) (partial) Other net provisions	-6,245	-3,057
Dividends and similar income		10,387	10,335
	Item 70 - Dividends and similar income	10,387	10,335



ANNEXES

Other operating expenses/income		8,028	41,825
	<i>Item 230 - Other operating expenses/income</i>	36,881	67,840
	- <i>Item 230 (partial) - Other operating expenses (amortisation of expenses on leasehold assets)</i>	1,078	1,022
	- <i>Item 230 (partial) - Other operating income (recoveries of expenses)</i>	-30,052	-27,182
	- <i>Item 230 (partial) - Other operating expenses (maintenance of civil buildings)</i>	162	193
	- <i>Item 230 (partial) - Other operating income (fast-track facility fee income)</i>	-41	-48
Gross banking income		490,094	485,345
Gains (losses) on disposal of financial assets measured at amortised cost		-22,194	-41,896
	<i>Item 100 a) - Gains (losses) on disposal or repurchase of financial assets measured at amortised cost</i>	-18,159	-41,229
	- <i>Item 100 a) (partial) - Profit on bonds: AC</i>	-4,035	-1,363
	- <i>Item 100 a) (partial) - Gains/losses on disposal of tax receivables</i>	0	696
Net adjustments for credit risk to financial assets measured at amortised cost		-96,938	-66,278
	Item 130 a) Financial assets measured at amortised cost	-96,938	-66,278
Profits/losses from contractual changes without derecognition		215	-309
	Item 140 - Profits/losses from contractual changes without derecognition	215	-309
Net banking income		371,177	378,862
Operating costs		-277,248	-273,483
Personnel expenses		-147,117	-140,468
	<i>Item 190 a) - Personnel expenses</i>	-149,846	-142,980
	+ <i>Item 190 b) (partial) - Other administrative expenses (directors and statutory auditors)</i>	2,729	2,512
Other administrative expenses		-104,674	-108,865
	<i>Item 190 b) - Other administrative expenses</i>	-134,723	-136,177
	+ <i>Item 200 (partial) - Other operating income (recoveries of expenses)</i>	30,052	27,182
	+ <i>Item 200 (partial) - Other operating expenses (maintenance of civil buildings)</i>	-162	-193
	- <i>Item 160 b) (partial) - Other administrative expenses (directors and statutory auditors)</i>	-2,729	-2,512
	+ <i>Item 40 (partial) - Securitisation servicing</i>	2,888	3,015
Net adjustments to property, plant and equipment/intangible assets		-25,457	-24,330
	<i>Item 210 - Net adjustments to/recoveries on property, plant and equipment</i>	-16,886	-15,863
	<i>Item 220 - Net adjustments to/recoveries on intangible assets</i>	-7,493	-7,445
	+ <i>Item 200 (partial) - Other operating expenses (amortisation of expenses on leasehold assets)</i>	-1,078	-1,022
Gross operating profit		93,929	103,379
Net allocations to provisions for risks and charges		-15,614	-3,556
	<i>Item 200 - Net allocations to provisions for risks and charges</i>	-21,859	-6,613
	- <i>Item 200 b) (partial) - Other net provisions</i>	6,245	3,057
Other non-recurring income/charges		-270	57
	<i>Item 280 - Gains (losses) on disposal of investments</i>	-270	57
Profit before tax from continuing operations		78,045	99,880
Taxes		-26,816	-20,841
	<i>Item 300 - Tax expense (recovery) on income from continuing operations</i>	-26,816	-20,841
Profit from continuing operations		51,229	79,039
Profit for the year		51,229	79,039



ANNEXES

Country-by-country reporting**Country-by-country reporting (CRD IV) as at 31 December 2024
Cassa di Risparmio di Asti Group**

In order to increase the confidence of citizens in the European Union in the financial sector, Article 89 of the CRD IV (Directive 2013/36/EU) introduces obligations to publish information regarding the bank's activities, and specifically, the profits made, the taxes paid and any government grants received, broken down by country in which the bank operates.

Those obligations should be considered an important element of banks' social responsibility to the public.

The information may be published as an attachment to the financial statements or on the company website.

The following disclosure must be published annually:

- a) Names of the companies based in the country and nature of their business
- b) Turnover ⁽¹⁾
- c) Number of full-time equivalent employees ⁽²⁾
- d) Profit or loss before tax
- e) Tax on profit or loss
- f) Government grants received

Notes

- (1) The term "turnover" refers to the total net interest and other banking income as recorded in item 120 of the income statement of bank financial statements (see Circular 262/2005 of the Bank of Italy).
- (2) The term "Number of full-time equivalent employees" refers to the ratio between the total number of hours worked by all employees, excluding overtime, and the total annual number of hours contractually required of full-time employees.


Country of establishment: Italy

Name of the company and nature of business

As at 31 December 2024, the "Cassa di Risparmio di Asti Banking Group" was composed as follows:

- Cassa di Risparmio di Asti S.p.A. or, in short, Banca di Asti (Parent Company), with registered office in Piazza Libertà 23 – 14100 – Asti (AT);
- Pitagora S.p.A., with registered office in Corso Marconi 10 – 10125 - Turin (TO);
- Immobiliare Maristella S.r.l., with registered office in Piazza Libertà 23 – 14100 – Asti (AT) (operating asset);
- We Finance S.p.A., with registered office in Via Vitruvio 42 - 20124 - Milan (MI).

The Cassa di Risparmio di Asti Group's business is conducted exclusively in Italy.

The Group mainly conducts banking activities of funding and lending, as well as the provision and intermediation of payment services, insurance services (both life and non-life businesses, based on agreements with leading insurance companies) and health insurance (through a service for households, operating as part of medical and healthcare benefits).

The offer is traditionally targeted to individual investors and SMEs (artisans, retail and wholesale companies, agricultural and industrial companies), without excluding large leading companies operating on their reference markets, supported by a geographical network comprised of 209 branches, of which 176 in Piedmont, 23 in Lombardy, 5 in Veneto, 3 in Valle d'Aosta and 2 in Liguria, as well as the option for customers to access the services that can be used through e-banking and the POS and ATM networks. Pitagora S.p.A. grants salary/pension-backed loans and has 86 branches throughout the country.

Turnover

As at 31 December 2024, the turnover amounted to € 468,875 thousand, all earned in Italy.

Number of full-time equivalent employees

As at 31 December 2024 there were 1,811 full-time equivalent employees, of which 1,685 with a full-time contract. Of this total, 1,570 were in service with the Parent Company, 233 with Pitagora S.p.A. and 8 with We Finance S.p.A.

Profit before tax

As at 31 December 2024 the profit (loss) before tax from continuing operations amounted to € 78,045 thousand. There are no components regarding discontinued operations.

ANNEXES

Income taxes

As at 31 December 2024, the item 'income taxes for the year' showed a negative balance of € 28,816 thousand.

Government grants received from Fondo Banche Assicurazioni

During 2024, the Group received grants for carrying out personnel training for a total of € 773 thousand.

In this regard, note that, in compliance with the provisions set out for preparing the disclosure in question, this category of contributions excludes transactions conducted with central banks for the purpose of financial stability and transactions performed with the objective of facilitating the transmission mechanism of monetary policy.