



# 2024 Non-financial statements

## Sustainability report

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# General Information

ESRS 2: General Disclosures

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## ESRS 2

# General Disclosures

## BASIS FOR PREPARATION OF THE REPORT [BP-1]

Caja Rural de Navarra Group (CRN Group) has prepared this Sustainability Report using a comprehensive and transparent approach that aims to provide a clear and detailed view of our sustainability practices and outcomes.

The report has been drafted mainly with the CSRD (Corporate Sustainability Reporting Directive) in mind, to ensure it complies with the latest standards in the field of non-financial reporting and sustainability. It therefore takes into account the requirements set out in the corresponding Delegated Regulation, which contains the European Sustainability Reporting Standards (ESRS), developed by the European Financial Reporting Advisory Group (EFRAG). These standards provide a structured and detailed basis for sustainability disclosures, ensuring consistency and comparability of reporting at European level.

The Report is structured according to the principles established by the Directive, which requires entities to report on key aspects of environmental, social and governance (ESG) issues, ensuring all

disclosures are accurate, consistent and aligned with international standards.

However, as the CSRD had not yet been fully transposed into Spanish Law at the time of drafting, Caja Rural de Navarra has followed the recommendation, issued in a joint communiqué by the Spanish Securities Market Commission (CNMV) and the Spanish Accounting and Auditing Institute (ICAC), that Spanish entities subject to the CSRD should publish their reports on the basis of the CSRD, while also complying with the disclosure requirements under current regulations, and so has also taken other additional regulations into consideration to ensure consistency and proper compliance in the process of preparing the report.

Accordingly, it also considered applicable regulations that complement and ensure compliance with the disclosure requirements. The first of these is Spanish Law 11/2018, which regulates the disclosure of non-financial information, setting out the principles and criteria for reporting environmental, social and governance practices in a transparent and consistent manner. The second is Spanish Law 22/2015, of 20 July, on Auditing, which establishes the procedures and requirements for conducting audits, ensuring that the financial and non-financial information presented by entities is reliable, verifiable and complies with established standards. These regulations provide an additional framework that supports and complements the CSRD guidelines for the reporting process.

Also considered were the disclosure requirements of Commission Delegated Regulation 2178/2021, implementing Article 8 of the European Taxonomy Regulation 852/2020, plus subsequent delegated regulations, such as Regulation 2139/2021, Regulation 1214/2022 and Regulation 2486/2023. In this way, the report seeks to guarantee compliance with the most relevant regulations and to ensure the transparency and reliability of the information provided.

The basis for this report includes a comprehensive analysis of our operations and their impact on our stakeholders, with a particular focus on how our activities affect the environment, local communities and our employees. We also view regulatory compliance as a fundamental pillar of our business model and make sure all our practices are aligned with current regulations and meet the expectations of regulators.

Caja Rural de Navarra Group has introduced a series of internal processes to ensure the relevance and quality of the data collected. These include processes for compiling information from key organizational areas such as risk management, data protection and corporate governance. Areas are analysed in depth to identify not only risks that may arise, but also opportunities to continuously improve our contribution to sustainable development.

Furthermore, Caja Rural de Navarra Group's CSRD report is based on the integration of materiality criteria, which means we make sure the issues

reported are relevant and significant for the Group and its stakeholders. This includes identifying the environmental impacts derived from our activities and the social practices we engage in to promote inclusion and well-being in the communities where we operate.

## Scope of Consolidation of the Report

This section defines the scope of the information reported by Caja Rural de Navarra Group, specifying the entities and activities that form part of the consolidated Group and whose sustainability has been assessed. It details the subsidiaries included in the report and any entity outside the scope of consolidation whose data may be relevant to the Group's environmental, social and governance (ESG) performance.

In this regard, Caja Rural de Navarra, S.Coop. de Crédito ("Caja Rural de Navarra", "the Caja", "Caja Rural" or "the Bank") is the parent entity of the Group ("Caja Rural de Navarra Group", "CRN Group" or "the Group"). The table below lists its subsidiaries, all wholly owned, at 31 December 2024:

Company	Region
Cereal sector	
ESPIGA I&D ALIMENTARIA, S.L.	Building a technology centre in 2024
HARIVENASA	Spain, exports to twenty countries
EXPLOTACIÓN AGRÍCOLA LAS LIMAS, S.L.	Rice cultivation
Winery services sector	
INDUSTRIA TONELERA DE NAVARRA	Spain
TONNELLERIE DE L'ADOUR	Global
MERRANDERIE D'ADOUR	France
BOUQUET BRANDS	Navarre
BAHIA DE CADIZ	Cadiz
Senior care services sector	
CARE HOME	Navarre
SOLERA NAVARRA	Navarre
TORRE MONREAL	Navarre
SERESGERNA	Navarre
Caja Rural customer support sector	
Informes y Gestiones Generales, S.A.	Navarre, Rioja, Basque Country
Informes Técnicos y Valoraciones Generales, S.L.	Navarre, Rioja, Basque Country
PROMOCION ESTABLE DEL NORTE	Navarre, Rioja, Basque Country
PREVENTIA SPORT	Navarre

In addition to these wholly-owned subsidiaries, Caja Rural de Navarra also holds joint and non-controlling equity investments in a number of sectors.

It should be borne in mind that the Bank's equity investments are stable. Historically, there have been investments and divestments, but the purpose of this activity is not speculative and many of the investee companies have been consolidated by CRN for more than twenty years.

In line with the above, the scope of this report covers the parent company, Caja Rural de Navarra, as well as all the investee companies over which it exercises effective control, i.e. those in which it holds a stake of more than 50%. This scope of application coincides fully with the Group's accounting consolidation scope, thus guaranteeing consistency and comparability between the financial information and the sustainability information reported.

## CROSS-CUTTING ISSUES IN PREPARING THE REPORT [BP-2]

In the interests of transparency and clarity on the preparation of the sustainability report, note that, in compliance with the provisions of BP-2 Disclosures in relation to specific circumstances, the information required in this section has been included in a cross-cutting manner throughout this report.

Specifically, this General information section includes answers to questions about the strategy and business model of Caja Rural de Navarra Group and about its value chain, which will be set out in detail below.

Time horizons have been defined mainly in the Environmental information section, which includes the estimates, targets and deadlines relevant to climate change action and the calculation of the carbon footprint.

Finally, it is important to note that no material errors have been detected in the information reported in the Group's sustainability reports published in previous years.

## GOVERNANCE

### GOV-1: THE ROLE OF ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

EBA Guidelines on internal governance [EBA/GL/2021/05] require that the Governing Board of Caja Rural assumes ultimate and overall responsibility for the Group and defines, oversees and is accountable for the implementation of the governance arrangements within the institution that ensure its effective and prudent management.

In line with the Bank's ongoing commitment to best corporate governance practice, the Governing Board of Caja Rural de Navarra, has defined a System for Internal Governance for Caja Rural de Navarra (the "System"). Its implementation and development are overseen by the Governing Board with the support of its delegated committees.

The System has the following aims:

- To promote transparent, independent, effective and prudent management of both the Bank and the CRN Group, complying at all times with the requirements set by regulators and supervisors;
- To clearly define the allocation of responsibilities and competencies within the internal control

framework, including functions related to internal control and audit.

- To ensure that decisions are taken with adequate information and always in the interests of the Bank and its members, and to ensure that the interests of investors, customers, employees and other stakeholders are protected.

In order to ensure prudent and responsible management of the Bank, the System and the policies and procedures underpinning it are grounded in a number of key principles:

- Promoting efficient and organised functioning of the Governing Board in coordination with its Committees. The stated core mission of the Governing Board is to represent, administer, manage and control the Bank and CRN Group. It is therefore responsible for reviewing and steering corporate strategy, the most important action plans, risk policies, annual budgets and plans, setting targets, overseeing their implementation and achievement in the corporate sphere and delegating day-to-day management of the Bank to the Management team.
- Defining appropriately the essential bases of the structure, organization and functioning of the Group, guaranteeing efficient strategic coordination.
- Establishing a robust system of supervision and internal control, as part of the corporate governance System, based on a defined framework for relations between the Bank's governance bodies and Management.
- Commitment to transparency, by defining a System based on clear, transparent and documented decision-making processes.

- Embedding a corporate culture based on an ethical and sustainable approach by the Bank's governing bodies, control units, management and employees.
- Compliance and application of best practice in governance, ensuring that the Bank complies at all times with applicable law and implements best practice in governance, including all current and future international standards approved by competent authorities and applicable to the Bank and the CRN Group.

## 1. Governing bodies

Caja Rural de Navarra Group has an organizational structure and an operating model for management and control that is appropriate, transparent and geared towards efficient action, while complying with the principles of good corporate governance. One of the essential functions of the Governing Board is to make sure this structure is aligned with the Bank's business and risk management model. To this end, the Board periodically assesses the organization and any changes to it, analysing how these affect both the Bank and the CRN Group, and adjusting its structure and functioning where necessary.

The governance model of the Bank and the CRN Group also includes internal management bodies, the top level of which is the Managing Director, supported by the Management Committee. The Managing Director acts as the permanent channel for relations and communications between the Governing Board and the executive tier of the Bank, made up of senior management.

### GOVERNING BODIES OF CAJA RURAL DE NAVARRA GROUP.





Members of governing bodies by age and gender.

		Governing Board		Management Committee		Audit Committee		Appointments Committee		Remuneration Committee		Risk Committee
> 50	2023	11	4	5		4		3		3		3
	2024	11	4	5		4		3		3		3
30-50	2023	2		-		-		-		1		-
	2024	2		-		-		-		1		-
< 30	2023	-		-		-		-		-		-
	2024	-		-		-		-		-		-

Men Women

## A. GENERAL MEETING

Caja Rural de Navarra is a cooperative bank with 190,930 members at 31/12/2024, contributing EUR 261.1 million to the Bank's share capital. The number of members rose by 4,937 since the previous year and the contribution to capital rose by EUR 18.1 million.

The General Meeting, constituted by the members or their representatives, is the supreme decision-making body for Caja Rural de Navarra. The General Meeting is held following a system of Preparatory Meetings. Members, whether individuals or legal entities, take part in Meetings via delegates appointed at the Preparatory Meetings and cannot reserve the right to attend the General Meeting in person.

## B. GOVERNING BOARD

The Governing Board of Caja Rural de Navarra is the Bank's highest decision-making body, except in matters reserved by law or Articles of Association to the General Meeting. It acts on a collegiate basis with support from its Committees and focuses on setting strategic and management guidelines and the supervision and control of the day-to-day ongoing management, which is exercised by senior Management, to make sure the Group is being run prudently and effectively.

As the governing, management and representative body, the Governing Board is responsible for high-level management, supervision of management and representation of the co-operative bank, as

well as for setting the general guidelines for action and exercising all powers not legally reserved to other corporate bodies.

The Governing Board has the power to approve the general policies of the Bank, defining guidelines for action in its different management areas, overseeing their implementation and establishing the necessary systems for communication and information exchange. It also defines the internal governance framework of the Bank and CRN Group, which it keeps under constant review to ensure good coordination between the various levels of management responsibility.

Members of the Governing Board are chosen from among the Cooperative's members according to the procedure set out in articles 44 and 45 of

the Bank's Articles of Association. The Board is made up of a minimum of 5 and a maximum of 15 members: Chairman, Vice-Chairman, Secretary and up to 12 other Board members. The members, except for the employee representative, are elected by the General Meeting by secret ballot. Of the other Board seats, 11 are assigned to the different regions where the Bank operates so that each has a member from their region on the Governing Board. The composition of the Governing Board of Caja Rural de Navarra, at 31 December 2024, is as follows<sup>1</sup>:

<sup>1</sup> Governing Board: <https://www.cajaruraldenavarra.com/sites/default/files/gobiernocooperativo/consejo-rector.pdf>

## Governing Board

**Ignacio Terés Los Arcos**  
**PRESIDENT** / Non-Executive

**Pedro Jesús Irisarri Valencia**  
**VICE-PRESIDENT** / Independent

**Marcelino Etayo Andueza**  
**SECRETARY** / Independent

**Fermín Esandi Santesteban**  
**VOCAL 1** / Non-Executive

**Beatriz Díaz de Cerio Martínez**  
**MEMBER 2** / Independent

**Ignacio Zabaleta Jurío**  
**MEMBER 3** / Non-Executive

**Ainhize Muratori Irurzun**  
**MEMBER 4** / Independent

**Pedro José Goñi Juamperez**  
**MEMBER 5** / Independent

**Gabriel Urrutia Aicega**  
**MEMBER 6** / Independent

**José Joaquín Rodríguez Eguílaz**  
**MEMBER 7** / Independent

**Jesús María del Castillo Torres**  
**MEMBER 8** / Independent

**Alberto Arrondo Lahera**  
**MEMBER 9** / Independent

**Carlos Sánchez Diestro**  
**MEMBER 10** / Independent

**Ana María Eizaguirre Larrañaga**  
**MEMBER 11** / Non-Executive

**Alatz Salvatierra Echeverría**  
**MEMBER 12** / Workers' Representative

All members of the Governing Board are non-executive members and 11 are independent.

The members of the Governing Board must be persons of good commercial and professional repute, with the knowledge, skills and experience to perform their duties with honesty, integrity and independence. In addition, the Bank regularly reassesses the suitability of its members, both individually and collectively, to ensure that their skills and experience remain aligned with the principles of good governance and good management. The selection of Board members also takes into account the principles of gender equality and opportunity to encourage a diversity of views and experience.

The Board has rules of procedure that govern its functions, the composition and workings of its Committees and codes of conduct for its members. These rules establish key principles such as diligence and loyalty and include rules on non-competition, disclosure and recusal in cases of conflict of interest. They also regulate directors' remuneration, ensuring it is compatible with proper and effective risk management and aligned with the Group's long-term interests and strategic values.

The Governing Board may not delegate powers reserved to its sole competence by law, the Articles of Association or its own rules, nor may it delegate other powers necessary for the responsible exercise of its general supervisory function.

Regarding the latter, the Governing Board undertakes, in particular, to directly exercise the following functions<sup>1</sup>:

- Determining the general policies and strategies of the Bank.

- Exercising responsibility for the Bank's administration and management, the approval and oversight of the implementation of its strategic objectives, risk strategy and internal governance.
- Regular monitoring, control and review of the effectiveness of the corporate governance system, as well as the adoption of appropriate measures to remedy any deficiencies.
- Establishing and overseeing an adequate and effective framework of internal governance and control, compliant with regulations in force, to prevent money laundering and terrorist financing.
- Supervising the effective functioning of any committees it sets up and the performance of any delegated bodies it appoints, and effective oversight of senior management.
- Its own organization and functioning.
- Authorising or waiving obligations arising from the duty of loyalty in accordance with the law.
- Decisions regarding directors' remuneration, within the framework of the Articles of Association and the remuneration policy approved by the General Meeting.
- Preparing the annual financial statements and presenting them to the General Meeting.
- Drawing up any kind of report that the law requires of the Governing Board, where the matter addressed by the report cannot be delegated.
- Appointing and dismissing executives who report directly to the Governing Board or to any of its members, setting the basic terms and conditions of their contracts, including remuneration, and, in particular, appointing, hiring and, where appropriate, dismissing the Managing Director.
- Convening the General Meeting and drawing up of the agenda and proposed resolutions.
- Any acquisition of contributions-in-kind by the Bank.
- Powers delegated by the General Meeting to the Governing Board, unless the General Meeting has explicitly authorised their sub-delegation.
- Ensuring the integrity of accounting and financial reporting systems, including financial and operational control and compliance with applicable law.
- Overseeing the process of information disclosure and communications about the Bank, and setting policies for informing and communicating with customers and the public.
- Approving any kind of large or special transactions that are strategic in nature or involve a special tax risk, including the disposal of key Bank assets and major corporate transactions, unless their approval is reserved to the General Meeting.
- To maintain the proper independence of those responsible for internal control functions, the appointment, re-election and removal of the Head of Internal Audit and Head of Regulatory Compliance, both on the proposal of the Audit Committee, and the Head of the Risk

<sup>1</sup> Governing Board rules of procedure (in Spanish): <https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/reglamento-consejo-crn-feb-22.pdf>



Management Unit, on the proposal of the Risk Committee, shall be carried out. In all these cases, the Appointments Committee needs to assess and approve the candidate's suitability in advance.

Caja Rural de Navarra Group has a Director Selection and Diversity Policy, which sets the conditions and criteria to be considered when selecting any individual or a legal entity to fill a seat on the Governing Board. This policy aims to ensure that the selection of Board members is transparent, objective and aligned with the principles of diversity and inclusion, so that Board members come with the knowledge, experience and skills necessary for the effective performance of their duties. In addition, the policy promotes balanced representation and the inclusion of diverse perspectives on the governing body, contributing to sounder decision-making consistent with the Group's values.

The fundamental principles governing Caja Rural de Navarra Group's Director Selection and Diversity Policy are as follows:

1. The members of the Governing Board of GRUPO CAJARURALDENAVARRAS.COOP. must be persons:
  - of good commercial and professional repute: this means their record of personal, business and professional conduct leaves no doubt as to their ability to manage the Group in a sound and prudent manner.
  - with the appropriate knowledge and experience to carry out their future duties, particularly in the areas of banking and financial services. On this point, positive weighting is given to studies in subjects specifically related to finance or the cooperative sector, and relevant practical experience from previous occupations during a

significant time period. As a rule, professional experience and knowledge acquired through professional or work experience will be weighted above qualifications, so candidates can offset a lack of training with the right professional experience. In these cases, additional specially tailored training may be given to the candidate concerned.

- in assessing professional experience, positive weighting is given to the exercise of functions and activities related to finance and security markets, executive and management positions in cooperatives, trading companies or other entities and their scale, the complexity of tasks under their responsibility, relationships with the cooperative sector, and the time spent exercising all these functions.
  - must be in a position to exercise good governance in the Group, acting at all times with honesty, integrity and independence of ideas in the exercise of their functions, and able to dedicate sufficient time to carry out their functions and responsibilities within the Governing Board.
2. Caja Rural de Navarra Group's core principle is to guarantee independent thinking by all members of its Governing Board, so they can make and issue sound, objective and independent decisions and opinions in the performance of their duties and responsibilities. The selection process therefore assesses whether candidates have the necessary aptitudes and are free of conflicts of interest, or, where applicable, can manage such conflicts so they do not affect decision-making.
  3. Caja Rural de Navarra Group will ensure that the Governing Board as a whole has, at all times, the appropriate knowledge, skills and experience to be

able to understand the Group's activities, including the main risks.

## 2. Delegated Bodies

The Governing Board can delegate powers on a case by case basis and, where permitted by the Bank's Articles of Association, set up Executive and Joint Committees. It is also supported in the exercise of its powers by a number of specialised internal committees. These Committees have no executive functions but facilitate the decision-making process, providing a space where members can discuss issues in an objective and constructive manner, bringing in different critical opinions and perspectives to help enrich decision-making.

Specifically, Caja Rural de Navarra has the following committees: Audit Committee, Risk Committee, Appointments Committee and Remuneration Committee, with powers to submit reports, offer advice and make proposals. The main purpose of these committees is to assist the Governing Board in the exercise of its supervisory functions in specific areas, supporting the development of a robust, comprehensive and effective internal governance framework. They are also responsible for advising, preparing and, where appropriate, proposing decisions to be taken by the Governing Board, making sure decisions are well founded and aligned with the Group's interests.

Through their Chairmen, the Committees report to the Governing Board on the exercise of their respective supervisory functions, ensuring constant and fluid communication. Minutes of their meetings are made available to all members of the Governing Board, ensuring transparency and access to relevant information at all times.

## A. MANAGEMENT COMMITTEE

The Management Committee is a statutory body delegated by the Governing Board to provide more agile decision-making on any matter within the Board's remit except those that cannot be delegated by Law.

## B. AUDIT COMMITTEE

The Audit Committee is a statutory body delegated by the Governing Board to oversee the internal audit services, understand the financial reporting process and internal control systems and oversee compliance with codes of conduct and the Bank's Compliance rules. It is governed by its own Regulations<sup>2</sup>.

The functions of the Audit Committee include the following:

- The supervision of the adequacy, suitability and effective functioning of the Bank's internal control and assessment system and legal compliance with matters under the Committee's remit.
- Oversight of Internal Audit.
- Supervision of the Bank's regulatory compliance, notably ensuring that internal Codes of Ethics and Conduct meet regulatory requirements and are appropriate to the Bank. The Committee also exercises special control and supervision over compliance with and execution of the measures in the Bank's Criminal Compliance Management System Handbook.
- Supervision of the work of the Statutory Auditor.

<sup>2</sup> <https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/2022.02.14-reglamento-comite-de-auditoria-def-02-2022.pdf>

- Supervision, preparation and dissemination of the Bank's economic and financial information.
- Any other functions specifically assigned to it by law or regulation, or by decision of the Governing Board.

For further details of the functions and composition of the Audit Committee, see the Audit Committee Regulations, available in Spanish in the Corporate Governance section of the Caja Rural de Navarra website.

### C. RISK COMMITTEE

The Risk Committee is a delegated body of the Governing Board. It advises the Board on management and supervision of all material risks and on correct application of the global risk appetite in light of the Bank's strategy.

The Risk Committee has the following functions in overseeing risk management and control <sup>3</sup>:

- To advise the Governing Board on the Bank's current and future global risk appetite and its risk strategy, and to support it in monitoring implementation of that strategy. The Governing Board nevertheless retains responsibility for the risks assumed by the Bank.
- To take part in the ex-ante analysis and support the Governing Board on all matters related to the Risk Appetite Framework and Recovery Plan.
- Oversight of Risk Management Policy.
- Review, at least annually, the most significant financial and non-financial risks, assess

the level of risk tolerance and propose any necessary adjustments to the Board.

- Check that the pricing policy for assets and liabilities offered to customers fully reflects the Bank's business model and risk strategy. If not, the Risk Committee submits a remedial plan to the Governing Board.
- To assess the risks associated with the financial products or services offered by the Bank and check that pricing is consistent with profitability.
- To monitor the execution of strategies for managing capital, liquidity, and any other relevant risks for the Group, including legal, technological, reputational, environmental, social and governance risks, in order to assess they align with the approved strategy and risk appetite.
- Recommend to the Governing Board any adjustments to the risk strategy deemed necessary as a result of, inter alia, changes in the Group's business model, market developments or recommendations made by the Group's Risk Management function.
- To determine, in consultation with the Governing Board, the nature, quantity, format and frequency of risk information to be submitted to the Committee and Governing Board.
- To collaborate in the establishment of sensible remuneration policies and practices. To this end, the Risk Committee reviews, without impinging on the functions of the Remuneration Committee, whether the incentive policy in the

remuneration system takes due account of risk, capital, liquidity and the probability and opportunity of profits.

- Any other function specifically assigned to it by law or regulation, or by decision of the Governing Board.

For further details of the functions and composition of the Risk Committee, see the Risk Committee Regulations, available in Spanish in the Corporate Governance section of the Caja Rural de Navarra website.

### D. APPOINTMENTS COMMITTEE

The Appointments Committee is a delegated body of the Governing Board. It identifies candidates for the Governing Board, assesses the suitability of its members and the balance of knowledge, skills, diversity and experience of the Board as a whole. It also sets targets for improving the representation of the gender least represented on the Board.

The main functions of the Appointments Committee are <sup>4</sup>:

- To assess the balance of knowledge, skills, diversity and experience of the Governing Board and prepare a description of the duties and skills required for a particular appointment, including the expected time commitment required, and report back to the Governing Board.
- To estimate the time required by members of the Governing Board to carry out their duties and responsibilities.

- Periodically, and at least once a year, to review the structure, size, composition and performance of the Governing Board, making recommendations to the Governing Board as it deems appropriate.
- To assess the suitability of the members of the Governing Board, the Managing Director or similar roles and those responsible for internal control functions and other key positions of the Bank (the "Subject Persons"), in accordance with Royal Decree 84/2015, of 13 February, implementing Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions, particularly whenever a circumstance that may affect their suitability for their role comes to light.

Likewise, the Committee shall periodically, and at least once a year, assess the suitability of the various members of the Governing Board and of the Board as a whole, and report back to the Governing Board.

- Propose persons who, in addition to those expressly included in the Group's "Internal Regulations on the Assessment of the Suitability of Directors and Key Personnel", may be considered to be Subject Persons in accordance with Law 10/2014, Royal Decree 84/2015 and Bank of Spain Circular 2/2016.
- To determine initial and periodic training programmes for members of the Governing Board. The Committee also draws up an "Onboarding Programme", provided to all Members when they first take office, which includes all information which, in the Committee's opinion, the Director needs to be aware of to properly perform his or her duties.

<sup>3</sup> <https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/reglamento-del-comite-de-riesgos-caja-rural-de-navarra-feb2022.pdf>

<sup>4</sup> <https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/reglamento-comite-de-nombramientos-31012022.pdf>

The minimum content of the "Onboarding Programme" is attached as Annex I to these Regulations and is aligned with the supervisor's expectations in this area.

- To propose to the Governing Board any amendments to these Regulations or to the Group's "Internal Regulations on the Assessment of the Suitability of Directors and Key Personnel".
- To ensure compliance with any incompatibilities regime that may be imposed by law at any time applicable to positions held by the members of the Governing Board.
- To determine and periodically review the categorization of members.
- To identify and recommend individuals for approval as candidates by the Governing Board and for election by the General Meeting to fill vacancies on the Governing Board.
- To set a target for representation of the gender least represented on the Governing Board and develop guidance on how to raise their numbers to reach this target.
- To consider the objectives of the diversity policy.
- To act as a channel of communication with the competent regulatory authorities on assessment of suitability.
- Any other functions that may be assigned to it in these Regulations or by decision of the Governing Board.

In performing its duties, the Appointments Committee, as far as possible and on an ongoing basis, should seek to ensure that the decision-making of the Governing Board is not dominated by one individual or a small group of individuals in a way that is detrimental to the interests of the Group as a whole.

For further details of the functions and composition of the Appointments Committee, see the Appointments Committee Regulations, available in the Corporate Governance section of the Caja Rural de Navarra website.

## E. REMUNERATION COMMITTEE

The Remuneration Committee is a delegated body of the Governing Board. It proposes the general remuneration policy to the Governing Board, carries out an independent annual review of its application and reports on the remuneration policy for executives classed as "identified staff".

The main functions of the Committee in the area of remuneration are<sup>5</sup>:

- To define remuneration policy for the Group and for the Governing Board, considering the long-term interest of the Bank and its stakeholders and to ensure remuneration policy is gender-neutral and supports equal treatment of employees.
- Each year, to issue a report assessing the general remuneration policy for Governing Board members, the individual remuneration and other contractual terms and conditions of any Governing Board members with executive functions, and the basic terms and conditions of senior management contracts, verifying that they comply with the remuneration guidelines

and procedures adopted by the Committee. This report is submitted to the Governing Board and, if appropriate, reported to the Bank's General Meeting.

The Committee also does preparatory work for decisions on remuneration to be taken by the Governing Board, including decisions with implications for the Bank's risk and risk management, taking into account the long-term interests of members, investors and other stakeholders in the Bank, as well as the public interest.

- To supervise the remuneration of the heads of the risk, audit, internal control and regulatory compliance functions, and that of highly paid employees whose professional activities have a material impact on the institutions' risk profile ("risk takers"), applying the principle of proportionality in view of the size, internal organization, nature and scope of activity of the Group.
- To report to the Governing Board on the implementation and correct application of the Bank's remuneration policy, confirming the policy is being complied with, remuneration is transparent and all necessary information is included in the corresponding reports (Annual Report, Corporate Governance Report, Information of Prudential Relevance, etc.). This involves reviewing the principles on which the policy is based and confirming it meets its objectives and accords with national and international regulations, standards and principles.
- To review whether any extraordinary long-term variable remuneration complies with the policy and principles.
- When the extraordinary long-term variable remuneration vests, to assess and confirm how far the performance targets for payment have been met.
- To propose to the Governing Board, which may then submit it to the General Meeting if appropriate, detailed recommendations setting out the reasons for and scope of the decision that the variable remuneration of risk takers should be more than one hundred per cent of the fixed component of each employee's total remuneration but less than two hundred per cent. The recommendation must state the number of persons affected and their positions, as well as the expected effect on the Bank's maintenance of a sound capital base.
- To assess the systems and processes in place to ensure that the remuneration system takes due account of all types of risks, levels of liquidity and levels of capital, and that the general remuneration policy promotes and is consistent with sound and effective risk management, and is in line with the business strategy, objectives, corporate culture and values, risk culture and long-term interests of the Group.
- To review the appointment of any external remuneration consultants that the supervisory function may hire to provide advice and support.
- To review various possible scenarios to analyse how remuneration policies and practices react to internal and external events, and to back-test the criteria used to determine vesting and ex ante risk adjustments in light of actual risk outcomes.

<sup>5</sup> [https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/2024\\_Anexo3\\_%20Reglamento-del-Comit%C3%A9-de-Remuneraciones.pdf](https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/2024_Anexo3_%20Reglamento-del-Comit%C3%A9-de-Remuneraciones.pdf)



- Any other functions that may be assigned to it in these Regulations or by decision of the Governing Board.

For further details of the functions and composition of the Remuneration Committee, see the Remuneration Committee Regulations, available in the Corporate Governance section of the Caja Rural de Navarra website.

## **F. GENERAL MANAGEMENT**

Caja Rural de Navarra is obliged to have a General Management body which, under the direct supervision of the Governing Board, forms the top tier of executive management. This management is responsible for the ongoing day-to-day management of the Bank, with the support of the Group's Management Committee and the heads of the different areas and departments. The purpose of this structure is to promote a balanced and appropriate framework of relations between the strategic management and the supervisory function of the Governing Board, ensuring that the competencies of the various areas and departments, reporting to the Managing Director, are managed effectively and in line with the Group's objectives.

The Management Committee of the Bank is a consultative body that advises the Managing Director and has no delegated or executive functions. It plays a key role in guiding and supporting operational decisions, but has no direct executive powers.

The Managing Director, who is the only senior management position in the Group, is appointed by and reports exclusively to the Governing Board. This role must comply with applicable regulations and the Bank's own "Internal Rules for the Suitability Assessment of senior management and

holders of key roles", including the requirements for commercial and professional good repute and the knowledge and experience required for the role.

In addition, the Appointments Committee is responsible for identifying and reviewing annually the holders of key roles within the Bank, ensuring that they also meet the requirements for reputation, knowledge and experience.

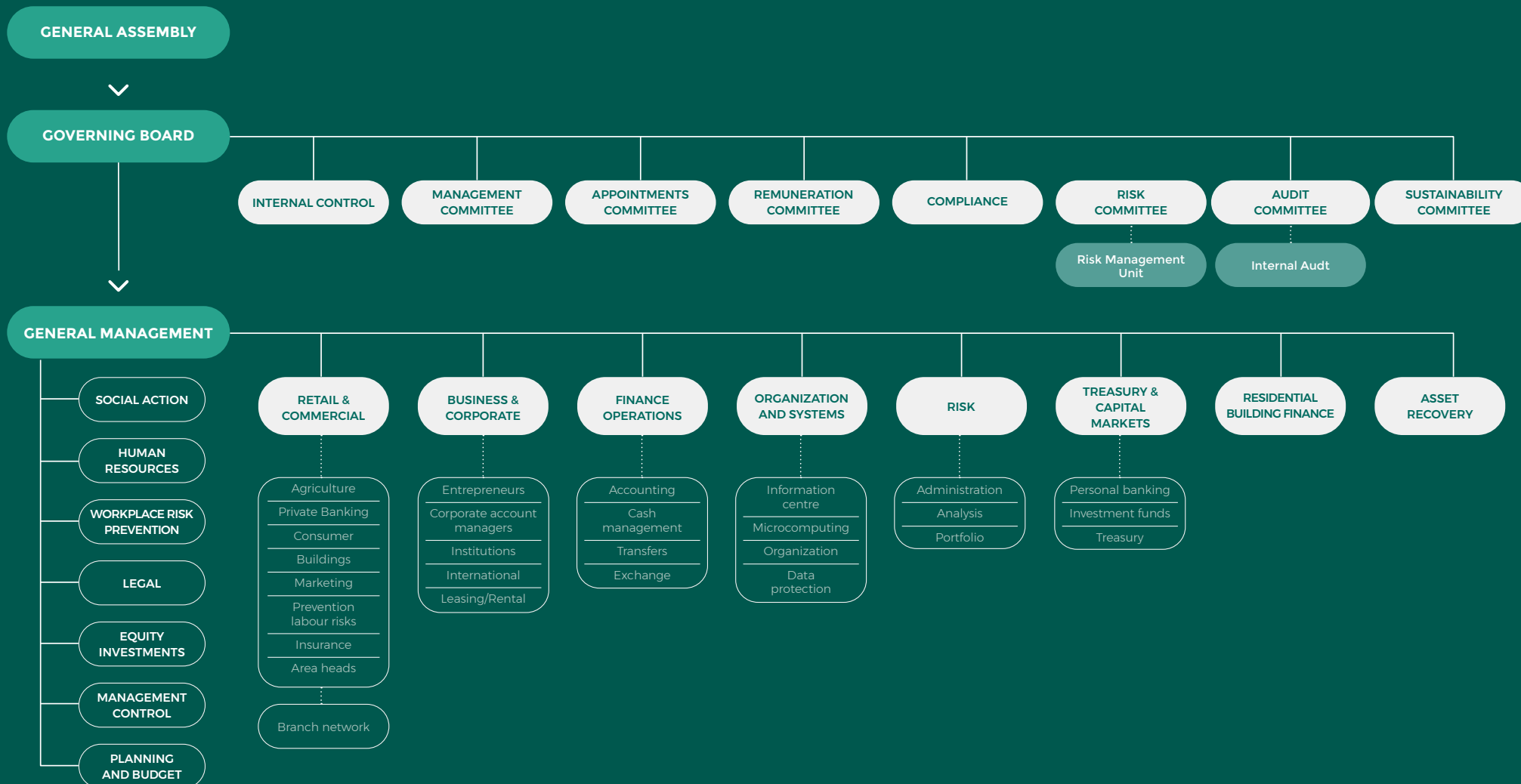
The governance structure of the Savings Bank is based on a clear and structured relationship between the Governing Board and day-to-day management run by the heads of the different areas of the Bank and CRN Group. The General Management is charged with managing all matters related to the day-to-day business of the Bank by exercising the powers and functions entrusted to it and set out in a public deed of power of attorney.

The Managing Director is required to submit the annual management report and annual financial statements to the Governing Board within three months of each financial year-end. These are then reported to the General Meeting for its consideration. He/she must also notify the Chairman of the Bank of any issue that he/she considers requires the convening of the Governing Board and/or General Meeting or whose relevance requires that it be made known to the governing bodies.

Overseen by the Managing Director, the Bank's structure is made up of various Internal Areas/Departments, which are the key way functional responsibilities are attributed within the organization. Within their fields of responsibility, these Internal Areas/Departments can decide, report on, consult, coordinate or propose on all issues within their fields of activity or relating to their internal or business areas.

Key areas include those responsible for corporate governance (such as the Legal and Tax Department), the Collections and Payments Department, and the business areas: Corporate Banking, Sales, Companies and Private Banking. In addition, the Bank has various internal units such as Human Resources, Organization and Technology, Risk Management, Management Control, Investees, Treasury and Markets, and Housing and Real Estate Assets.

The following is a summary of the Group's structure <sup>6</sup>:



<sup>6</sup> Organization chart: [https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/crn\\_rk\\_organigrama.pdf](https://www.cajaruraldenavarra.com/sites/default/files/gobierno-cooperativo/crn_rk_organigrama.pdf)

## G. GOVERNANCE BODIES IN SUBSIDIARIES

The companies in which Caja Rural de Navarra holds equity stakes have a range of governance bodies, designed to ensure they operate in the best possible way. These range from a Sole Director or two Co-Directors to, most frequently, a Board of Directors, generally with a small number of Directors.

The subsidiaries' Directors are linked to Caja Rural or its other subsidiaries. They are formally responsible for implementing Caja Rural's general policies in each investee company. However as investee companies frequently interact with the Bank's own departments in the everyday conduct of their business, especially in the case of the consolidated group, they naturally imbibe the Bank's shared values.

No Director receives financial or other consideration, per diems, pension plans or similar, being remunerated for their work in the Bank or subsidiary Company based on the classification of their position in accordance with the salary scales in this report.

There are no defined allowances for membership of the management bodies of subsidiaries.

The Co-operative Group, and the Bank within it, maintains a civil liability insurance policy for management positions, the scope of which covers the activity of these employees in their capacity as Directors of the investee companies.

## H. INFORMATION AVAILABLE ON THE WEBSITE

The Caja Rural de Navarra website describes in detail the Regulations, internal rules, organizational structure and sustainability policy, as well as the appointments and remuneration policies, at:

<https://www.cajaruraldenavarra.com/es/Gobierno-Corporativo-y-Politica-de-Remuneraciones>

### GOV-2: INFORMATION PROVIDED TO ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES AND SUSTAINABILITY ISSUES ADDRESSED BY THEM

For Caja Rural de Navarra Group, sustainability reporting is a central issue that is addressed systematically and in detail by the governance, management and supervisory bodies. During the reporting period, a rigorous process of reporting and assessment of sustainability impacts, risks and opportunities has been implemented, in order to ensure that decisions taken are aligned with the principles of sustainability, social responsibility and good corporate governance.

The governance and management bodies of Caja Rural de Navarra Group, including the relevant Committees, receive regular reports on sustainability impacts, risks and opportunities that may be material to the Group. This information is managed by the Sustainability Committee and is reported to the Committee by the Heads of Area either quarterly or as specific circumstances demand.

In addition, the due diligence framework includes an examination of the performance and effectiveness of policies and actions taken to address these risks and opportunities.

As a result, Caja Rural de Navarra Group has structured and rigorous processes for the identification and assessment of impacts, risks and opportunities related to sustainability. These processes comply with current regulations and integrate best practices in risk management, ensuring that the Group can effectively identify the material impacts and risks that may affect its operations and, at the same time, uncover any opportunities that may arise in the field of sustainability.

As part of the framework, the Group developed a Double Materiality process, a key approach to address the impacts of the Group's activity on environmental, social and governance (ESG) factors and the risks and opportunities derived from these factors for the business and corporate strategy. The Double Materiality process enabled the Group to identify a comprehensive list of material impacts, risks and opportunities, distributed across key areas such as climate change, regulatory risks associated with sustainability, energy efficiency, corporate social responsibility and corporate governance.

The analysis of impacts, risks and opportunities took a comprehensive approach, considering effects at the Bank and at its subsidiaries and investees. In addition, special attention was paid to the risks related to national and international sustainability regulations, and to the opportunities that may arise as the market moves towards a greener and more responsible economy.

To assess the materiality of the impacts, risks and opportunities identified, thorough investigations were conducted to understand their potential impact on the Group's strategy and day-to-day operations. This process includes prioritising risks by their likelihood of occurrence and severity of impact, as well as the assessing opportunities that could benefit the Group, whether this be through new sustainable initiatives, innovative products or improvements in operational efficiency.

It is important to note that this entire evaluation and analysis exercise was reviewed and approved by the Group's different governing bodies, ensuring that the decisions taken are aligned with the principles of good governance and with the strategic objectives of Caja Rural de Navarra Group. The reports generated by this exercise are presented in detail, giving a clear view of how the risks and opportunities assessed can affect the Group's performance, as well as the way in which incidents are managed and decisions are taken at strategic and operational level.

This is why Caja Rural de Navarra Group has implemented a Double Materiality approach that allows it to accurately identify sustainability impacts, risks and opportunities, assess them with a rigorous methodology and ensure the entire process is aligned with corporate strategy. The exercise provides the basis for effective risk management and informed decision-making to make sure sustainability targets are met and corporate responsibility is strengthened in all areas of the Group. For greater detail on the Double Materiality process, see sections IRO-1 and IRO-2 in the Incident, Risk and Opportunity Management section.



Caja Rural de Navarra Group has identified the following impacts, risks and opportunities as material:

ESG	Description	IRO	Type	Topic	Value chain
Environmental	The promotion of operationally safe and stable infrastructures, particularly in sectors such as mobility and sustainable transport, by providing financial solutions that encourage investment in infrastructure that is resilient to climate change and developing innovative financial products to manage the risks associated with climate events.	Impact	Current Positive	E1 Climate change	Downstream
Environmental	Entry into force of the new regulations that require changes to the procedures for providing financial advice and communications to customers, to take account of the increasing importance of ESG criteria in making investment decisions.	Risk	Regulatory and legal	E1 Climate change	Downstream
Environmental	Entry into force of new regulations that impose levies or restrictions on economic activities with a negative impact on climate change adaptation.	Risk	Regulatory and legal	E1 Climate change	Downstream Core Business
Environmental	Application of disciplinary measures to companies that engage in greenwashing or green-hushing.	Risk	Regulatory and legal	E1 Climate change	Downstream
Environmental	Increasing environmental awareness is driving profound changes in the preferences of consumers and other market actors that are forcing companies to adapt their business models to this new reality.	Risk	Market	E1 Climate change	Downstream Core Business
Environmental	Lack of accurate and reliable data that hampers the development of robust statistical models capable of measuring the potential impacts of climate and environmental risk factors.	Risk	Technologists	E1 Climate change	Downstream Core Business
Environmental	Statistical integration of climate factors into credit and investment risk assessment processes to quantify and manage the financial impacts of climate change.	Opportunity	Funding Resilience	E1 Climate change	Downstream Core Business
Environmental	Optimization of operating costs by improving the resilience of the Bank's physical infrastructure to extreme weather events.	Opportunity	Resilience	E1 Climate change	Downstream Core Business
Environmental	Rising carbon footprint from the financing of customers in carbon-intensive industries.	Impact	Potential Negative	E1 Climate change	Downstream Core Business
Environmental	Driving the energy transition and building up key economic sectors through vehicles that finance and invest in decarbonization projects.	Impact	Potential Positive	E1 Climate change	Downstream Core Business
Environmental	Failure to meet GHG targets set by the Bank.	Risk	Regulatory and legal Reputational	E1 Climate change	Downstream Core Business
Environmental	Failure to adequately implement the energy transition and decarbonization could undermine perceptions of the Bank and its reputation.	Risk	Reputational	E1 Climate change	Downstream Core Business
Environmental	Initiatives to transition to use of renewable energy in the Bank as part of its carbon footprint reduction strategy.	Opportunity	Efficiency in the use of resources	E1 Climate change	Downstream Upstream
Environmental	Strengthening the Bank's reputation by decarbonising the loan book, achieving targets and supporting counterparties' decarbonization initiatives.	Opportunity	Reputational	E1 Climate change	Downstream Core Business

ESG	Description	IRO	Type	Topic	Value chain
Environmental	Promote energy efficiency measures to cut energy consumption and costs.	Impact	Current Positive	E1 Climate change	Downstream Upstream
Environmental	Compliance with regulations that penalise energy-inefficient economic activities or homes with poor energy efficiency ratings.	Risk	Regulatory and legal	E1 Climate change	Downstream Core Business
Environmental	Development of energy-saving programmes targeted at all employees.	Opportunity	Efficiency in the use of resources	E1 Climate change	Core Business
Environmental	Finance and investment in high environmental impact industries, which generate air pollution and degrade the environment affecting people's quality of life and health.	Impact	Potential Negative	E2 Pollution	Downstream Core Business
Environmental	Promotion of sector-wide policies to cut air pollution, avoiding the financing and investment in activities that have a high risk of environmental impacts.	Impact	Potential Positive	E2 Pollution	Downstream Core Business
Environmental	Increased credit/market loss risk due to a failure to integrate environmental risks when assessing finance and/or seeking investment opportunities.	Risk	Market	E2 Pollution	Downstream Core Business
Social	Loss of productivity from poor motivation and commitment among the workforce caused by poor working conditions in respect of working hours, pay, health and safety at work, diversity, inclusion, etc.	Risk	Acute	S1 Own staff	Core Business
Social	Decline in quality of service due to difficulties attracting and retaining talent and a failure to bring on new generations in the workforce.	Risk	Acute	S1 Own staff	Core Business
Social	Promote employee well-being through initiatives to encourage healthy lifestyles and physical activity, prevent stress-related mental health problems and work-related accidents and run ergonomic working programmes.	Impact	Current Positive	S1 Own staff	Core Business
Social	Apply hiring policies that target vulnerable groups so promoting a more diverse and inclusive community.	Impact	Current Positive	S1 Own staff	Core Business Downstream
Social	Make sure branches are accessible to people with disabilities, in compliance with applicable law.	Opportunity	Reputational Regulatory and legal	S1 Own staff	Core Business
Social	Strengthen the Bank's image and attractiveness to talent by promoting a working environment of non-discrimination on grounds of gender, origin, race, disability, religion or sexual orientation.	Opportunity	Reputational	S1 Own staff	Core Business Downstream
Social	Partnerships with educational institutions to create specialised training programmes.	Impact	Current Positive	S1 Own staff	Core Business Downstream
Social	Ensure human rights are respected in all financing activities by requiring that companies meet international standards.	Opportunity	Reputational Market	S2 Workers in the value chain	Downstream
Social	Damage to communities and/or the environment caused by the conduct and/or financing of projects and operations.	Impact	Potential Negative	S3 Affected groups	Downstream Core Business

ESG	Description	IRO	Type	Topic	Value chain
Social	Agreements with public sector bodies to prevent financial/insurance exclusion in certain areas where the Bank is active.	Impact	Current Positive	S3 Affected groups	Downstream Core Business
Social	Strengthen the Bank's image through financing/investment projects for the local communities where it operates, including social volunteering.	Opportunity	Reputational	S3 Affected groups	Downstream Core Business
Social	Promote initiatives for active dialogue and listening to improve and strengthen community relations.	Opportunity	Reputational	S3 Affected groups	Downstream
Social	Increase customer trust by adopting ethical and responsible marketing practices.	Opportunity	Market	S4 Consumers and end-users	Downstream
Social	Facilitate accessibility and customer service through a range of communication channels (digital, physical, telephone, etc.), and by providing high-quality and secure financial products and services.	Impact	Current Positive	S4 Consumers and end-users	Downstream Core Business
Social	Proves impossible to adapt to new social standards on issues such as equality and diversity.	Risk	Reputational Regulatory and legal	S4 Consumers and end-users	Downstream
Social	Failure to meet the needs of certain population segments for accessing new products and/or services due to changing consumer preferences, which affects the Bank's business models.	Risk	Market	S4 Consumers and end-users	Downstream
Social	Clients find it hard to access products and services due to branch closures or a lack of physical and/or digital access provision.	Impact	Potential Negative	S4 Consumers and end-users	Downstream Market
Social	Shrinking customer base and problems in capturing new customers due to dissatisfaction with inadequate digital services.	Risk	Reputational Market	S4 Consumers and end-users	Downstream
Social	Disappointing levels of quality and security in the products and services offered.	Risk	Potential Negative	S4 Consumers and end-users	Downstream
Social	Customer discontent with the way customer services deal with incidents.	Impact	Current Positive	G1 Business conduct	Upstream Downstream Core Business
Governance	Promotion of appropriate protections for whistleblowers through measures like dissemination of the Code of Conduct and internal and external whistleblowing channels.	Impact	Current Positive	G1 Business conduct	Upstream Downstream Core Business
Governance	No cases of corruption, bribery or money-laundering.	Impact	Regulatory and legal Reputational	G1 Business conduct	Downstream Core Business



ESG	Description	IRO	Type	Topic	Value chain
Governance	Weaknesses in internal governance (standards, procedures, controls) intended to prevent crime and/or fraud.	Risk	Market Regulatory and legal Reputational	G1 Business conduct	Upstream Downstream Core Business
Governance	Strengthen trust by markets and customers by having a robust financial crime prevention framework, including independent auditing and continuous training for all employees.	Opportunity	Current Positive	G1 Business conduct	Core Business
Governance	Ensure good corporate governance by implementing standards and best practice when making investments, making sure these activities are conducted in an ethical and responsible manner.	Impact	Current Positive	G1 Business conduct	Core Business
Governance	Promote best practice in corporate governance and responsible leadership through annual training programmes for members of the Governing Board.	Impact	Regulatory and legal Reputational	G1 Business conduct	Downstream Core Business
Governance	Weaknesses in the performance of senior management functions, including in areas like diversity in decision-making, equitable compensation and the quality of skills development programmes.	Risk	Current Positive	G1 Business conduct	Core Business
Governance	Promotion of a culture of ethical enterprise and regulatory compliance, founded on trust and transparency, that can catch possible breaches early, protect those who comply with regulations, and involve all employees in a collective endeavour.	Impact	Current Positive	G1 Business conduct	Downstream Core Business
Governance	Promotion of an organizational culture based on excellence, respect and proximity that can sustain and strengthen links with the community, while pursuing socially responsible economic growth.	Impact	Reputational	G1 Business conduct	Downstream Core Business
Governance	Reputational damage from an inadequate corporate culture where behaviours fail to align with the Bank's internal ESG policies.	Risk	Reputational	G1 Business conduct	Core Business
Governance	Improve the corporate image through good management of corporate ethics practices (e.g. Encouraging an ethical culture and compliance with the principles in the code of conduct and the Bank's other tools in this area).	Opportunity	Current Positive	Transversal Specific to Caja Rural de Navarra Group	Downstream
Specific	Promote relationships of trust with all taxation authorities based on transparent and ongoing communications to promote voluntary compliance with tax obligations.	Impact	Current Positive	Transversal Specific to Caja Rural de Navarra Group	Downstream
Specific	Help improve the economic development of the Bank's environment through taxes paid.	Impact	Regulatory and legal Reputational	Transversal Specific to Caja Rural de Navarra Group	Upstream Downstream Core Business
Specific	Exposure to legal disputes over tax as a result of poor tax management, endangering the trust of customers, suppliers and commercial partners.	Risk	Potential Positive	Transversal Specific to Caja Rural de Navarra Group	Upstream Downstream Core Business
Specific	Implement a continuous improvement process for cyberattack prevention and mitigation procedures, ensuring these are up-to-date with best market practice.	Impact	Current Positive	Transversal Specific to Caja Rural de Navarra Group	Upstream Downstream Core Business

ESG	Description	IRO	Type	Topic	Value chain
Specific	No breaches of data security or cyberattacks in the Bank (e.g. leaks of personal data)	Impact	Current Positive	Transversal Specific to Caja Rural de Navarra Group	Core Business
Specific	Cybersecurity training courses and awareness-raising of the issues across the Bank.	Impact	Regulatory and legal Reputational	Transversal Specific to Caja Rural de Navarra Group	Downstream Core Business
Specific	Reputational damage to the Bank and legal penalties for personal data leaks due to poor IT safeguarding of data.	Risk	Current Positive	Transversal Specific to Caja Rural de Navarra Group	Downstream
Specific	Reducing the Bank's environmental footprint through digitization, less use of paper and minimising customers' travel by making functionalities available through their digital personal manager.	Impact	Current Positive	Transversal Specific to Caja Rural de Navarra Group	Downstream
Specific	Extending digitization by creating remote channels where our customers can transact more flexibly and simply (online and telephone banking).	Impact	Technologists	Transversal Specific to Caja Rural de Navarra Group	Core Business
Specific	Inadequate budgeting for innovation, preventing the company identifying and seizing new business opportunities.	Risk	Tecnológicos	Transversal Específico de Grupo Caja Rural de Navarra	Core Business

### GOV-3: INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

Caja Rural de Navarra Group has a Remuneration Policy whose fundamental objective is to align the performance of employees with the Group's strategic and long-term objectives, promoting management efficiency and ensuring compliance with current regulations. This policy sets out the basic principles guiding the design and allocation of remuneration within the Group. These principles state, among other requirements, that remuneration must:

- Promote and be compatible with appropriate and effective risk management.
- Not encourage risk-taking beyond the level tolerated by the Group.
- Be compatible with business strategy, targets, value and long-term interests.
- Include measures to avoid conflicts of interest.
- Ensure control functions are independent of business units.
- Consider regulations on sustainability risks (ESG risks) so as not to encourage excessive risk-taking and be linked to risk-adjusted returns.

With regard to variable remuneration, the Group's policy stands out for its focus on sustainability. Caja Rural de Navarra Group is actively working to integrate sustainability criteria into the incentive system, ensuring that remuneration decisions are aligned with the organization's values and its social and environmental goals. Specifically, it now requires that 5% of variable remuneration is conditional on the quality of customer service, reflecting the Group's commitment to customer

satisfaction and well-being, and has introduced factors that promote a sustainable business model.

### GOV-4: STATEMENT ON DUE DILIGENCE

As part of its commitment to sustainability, human rights and good governance, Caja Rural de Navarra Group has incorporated due diligence principles and mechanisms into its decision-making and business management processes. Due diligence is applied both to its own projects and to initiatives developed in collaboration with third parties. Its aim is to prevent, mitigate and, where appropriate, remediate any negative impacts that may arise from its activity on people, the environment or the local social and economic fabric.

Caja Rural de Navarra Group takes a preventative approach to evaluating potential risks in social, environmental, ethical and governance matters, integrating ESG criteria upstream into its processes for evaluating and selecting projects, partnerships and investments. With this in mind, it applies a policy framework and internal procedures to reinforce its commitment to ethics, integrity and social responsibility. The framework rests on two fundamental pillars: (i) the Code of Conduct and other rules of conduct, and (ii) the Criminal Risk Prevention Model (CCMS - Criminal Compliance Management System). Thanks to these tools, the Group can ensure its activities are carried out in accordance with the principles of responsible conduct and promote fair, inclusive and transparent relationships with its staff and all its stakeholders.

### GOV-5: RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

Caja Rural de Navarra Group's organizational structure and its operational management and

control model are appropriate to ensure the efficient and prudent management of the Bank and its Group. The structure is characterised by a clear and appropriate demarcation of functions, with well-defined, transparent and coherent lines of responsibility that enable the proper functioning and supervision of all operations within the Group.

Caja Rural de Navarra Group's internal control system is designed to adapt to the specific characteristics of the business, the complexity of the Group's activities and the associated risks. It also takes into account the context in which both the Bank and its CRN Group operate, ensuring that appropriate control and supervision measures are implemented at all levels.

This internal control framework is underpinned by a set of key principles, including:

- A well-defined and appropriate organizational and operational structure with an efficient internal control and governance framework.
- The creation of appropriate procedures for exchanging information between the Governing Board and Managing Director on the different business lines and between the Governing Board and heads of internal control through the Board's Internal Committees.
- A risk management and control model based on three lines of defence, each with differentiated functions and responsibilities, to provide adequate protection against risks.
- Appropriate segregation of functions, including the necessary information walls to make sure the internal control system can work effectively and without conflicts of interest.
- A comprehensive risk management framework covering all business lines and internal units,

providing a global and detailed overview of risks in all the Group's operating areas.

- In addition, procedures are implemented to ensure the monitoring and control of the outsourcing of certain functions or services, based on the EBA/GL/2019/02 outsourcing guidelines.

The Governing Board of Caja Rural de Navarra is the body responsible for defining the general framework for internal control and risk management. It is supported in this role by the Audit Committee, which supervises the effectiveness of internal control, internal audit, regulatory compliance and the risk management systems. The same Committee is responsible for discussing with the auditor any significant weaknesses in the internal control system that may be detected during the audit, while safeguarding the auditor's independence. The Audit Committee may submit recommendations or proposals to the Governing Board and regularly checks on follow-up of these recommendations.

In addition, the Risk Committee advises the Board on the Bank's overall risk appetite, both current and future, as well as on the risk strategy, ensuring that risk management is focused on the Group's goals and aligned with changes in the environment.

#### 1. Internal Control

The Group's internal control framework is based on a decentralised structure, namely the three lines of defence model recommended by the Basel Committee on Banking Supervision. The chart below illustrates the interplay between the three lines of defence.



The functions and responsibilities of each line of defence are as follows:

#### → 1<sup>ST</sup> LINE OF DEFENCE – BUSINESS

Main responsibility is operational risk management within the business areas. This first level is responsible for identifying, assessing and mitigating risks directly related to the Group's day-to-day business activities, ensuring that procedures and operations in each area are carried out in a controlled manner and in accordance with internal regulations and guidelines. Furthermore, this line

of defence acts as additional back-up, helped by the segregation between risk management areas and business areas. This segregation ensures that, although the business areas are responsible for operational risk management, risk oversight and strategy are handled independently, which provides a more objective and effective source of risk management. Associated functions include:

- Responsibility for the identification, measurement or assessment, control,

mitigation and communication of the main risks affecting the Group in the course of its business.

- Responsibility for day-to-day risk management, especially risks arising from its day-to-day operations.
- Development of a first level of risk management control to guarantee that operational processes are done in accordance with established guidelines.

#### → 2<sup>ND</sup> LINE OF DEFENCE - RISK MANAGEMENT, COMPLIANCE, ETC

main responsibility is the control and supervision of the risks within its remit. This level acts as a support system for the first line, ensuring that the risks identified in the business areas are appropriately managed and controlled in accordance with established policies and procedures. In addition, the 2nd line of defence works proactively in the continuous assessment of risks, ensuring that mitigation strategies and controls are effective in maintaining the Group's stability and regulatory compliance. Associated functions include:

- Responsibility for setting up the Bank's Internal Control Framework and overseeing compliance with it.
- Risk measurement and monitoring to ensure appropriate control and internal/external reporting.
- Review compliance with policies and their integration into Group management practice.
- Validation of the procedures implemented by the risk management areas.

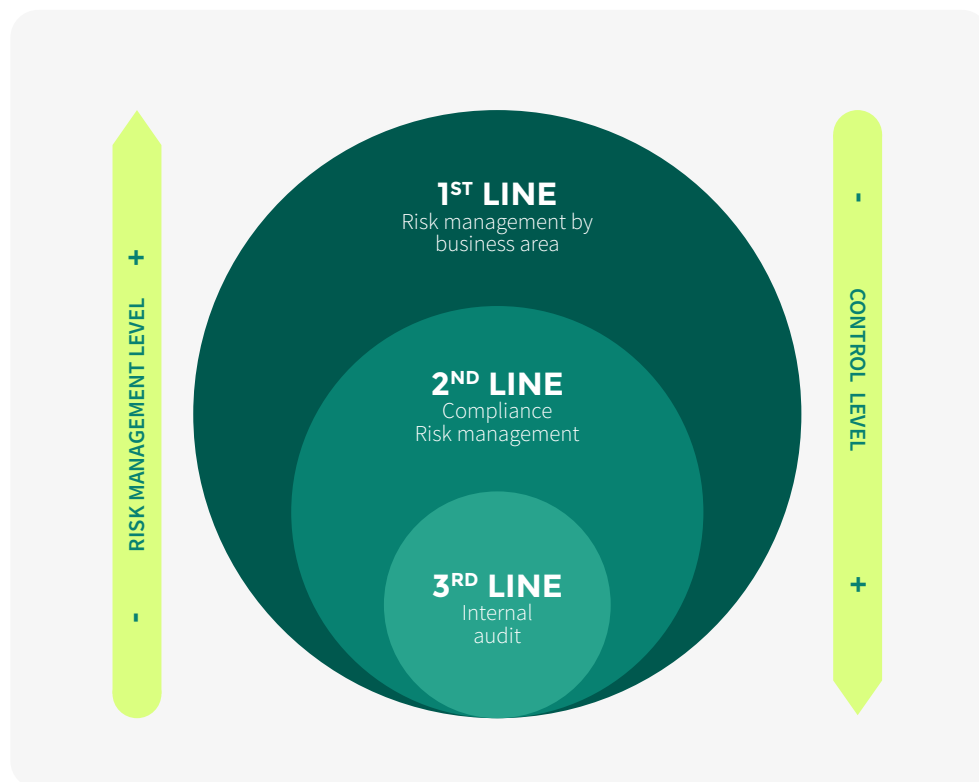
- Advice to the 1st Line of Defence to ensure effective risk management in their respective areas.

#### → 3<sup>RD</sup> LINE OF DEFENCE - INTERNAL AUDIT

Independently oversees implementation of the controls and Internal Control Systems established within the Group. This level acts as a verification mechanism to ensure that the controls implemented by the first two lines of defence are appropriate and effective. Internal Audit provides an objective and detailed review of the control systems, identifying potential weaknesses and ensuring that policies and procedures are properly applied throughout the organization. The role of the Internal Audit Function is therefore to:

- Assess whether the quality of the Internal Control Framework is effective and efficient.
- Check compliance with policies and procedures associated with all Group activities.
- Validate the procedures implemented by the risk management areas to ensure they are correctly implemented and effective.

Caja Rural de Navarra Group's internal control functions - which include risk management, regulatory compliance and internal audit - act separately and independently to guarantee objectivity and efficiency in the exercise of their respective competences. These functions report directly to the Internal Committees or to the Group's Governing Board, which guarantees their autonomy and independence in overseeing and controlling the Group's activities. The purpose of this approach is to check that the policies, mechanisms and procedures in the internal control



framework are correctly applied in their respective areas of competence.

In this context, the Governing Board, with the support of the Audit Committee and the Risk Committee, must ensure that those responsible for internal control functions can go about their duties independently and, whenever necessary, submit recommendations or proposals to improve the policies and procedures in place.

In addition, and without prejudice to the reporting obligations of each business area or other areas, the internal control functions are responsible for immediately informing the Governing Board, its Committees and the Managing Director of any non-compliance, incident or anomaly they identify, especially when it is material and could affect the Group's operations or risks.

### 1.1. Risk Management

The quality of its risk management is one of the hallmarks of Caja Rural de Navarra Group and a priority focus within the Group's global strategy. Thanks to its combination of prudent policies and proven methodologies and procedures, the Group is able to deliver solid recurrent results and sustain a robust solvency position. This approach means we can meet the challenges of the economic environment safely and with effective management of risks.

A key point here is the Bank's participation in an Institutional Protection Scheme, which is structured as a tool for mutual support and defence within the Spanish Association of Cajas Rurales (Asociación Española de Cajas Rurales). The scheme, which qualifies as an Institutional Protection Scheme under European law, provides support to member institutions, reinforcing the soundness of their solvency and ensuring they can deal with contingencies that may arise.

Risk Management in Caja Rural de Navarra Group is carried out by the Risk Management Unit, which reports directly to the Governing Board through the Bank's Risk Committee, which guarantees its autonomy and independence in the exercise of its powers. The unit's mission is to carry out all necessary actions and procedures for the proper management of risks in the Group, ensuring risks are identified, assessed and managed appropriately.

To maintain a moderate and prudent risk profile, the Group has established a set of key metrics that relate to the levels of the different risks, the quality and recurrence of earnings, liquidity and solvency. Specific risk tolerance levels are defined for each of these metrics for the Bank and CRN Group. In addition, long-term targets are set for the most important metrics, which are reviewed and approved annually by the Governing Board at the proposal of the Risk Committee.

For each metric, three key elements are defined: the target, which is the value that matches the Group's defined risk appetite; the tolerance, an alert threshold beyond which enhanced management and control measures are applied to get back on target; and the limit, the level that must not be exceeded, and which triggers strong measures to get back to levels within the guidelines set by the Governing Board.

Part of the function's role is to draw up regular reports for the Governing Board detailing the risks taken on, the level of capitalization of Caja Rural de Navarra Group, risk mitigation and control measures, and the state of internal control and its ability to guarantee orderly and prudent management of the Group's business. These reports pay special attention to the indicators and metrics approved in the Risk Appetite Framework and the Recovery Plan, ensuring that

risk management is aligned with the strategic and operational goals of the Bank and its Group.

### ESG RISKS INTEGRATED IN RISK MANAGEMENT

The Bank's approach to financing a sustainable economy forms an integral part of its lending processes. ESG criteria and risks are factored into the Bank's financing and risk management strategy through a process based on the following principles:

- > **Responsibility:** the Bank sees integrating ESG criteria and risks into the day-to-day activities of its governance model as a shared responsibility. All employees must be aware of the importance of this risk and be adequately trained to consider and understand the nature and consequences of ESG risks.
- > **Engagement by senior management:** the Bank's senior management leads from the top in the consideration and management of ESG risks. It promotes the integration of ESG risks when defining procedures and strategies for granting finance and ensures compliance with regulatory requirements. It also takes responsibility for creating and maintaining a culture that instils ESG criteria into the Bank's business model.
- > **Profitability and sustainability:** profitability is a key issue for business continuity in the short term, while sustainability represents ethical and long-term responsibility. The Bank has the vision and expertise to combine both perspectives in its business model.
- > **Integration of ESG risks into lending processes:** procedures and criteria for granting finance to customers integrate and consider ESG risks as an essential part. Sustainability risks and their impact on the projects and
- > **Appropriate revisions to methodology and metrics:** the Bank reviews, applies and, where appropriate, adapts its metrics and methodologies in line with regulatory requirements and best practices and criteria in the sector, in a timely manner to adequately manage ESG criteria and risks.
- > **Principle of proportionality:** the resources to calculate and assess ESG and financial risks are allocated on a case-by-case basis according to the characteristics of each financing transaction.
- > **Independence of control, risk management and business functions:** the ESG risk management and control functions carry out their activities independently of the business functions.
- > **Cross-cutting approach:** ESG risks and criteria are considered in all areas and activities involved in the procedures and controls for the granting of finance.
- > **Integrated approach to risk:** ESG risks are considered and managed in an integrated manner with credit, market, operational and other relevant risks.
- > **Transparency:** based on accurate and timely management information, ESG risks are communicated internally and externally through appropriate channels. The ESG risk communication policy covers all relevant stakeholders.
- > **Exemplarity:** commitment is needed to ensure all employees are personally committed to the ESG risks arising from the activities of the Bank.

## IDENTIFICATION OF CLIMATE AND ENVIRONMENTAL RISKS

In line with the ECB's recommendations in its guide to "Good practices for climate-related and environmental risk management", published in November 2022, and the supervisory expectations of the competent authorities, the Bank defines climate risk not as an isolated risk, but as a series of events that have an impact on its traditional risks. It therefore seeks to identify climate and environmental risks that may impact credit risk through different channels, differentiating in its analysis between the portfolio of equity investments and the mortgage portfolio.

As a result, the Bank has at its disposal analyses of those economic sectors which are in principle more exposed to climate and environmental risks:

- > Extractive industries
- > Automotive
- > Energy supply
- > Transport and warehousing

The scenario used in the analyses consists of nine climate-related and environmental risk events, distinguishing between physical risks and transition risks, taken from a selection of proposals by TCFD, EFRAG, BaFin, CFRF and ECB. After assessing both the probability of occurrence over the capital planning time horizon and the severity of the risk should it occur, each sector was given a risk classification: very high, high, medium or low. This part of the process, in addition to the Bank's own expertise, drew on rating agencies' studies of the impact of environmental factors on different sectors and on the Spanish National Statistics Institute's (Instituto Nacional de Estadística) data on emissions by branch of economic activity.

The Bank has also defined five physical risks to which its mortgage portfolio could be exposed,

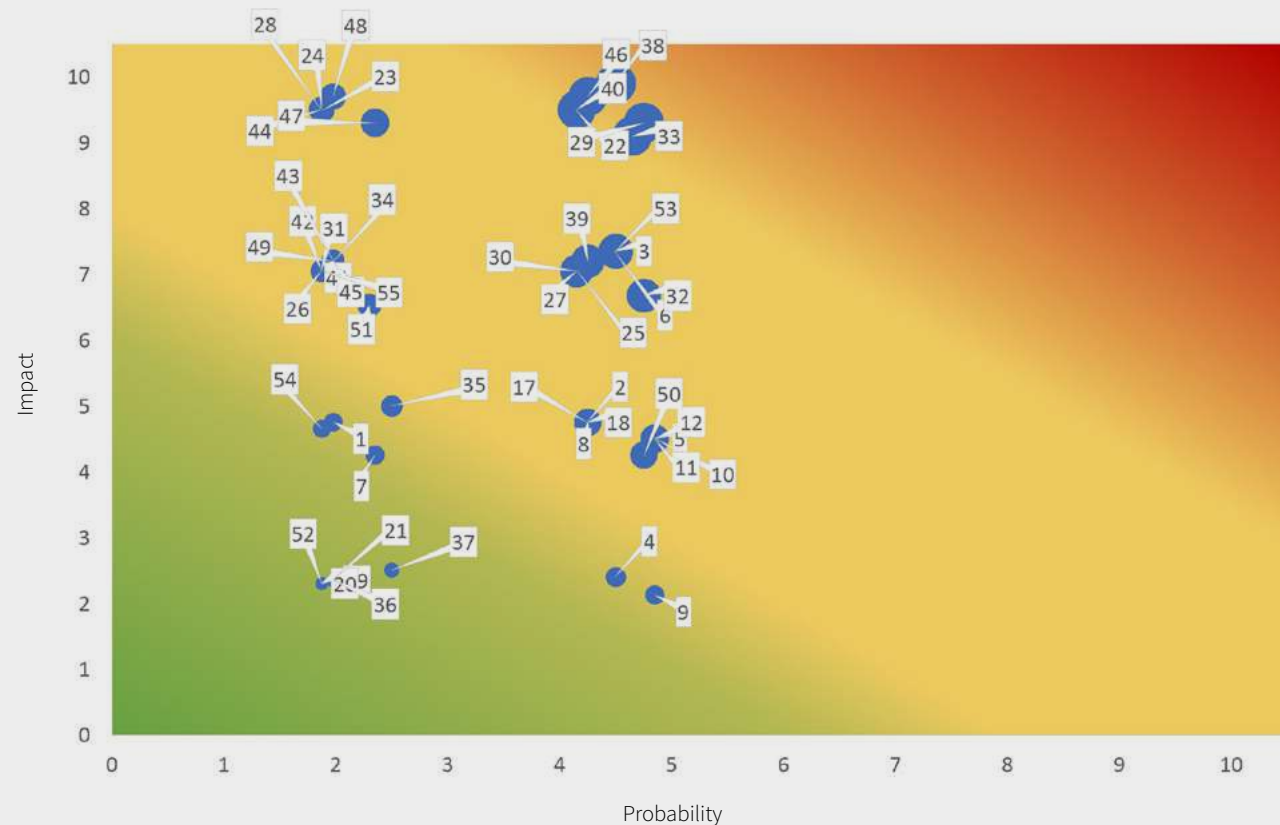
assessing both the probability of occurrence and severity of its impact on the final value of the collateral posted as security for mortgage loans:

- > River flood risk
- > Coastal flood risk
- > Desertification risk
- > Seismic risk
- > Fire risk

To do this, the study took geolocation data on the underlying properties and used it to analyse the physical risks to which they are exposed. This analysis can then be used as an input to quantify the impact of climate risks on the mortgage portfolio under different scenarios.

The Bank carries out regular materiality self-assessments through a questionnaire that

quantifies the potential impact, likelihood, control environment and time horizon of the key ESG risks. This self-assessment is approved by the management body and the results of the 2022 update are as follows:



E	Category	N1	Impact	N2	Impact
	Environment and climate change	1	Non-compliance with regulations or standards	1	Non-compliance with sector environmental and/or climate regulations/best practices
				2	Slow adaptation to new environmental and/or climate regulatory requirements
		2	Lack of a consolidated system for management of environmental and climate risks	3	Failure to include climate change and environmental risks when estimating financial and risk ratios
				4	Lack of or inadequate integration of an environmental operational efficiency strategy
				5	Lack of or inadequate control environment for climate change mitigation and adaptation
				6	Lack of consideration for environmental or climate change factors in the Bank's financing and investment policies
				7	Impairment of balance sheet assets as a result of physical or regulatory changes
		3	Changes in market conditions due to environmental or climate impacts	8	Unable to meet changing customer demand for sustainable product options as absent from the Bank's range
				9	Increase in stranded assets on the balance sheet as a result of the transition to a low-carbon economy
				10	Changes in market trends due to climate change impacts
		4	Financing and investments in companies with a poor environmental performance	11	Change in ratings of a customer by data providers with an impact on the portfolio
				12	Increase in NPL risk among borrowers with high exposure to environmental and/or climate impacts

S	Category	N1	Impact	N2	Impact
	Employees	5	Poor behaviour or misunderstandings in labour relations	13	Failure to promote diversity and equal opportunities
				14	Lack of attention to employee development and well-being resulting in a lack of productivity
				15	Breach of fundamental human and labour rights in the ILO conventions or similar
				16	Mass redundancies (employee redundancy plans, etc.)
				17	Problems attracting and retaining talent
				18	Disagreement between the Bank and employee representatives
		6	Weak HR policies and actions	19	Lack of or inadequate policies on work-life balance, equality and diversity
				20	Lack of or inadequate policies on health and safety at work, etc.
				21	Corporate policies fail to match employee demands
	Customers	7	Design and marketing of inappropriate and/or non-transparent products	22	Lack of clarity in product descriptions and clauses
				23	Complex products that do not suit the customer profile
				24	An aggressive sales culture resulting in inappropriate sales
				25	Failure to respect customer diversity and discrimination
				26	Lack of guarantees on products sold
		8	Inefficient and/or poor policies and processes for after sales and customer services	27	Weaknesses in teams/processes for handling and resolving customer complaints/claims and/or inaccessibility of customer service systems
				28	Inability to offer products and business lines that appeal to customers
		9	Inability to respond to customer needs	29	Offer poorly adapted to changes in the social and/or demographic profile of customers
				30	Lack of solutions for customers at risk of social exclusion (vulnerable customers with low income or other social/economic circumstances)
				31	Difficulty adapting to the needs of customers struggling to access banking services (financial inclusion)
				32	Rural depopulation in areas where the Group operates that leads to a loss of retail and business customers
				33	Ageing local population that results in a loss of customers due to an inability to adapt to their needs
	Society/Local communities	10	Deficiencies in relations with local communities	34	Lack of policies and procedures to identify and assess the needs of local communities where the Bank is active
				35	No or inadequate contribution to the social needs of the local community (education, health, etc.)
				36	Lack of dialogue with local communities in the areas where the Bank is active
				37	Loss of social legitimacy to operate in the different territories (social licence)



G	Category	N1	Impact	N2	Impact
	Government, ethics and transparency	11	Poor structure and management of governance bodies and senior management	38	Board structure fails to comply with best practice: independence, diversity, etc.
				39	Design errors in the Bank's ESG strategy (suppliers, investments, etc.)
				40	Poor data management and protection and cybersecurity
				41	Senior management has low level of responsibility for governance of ESG matters
		12	Scandals linked to senior management	42	Conduct of transactions for abusive purposes or tax evasion (tax havens)
				43	Inaction by senior management faced with scandals or controversies affecting the Bank
				44	Inadequate, unethical or non-exemplary policies or processes by senior management
				45	Lack of transparency in the Bank's governance model
				46	Improper actions or statements that go against the Bank's ethical values (behaviour lacking in integrity, leadership and exemplarity)
				47	Senior management related or linked to scandal or corruption, fraud or other illegal activities.
				48	Confirmed cases of corruption, fraud, bribery or tax evasion by senior management
				49	Senior management relations with politics
	Relations with third parties	13	Relations with third parties	50	Inappropriate, controversial or scandalous behaviour by suppliers
				51	Link to improper or controversial behaviour by customers associated with the company
				52	Irresponsible management of the supply chain (supplier payments, discrimination in supplier selection and relations, abusive clauses in contracts, etc.)
				53	Questions about the organisation's links, whether true or not, to political parties or leaders or social movements of a political nature. The organisation or its leaders taking active and visible positions on the political agenda.
				54	Poor communications and relations with supervisors
				55	Lack of appeal to investors due to poor performance on ESG indicators

## 1.2. Regulatory Compliance

Caja Rural de Navarra Group is fully committed to strict compliance with all national and international regulations governing its activity, as well as to the proper conduct and development of its business. To guarantee this compliance, Caja Rural has a permanent and effective Regulatory Compliance Function. The main objective of this function is to manage the prevention and, where appropriate, mitigation of financial, penal and reputational risks associated with regulatory non-compliance, which could arise if the Group falls short of the standards required of a credit institution.

Caja Rural de Navarra Group's Regulatory Compliance function is carried out by the Regulatory Compliance Unit, which reports directly to the Audit Committee of the Governing Board, thus guaranteeing its autonomy and independence in the exercise of its powers. The unit's principle task is to conduct the actions and procedures necessary to supervise compliance with the obligations deriving from regulations in force, acting independently of the services and activities it controls.

To fulfil this task, the Regulatory Compliance Unit has a Compliance Methodology and an Annual Action Plan, both of which are approved by the Group's Audit Committee. The unit also designs and maintains the systems necessary to continuously assess the Bank's degree of compliance with the different regulations. This assessment is reported quarterly to the Audit Committee and annually to the Governing Board.

In addition, the Compliance Function lends support to the Governing Board on measures to be taken to ensure compliance with applicable laws, rules, regulations and standards. The function coordinates with specialised units that directly

manage key activities to ensure compliance in specific areas, including:

- Combating Money Laundering and Terrorist Financing, managed through Internal Control.
- Protection of personal data, overseen by the Data Protection Officer (DPO).
- Customer protection in the marketing of banking and investment products, managed by the Product Committee.
- Criminal liability, managed by the Corporate Compliance Officer.

All of this is coordinated and monitored by the Regulatory Compliance Unit, ensuring that all Group procedures and activities are aligned with the required legal and ethical standards.

The subsidiaries are subject to their own sector-specific regulations, with food safety and the care of seniors in nursing homes being of significant importance to the Group.

## 1.3. Audit

Caja Rural de Navarra Group independent and effective Internal Audit function, with the scope and resources to properly carry out its remit. This function is fulfilled by the Internal Audit Department which reports directly to the Governing Board via the Audit Committee. To ensure proper oversight, a Work Plan is developed annually in coordination with the Audit Committee, which sets out the internal audit focus and priorities for the year.

The main objectives of this function are to check that an appropriate and effective system of internal controls exists and is maintained, ensuring that the Group has procedures in place to assess the various risks associated with its activities. It also

monitors the effectiveness of the procedures for compliance with laws, regulations and internal oversight policies, ensuring that Caja Rural de Navarra Group operates within the established regulatory framework and complies with the applicable regulatory standards.

The Internal Audit Department reports regularly to the Audit Committee on the adequacy of the Bank's and the CRN Group's risk control policies, methods and procedures. This report includes an assessment of the effectiveness of the policies in place, ensuring that the controls are appropriate, are implemented effectively and are reviewed regularly so that they remain up-to-date and effective. This guarantees continuous monitoring of regulatory risks and compliance in the Group, helping ensure its security and operational stability.

## 1.4. Control over outsourcing of services

Outsourcing is defined as any type of agreement between Group entity and a service provider under which the provider performs a process, service or activity that would, if not outsourced, be done by the institution itself. In the current environment, many institutions consider outsourcing services or functions as a strategic tool: to access specialist expertise not available in-house, to better scale up production models and/or to streamline unit production costs without sacrificing quality of service.

However, outsourcing involves a number of underlying risks including operational, legal and compliance as well as reputational risks, concentration risks and country risk. Suppliers may fail to provide the outsourced services or the service may be interrupted. Their security systems may be inadequate, employees could prove unreliable, or they might fail to comply with applicable regulations. All these events can have

serious consequences for the Group resulting in financial losses, regulatory sanctions or damage to its reputation.

Aware of these risks, the Group has written control and audit systems into its contracts with the third parties in charge of outsourced functions, to comply with applicable regulations on outsourcing of functions. Specifically, these systems are in line with the EBA/GL/2019/02 Guidelines on Outsourcing, which regulate the key aspects of this process to ensure that an adequate level of control and compliance is maintained.

To ensure outsourcing is properly managed, the Group has an approved Outsourcing Policy which prescribes appropriate mechanisms for the internal governance of outsourcing and for the identification and management of the associated risks. The Procurement and Outsourcing Committee is responsible for this policy, overseeing its implementation and maintaining continuous monitoring.

There is also an internal "Outsourcing operating procedure", which incorporates all the rules and regulations applicable in this area. This procedure gives practical implementation to the guidelines in the Outsourcing Policy, focusing on those that are most essential or important. It defines systems to ensure compliance with the internal governance process for outsourcing, and to identify and manage the associated risks. It also ensures outsourced services are logged in advance, and can be monitored and controlled to minimise possible negative impacts for the Bank.

Investee companies, for their part, assess whether to outsource a service in consultation with their governing bodies and, where appropriate, with those outsourcing a similar service in the Bank. They may then call for several proposals to identify the one that best suits their needs. When

outsourcing is done within the group, the viability and suitability of the service is verified in a similar way to outsourcing to third parties.

When contracting suppliers, or companies that provide an outsourced service, the suitability analysis includes not only the necessary criteria of solvency, quality and price, but also other points that may imply a reputational risk. It is not frequent, and not always possible, to obtain detailed and accurate information on suppliers' compliance with social, gender equality and environmental policies. However, practically all procurement and outsourcing is done with companies known to the savings bank, either because they are local or because the Bank has a regular relationship with them or – as is essential in the critical aspects of the business – because they are investee companies of the Cajas Rurales. There is a Supplier Contracting manual in which, for the most recurrent activities, the supplier is asked to provide information on its social, gender equality and environmental policies.

Caja Rural de Navarra has a Suppliers handbook (detailing the procedure for the selection of suppliers, control and justification of expenditure), an operational procedure for outsourcing expenditure, a policy for outsourcing functions and a letter of presentation to suppliers, who are required to give detailed information on social, gender equality and environmental issues.

Subsidiary companies do not have a specific manual, and much procurement and outsourcing is also done with well-known companies, either because they are local or because they have a regular relationship with them. No audits are carried out on the supplier companies, although in the cereal sector, the products purchased are

subject to external analysis of quality and food safety factors.

## 2. Internal Control System for Sustainability Information

Caja Rural de Navarra Group is currently developing its Internal Control System for Sustainability Information, which will be based on generally accepted principles and best practice. The aim of the system is to make sure that the sustainability information generated and reported by the Group is reliable, relevant and aligned with applicable international regulations and standards on non-financial reporting and sustainability.

The Sustainability Reporting Internal Control System will be structured around five key components:

- **Control Environment:** fostering a strong organizational culture around sustainability, based on ethical principles and compliance with standards in force.
- **Risk Assessment:** identification and assessment of sustainability-related risks that may impact the Group's activities, including environmental, social and governance issues.
- **Control Activities:** implementation of appropriate policies and procedures to ensure that sustainability information is managed accurately and in accordance with regulations.
- **Information and Communication:** establish effective mechanisms to ensure that sustainability information flows appropriately between operational levels and the Group's governance bodies.

- **Monitoring:** continuous supervision to ensure that the control system is kept up to date and functioning properly, allowing adaptation to new risks or regulatory changes.

The introduction of this Internal Control System for Sustainability Information will reassure all stakeholders that information on sustainability is managed appropriately, accurately and in accordance with best practice, which will in turn strengthen the transparency and credibility of Caja Rural de Navarra Group as it moves towards responsible and sustainable management.

## STRATEGY

### SBM-1: Strategy, business model and value chain

sustainable business model, focused on offering responsible financial management and long-term value for all its stakeholders, within a framework of innovation and social responsibility. Its strategy applies the principles of sustainability and responsible risk management to each of its operations, promoting economic and social development throughout its environment, especially in the regions where it operates.

As befits a regional, cooperative, retail bank, CRN has developed a strategy based on listening and responding to the expectations of its stakeholders. Under the Bank's governance framework, this strategy is set by the Governing Board itself and is reflected in the Strategic Plans it approves, which have guided the Bank's actions over the years. At the same time, recognising that most of the challenges and opportunities linked to sustainability cut across different issues and areas,

the Governing Board has delegated management of all material ESG matters – whether financially or in terms of impact – to the Sustainability Committee.

In addition, as financial materiality has become a bigger issue for the financial industry (i.e. sustainability issues have had a greater impact on the financial sector itself) CRN has progressively adapted its strategy, systems and policies to measure, disclose and manage sustainability risks, following the relevant general and sector regulations.

Caja Rural de Navarra Group has also committed to the Sustainability Master Plan developed by the Caja Rural Group<sup>1</sup>, of which it is a member. The Master Plan prescribes a number of strategies and action plans, some applicable to all members of the Caja Rural Group and others requiring adaptation to the needs of individual entities.

CRN's Governing Board has adopted the Sustainability Master Plan as CRN's own in-house sustainability strategy. It is kept informed about progress with the Master Plan and key developments and projects undertaken by the Bank to meet the challenges and seize the opportunities of sustainability in its environmental, social and governance dimensions.

The regulatory environment has been evolving in recent years, and the entry into force of the CSRD directive<sup>2</sup> has led to changes in the procedures for analysing, managing and reporting on sustainability, to an approach focused on impacts, risks and opportunities. The Bank has been adapting its procedures to these regulatory changes and will continue to do so in the future.

<sup>1</sup> <https://www.grupocajarural.es/es>

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32022L2464>

## 1. Business Strategy

Caja Rural de Navarra Group's business strategy is built on a sound strategic foundation of three essential pillars –Financial Sustainability, Customer Proximity and Digital Transformation and Fintech– that guide its development and its approach to sustainable and responsible growth. The three pillars not only allow Caja Rural to meet the challenges of the financial market but also promote a close and lasting relationship with its customers and the wider community. We describe

### A. FINANCIAL SUSTAINABILITY

Financial sustainability is one of the core elements of the Group's business strategy. In an ever-changing economic environment, the Group focuses on maintaining sound financial management to ensure its long-term stability. This is achieved through a prudent and rigorous approach to key aspects of the Bank's finances:

- A robust capital base means the Bank can weather any economic uncertainties and potential market disruptions. Capital stability is not only vital to its day-to-day operations, but is also fundamental to meeting regulatory requirements and commanding the confidence of customers and investors.
- Adequate liquidity is another core element of financial sustainability. Caja Rural de Navarra Group's liquidity management policies mean it can respond quickly to any need for funds, so it can continue to operate efficiently and without risk of insolvency. This is particularly important in times of economic volatility, when market fluctuations can affect the stability of financial institutions.

- Sustainable profitability is another core commitment of the Group. This means generating profits that are consistent over time, without jeopardising the Group's stability or its ability to meet the challenges of the future. To this end, financial risks are subject to regular and exhaustive analysis.

### B. CUSTOMER PROXIMITY

A local and personalised approach to customers is another essential pillar of Caja Rural de Navarra Group's business strategy. It is firmly committed to personalised service, understanding that each customer has unique needs and circumstances which must be dealt with on an individual basis. To achieve this, a series of principles and practices have been established to guarantee a local service adapted to its different stakeholders, whether private individuals, companies or co-operatives:

- Offering financial products tailored to the specific needs of each client.
- Supporting local economies and key productive sectors in the areas where the Bank operates, such as the agricultural sector and SMEs. This support manifests itself not only through specialised financial products, but also through corporate social responsibility initiatives that support the social and economic sustainability of local communities.
- Maintaining a constant relationship with its customers through its physical branches and digital platforms, providing personalised advice in a range of areas.

## C. DIGITAL TRANSFORMATION

Digital transformation and fintech is a fundamental strategic pillar that allows Caja Rural de Navarra Group to improve operational efficiency, access new markets and, most importantly, optimise the customer experience. The Group recognises that digital innovation is crucial to remain competitive in an increasingly digitalised environment and to meet the expectations of its customers, who demand fast and accessible solutions. For further details, see section "T3. Innovation and digitization of processes and more responsible services".

## 2. Business Model

Caja Rural de Navarra Group's business model is structured around three main blocks that allow it to manage its operations in a comprehensive manner and adapt to the diverse needs of its stakeholders: retail banking, wholesale banking and equity investments. Each of these blocks contributes to

strengthening its position in the market, to long-term financial sustainability, and to creating value for its customers, employees, investors and wider society.

### A. RETAIL BANKING

Retail banking is the cornerstone of Caja Rural de Navarra Group's business model, as it represents the direct relationship with individual customers and small businesses. Through this block, Caja Rural offers a wide range of financial products and services, tailored to the savings, financing and investment needs of consumers:

- **Current and savings accounts:** the Bank offers basic banking products, such as current accounts, savings accounts, and term deposits, designed to meet the needs of retail customers for liquidity and returns.



- **Personal loans:** the Bank provides various financing options, including personal loans, consumer credit and mortgages, with conditions tailored to the profiles of its customers.
- **Investment products:** through investment funds, pension plans and other financial products, the Bank offers investment solutions for customers seeking returns and/or interested in sustainable investments.
- **Digital services:** the Bank has made great progress in the digitization of its services, providing easy access to banking products and services through online and mobile banking, so customers can make banking transactions quickly and securely.
- **Personalised customer service:** one of the key elements of the Cuisse's retail banking is the close and personalised approach to customers. The savings bank maintains a strong relationship with its customers, offering financial advice tailored to their individual needs.

Caja Rural de Navarra has an organizational structure based on a network of branches and a dedicated sales team, centred on the regions where it is present. The business line is further supported by intermediate structures and centralised support functions, which provides specialised and consistent management for each area while at the same time ensuring efficient control and oversight.

## B. WHOLESALE BANKING

institutions and corporate clients. This segment is crucial for the Bank, allowing it to diversify its source of income, strengthen its presence in the corporate

market, and manage a wider range of complex products and services:

- **Corporate finance:** the Bank provides wholesale financing solutions, including credit lines, syndicated loans, and long-term project finance for companies in a range of sectors.
- **Treasury management:** the Bank offers advanced treasury management services to companies, helping them to optimise cash flow, manage liquidity, and hedge exchange rate and interest rate risks.
- **Institutional investment:** the Bank offers a range of specialised investment products for pension funds, insurance companies and public bodies.
- **Financing to international companies:** through financing agreements and foreign trade services, the Bank supports companies to expand and manage their international operations, including developing projects in global markets.
- **Financial advisory:** the Bank offers strategic and financial advisory services to companies, helping them to effectively manage their growth strategies, mergers and acquisitions, and financial structuring.

The wholesale banking business is essential to ensure that the Bank maintains a significant footprint in the corporate and business world, supporting its active participation in the economic development of the region.

## C. EQUITY INVESTMENTS

Caja Rural de Navarra Group holds a number of equity investments in companies and initiatives that complement its core operations, further diversifying its sources of income and strengthening its presence

in a number of strategic sectors. These holdings can include both companies in the financial sector and those linked to key economic sectors such as renewable energy, agriculture, infrastructure, etc. The main investees are restricted to the following sectors:

- **Cereals:** the investees focus on the production, processing, marketing and distribution of cereals and their derivatives. The companies are dedicated to growing or buying in raw materials such as wheat, maize and barley, among others, and transforming them into products such as flour, flakes, breakfast cereals or ingredients for the food industry.
- **Winery services:** the business model of equity investments in the winery services sector focuses on providing specialised solutions to producers of wine and other alcoholic beverages. These may include fermentation management, bottling, labelling, distribution, viticulture and oenology consultancy, equipment maintenance, and optimization of logistical processes.
- **Senior care services:** the business model of these equity investments focuses on providing personalised solutions and care for the elderly. Services may include home care, medical assistance, physiotherapy services, support with daily activities (such as feeding, hygiene and mobility), as well as recreation and wellness programmes.
- **Caja Rural customer support:** the business model offers additional products and services to support the banking and financial transactions of the Bank and its customers. These may include technological solutions such as financial management platforms, payment and collection systems, investment advisory services, insurance, and consultancy in areas such as risk management and regulatory compliance.

## 3. Value Chain

Caja Rural de Navarra Group's value chain is structured around three key areas: Upstream, Core Business and Downstream. This structure means the Group can focus on efficient and responsible management through all stages of its operations.

### A. UPSTREAM

The upstream value chain covers supplier relationships and management of key resources, such as technology, energy and consulting suppliers. The main categories of business in this area include:

- **Technology suppliers:** companies that provide digital solutions and cybersecurity systems, which are essential for the Group's digital operations.
- **Energy suppliers:** companies that supply energy resources, contributing to operational efficiency and sustainable resource management.
- **Raw materials suppliers:** used by investee companies.
- **Financial service providers and consultancy:** strategic advice to support the Group in its operational decisions and risk management.

### B. CORE BUSINESS

The core business of Caja Rural de Navarra Group is providing financial services to its customers, including:

- **Personal and corporate loans:** financial products tailored to the needs of individuals



and companies, including the financing of green and sustainable projects.

- **Banking services:** current accounts, credit cards, deposits, investment products and other basic financial services.
- **Risk management:** implementation of appropriate risk management policies to mitigate financial, operational and regulatory risks, with particular emphasis on climate risk and responsible finance.

However, as mentioned above, the core business also includes the business activities of investees in key sectors such as cereals, winery services and senior care. These equity investments complement the Group's core business, contributing to the diversification of the business model and strengthening the Group's presence in strategic markets.

### C. DOWNSTREAM

This section of the value chain is focused on the Bank's customers and the marketing of its products and services. Key groups include:

- **Corporate customers:** Caja Rural de Navarra offers financial products specifically designed for SMEs, agricultural companies and other key sectors in the local economy.
- **Retail customers:** services to individual include savings products, personal loans and green finance.
- **Customers of equity investments:** also included in this section are the customers of the Bank's investee companies in cereals, winery services and senior care.

The current strategy of Caja Rural de Navarra Group addresses the material impacts, risks and opportunities (IROS) identified in the Double Materiality process, ensuring the Bank's business model fully deals with the key issues affecting its long-term sustainability and performance.

The next Strategic Plan 2026-2028, currently being drafted, will incorporate the results of the Double materiality assessment, including the results of consultations with stakeholder groups. This approach will make sure the future strategy is fully aligned with the sustainability issues identified as material. It is important to highlight that environmental matters have turned out to be a material issue for the organization, and will therefore be incorporated as a strategic axis within the new plan.

### SBM-2: Interests and views of stakeholders

As part of its strategic management, Caja Rural de Navarra Group recognises the importance of identifying, understanding and managing the interests and views of its stakeholders. These groups play a crucial role in the development and execution of the Group's activities, especially in areas that have a direct impact on its sustainability strategy and business model. Ongoing interaction with stakeholders contributes significantly to the design of strategies that not only seek to meet the Group's objectives, but also to foster constructive and mutually beneficial relationships.

Caja Rural de Navarra Group is committed to maintaining close and active collaboration with various stakeholder groups, including customers, employees, investors, suppliers, regulatory authorities and external organizations. The Group has established systems for open communication

and continuous dialogue to ensure the needs and expectations of these groups are understood and properly managed, ensuring buy-in to the Group's strategic objectives and long-term vision.

Major stakeholders of Caja Rural de Navarra Group include customers, who are fundamental to the Group as their demand for financial products, advice and banking services is the basis of its business. Employees are essential to the day-to-day operations and the development of the corporate culture, and key to implementation of the sustainability strategy. Investors and shareholders focus on the Group's profitability, long-term sustainability and financial stability. Suppliers provide crucial goods and services to meet the Group's operational and strategic goals. Lastly, regulatory authorities play an important role in setting the regulatory framework and overseeing compliance with regulations applicable to the Bank.

As part of its approach to sustainability, Caja Rural de Navarra Group values collaboration with other actors in the ecosystem. Interactions include partnerships with financial sector organizations, non-governmental organizations (NGOs) and government bodies in projects that promote environmental, social and economic sustainability. The Group seeks to strengthen its inter-institutional relationships and expand opportunities to contribute to the common good, focusing especially on areas like sustainable finance, climate change adaptation and corporate social responsibility.

The process of managing these interests and views is based on relationships of transparency, trust and mutual accountability. These principles are fundamental to ensuring that the Group's strategic and operational decisions are aligned with the interests of the various stakeholders, thus contributing to informed decision-making that

promotes sustainability in its social, economic and environmental aspects.

Caja Rural de Navarra Group also operates within a national and international regulatory framework that sets clear standards and compliance obligations regarding stakeholder rights. The Group is committed to complying with all laws and regulations applicable to the banking and financial sectors, as well as with international sustainability principles. For this reason, an accountability system has been implemented to ensure oversight by regulators and stakeholders and promote transparent business practices.

As well as forging good stakeholder relations, the Group takes account of their views and expectations when changing its strategies and operations, with an eye to mutual benefit. This is reflected in the continuous improvement of the services and products offered, the implementation of policies that favour sustainable development, and the making of strategic decisions that serve not only the interests of the Bank, but also those of its stakeholders.

Whenever it identifies new stakeholder needs or concerns, Caja Rural de Navarra Group is committed to adapting its strategy and operations accordingly. This could mean modifying its business strategies, adapting products, or even revising its sustainability policies, always with the aim of better meeting stakeholder expectations. Flexibility to adjust to stakeholder needs is essential to maintain long-term relationships and ensure the Bank remains a responsible and trustworthy organization.

Changes needed to take account of stakeholder interests will be planned in advance and appropriate timeframes set for implementation. The changes will then be made gradually and systematically to minimize any negative impact

and make sure the interests of all stakeholders are duly considered.

The option to change in response to stakeholders' input is written into Caja Rural de Navarra Group's proactive management process. The Group is open to adjustments to its strategy based on stakeholder recommendations, especially when it comes to improving its sustainability and social responsibility. Strategic decisions are always taken with the supervision of the competent bodies, ensuring that all perspectives are taken into account for a balanced management aligned with the Group's principles.

This inclusive and responsible management approach not only allows Caja Rural de Navarra Group to remain aligned with its stakeholders' expectations, but also reinforces its commitment to sustainability and its role as a socially responsible actor, prepared to respond appropriately to the challenges presented by the environment.

### **SBM-3: Material IROs and their interaction with strategy and business model**

Caja Rural de Navarra Group has developed a comprehensive approach to the identification and management of material impacts, risks and opportunities (IROs) through the double materiality process, a process that allows it to identify the material impacts of its operations and the risks and opportunities that could affect the sustainability and profitability of the business. The exercise identified the key factors influencing the Group's internal operations and its interactions with stakeholders and the regulatory and social environment.

The double materiality assessment identified material impacts, risks and opportunities that have

the potential to affect the Group's strategies and operations, both from a financial and non-financial perspective. Firstly, material impacts are the effects that the Group's activities may have on the environment, human rights, society at large and stakeholders. These could be either negative or positive, such as those arising from the transition to a low-carbon economy, responsible investment practices, and support for the local economy.

Turning to risks, risks have been identified that may have an adverse effect on the Group's operations and require priority attention. These risks, being aligned with market developments and ever-changing regulatory standards, require constant monitoring to protect the Group's assets and investments.

The double materiality process also identified a number of business opportunities linked to sustainability and innovation. Among these opportunities are the offer of sustainable financial products adapted to the needs of customers concerned about climate change, the digitization of services to improve efficiency and accessibility, and support for green and renewable energy projects. These opportunities, by aligning with global sustainability trends, not only contribute to mitigating the risks identified, but also offer new avenues for growth, diversification and customer loyalty.

Having identified the material IROs, Caja Rural de Navarra Group strategically integrated them into its business model and corporate decision-making. Through its financial strategy, the Group has adjusted its risk management policies to incorporate sustainability factors in all business lines, including retail banking, wholesale banking and equity investments. This involves, for example, sustainable lending and the financing of green projects and adopting policies to mitigate climate and regulatory risks. Furthermore, in its retail

banking arm, Caja Rural de Navarra has promoted solutions to suit changing consumer behaviours, with financial products aimed at people looking to invest in a sustainable future, such as green savings accounts and responsible investment funds.

Also, the integration of IROs into the sustainability strategy has strengthened the Group's commitment to its social and environmental responsibility, guiding the expansion of products and services that, in addition to generating financial benefits, contribute to sustainable development. In this regard, the Group has adopted a proactive approach that not only allows it to adapt to regulatory requirements, but also positions Caja Rural de Navarra Group as a leader in sustainable financing and in the implementation of strategies aligned with the Sustainable Development Goals (SDGs).

The monitoring and periodic review of these IROs, together with the integration of stakeholder expectations, ensures that strategic decisions are informed and based on a thorough analysis of the associated risks and opportunities. The Group has established monitoring and accountability systems to ensure that sustainability policies are effective and aligned with the interests of its shareholders, customers, employees and other stakeholders.

It should be noted that the responsibility for the approval and monitoring of material impacts, risks and opportunities (IROs) rests with the Governing Board with the support of the Sustainability Committee.



## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

Caja Rural de Navarra Group had already done a materiality assessment for the purposes of non-financial information in prior years. However, this year the assessment has been updated and extended to match the requirements of the new CSRD regulations.

This update has been carried out by applying the double materiality approach and considering the Group as a whole, rather than individually for each of the investees. This means that certain matters that might be considered material for a specific entity – such as, for example, the use of water in an industrial investee – were not seen as material when analysing the Group's entire scope.

### IRO-1: Description of the process to identify and assess material IROs

The European Sustainability Reporting Standards (hereafter ESRS) offer flexibility in the materiality assessment process, allowing companies to

tailor the approach to their specific needs and circumstances. Whatever process is used, it must reflect the facts and circumstances of the company (full traceability of data). Accordingly, the Double Materiality process developed by Caja Rural de Navarra Group has been structured in 5 phases, as can be seen in the chart:

#### Fases del análisis de doble Materialidad



#### CONTEXT ANALYSIS

#### PRELIMINARY TOPIC LIST

#### CONSULTATION WITH STAKEHOLDERS

#### IDENTIFICATION AND APPROVAL OF IROS

#### REVIEW OF IROS AND MATERIALITY MATRIX

#### Phase 1

Context analysis of the external market (trends, regulation, sustainable rating analysts and peers), the Group's internal environment (Business Model, Master Plan, commitment to sustainability, etc.) and stakeholders.

#### Phase 2

Drawing up a list of potentially material topics for the Group, based on the list of relevant topics/sub-topics identified in the ESRS, plus topics/sub-topics specific to Caja Rural de Navarra Group that are not included in the ESRS.

#### Phase 3

Incorporation of stakeholder views to confirm the topics previously identified as potentially material and to identify the impacts, risks and opportunities (IROs) related to these topics..

#### Phase 4

Preparation of the list of IROs based on the results of the previous phases and confirmed by the responsible areas of the Group.

#### Phase 5

Assessment and Outcome of the Double Materiality process

## 1. CONTEXT ANALYSIS

The aim of the context analysis is twofold. Firstly, it seeks to identify the topics, sub-topics and sub-sub-topics of the ESRS that are relevant to both the external and internal environment of Caja Rural de Navarra Group and, where appropriate, to identify other relevant sustainability issues that are specific to the Group or the sector (entity-specific), beyond the topics covered by the ESRS.

Secondly, this first phase seeks to define the Group's high-level value chain, with the aim of identifying the relevant stakeholders for the Bank. This analysis gives us a clear understanding of the key relationships and dynamics that influence sustainability management in the organization.

This initial phase sets out the terrain for updating potentially material topics for Caja Rural de Navarra Group and lays the foundations for defining its value chain, which will facilitate strategic decision-making and alignment with sustainability goals.

The context analysis consists of four main steps: first, a context analysis is conducted from an external or market perspective, assessing outside factors and trends that may influence the Group. Secondly, an analysis is carried out from an internal perspective, examining the internal aspects of the organization, its capabilities, resources and operations. Thirdly, the value chain of Caja Rural de Navarra Group is defined. Finally, the fourth step consists of the identification and selection of stakeholders, which makes it possible to determine the key actors whose influence or impact is relevant for the strategic and sustainability decisions of Caja Rural de Navarra:

### EXTERNAL ANALYSIS

This analysis seeks to understand the Group's external environment and identify the sustainability topics that are relevant. To this end, the main macro- and micro-level trends in the sector are examined, as well as best practice in the market. It is also essential to look at current regulatory trends, assessing the direction in which regulators are driving the markets, which will allow the Group's sustainability strategies to adapt to expected regulatory changes. The following points were therefore analysed:

- > Dominant trends in the Group's sector. Note that this analysis looked at the specific operations of the Group and each of its equity investments, so that the particular context of each was considered when assessing relevant trends.
- > The sustainability regulations applicable to both the Group's sector and those of its investees. Also considered were regulations in the process of being approved, such as draft legislation, which could have an impact on operations and on compliance with sustainability standards.
- > ESG (environmental, social and governance) topics, and the corresponding IROs (impacts, risks and opportunities) associated with these topics, with a specific focus on what ESG analysts consider relevant, particularly for firms such as MSCI and S&P.
- > The Group's main peers, to identify the sustainability topics most relevant to them. This analysis enables an understanding of the trends and approaches adopted by other entities in the same sector, providing a broader, comparative view of sustainability challenges and opportunities.

### INTERNAL ANALYSIS

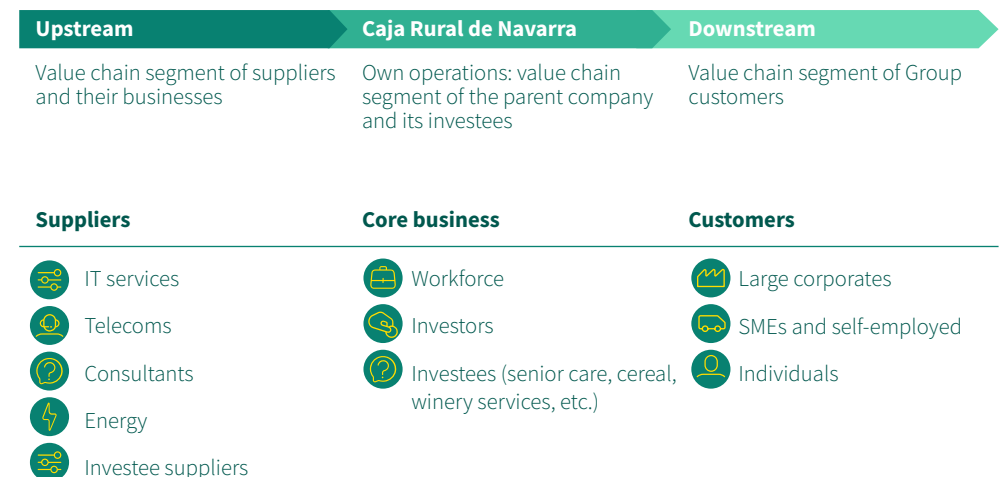
The second step in the context analysis seeks to understand the Group's internal positioning in relation to ESG (environmental, social and governance) topics and sub-topics, i.e. to identify which sustainability topics and sub-topics Caja Rural de Navarra Group considers relevant. To this end, an exhaustive analysis of all available internal documentation was carried out, including:

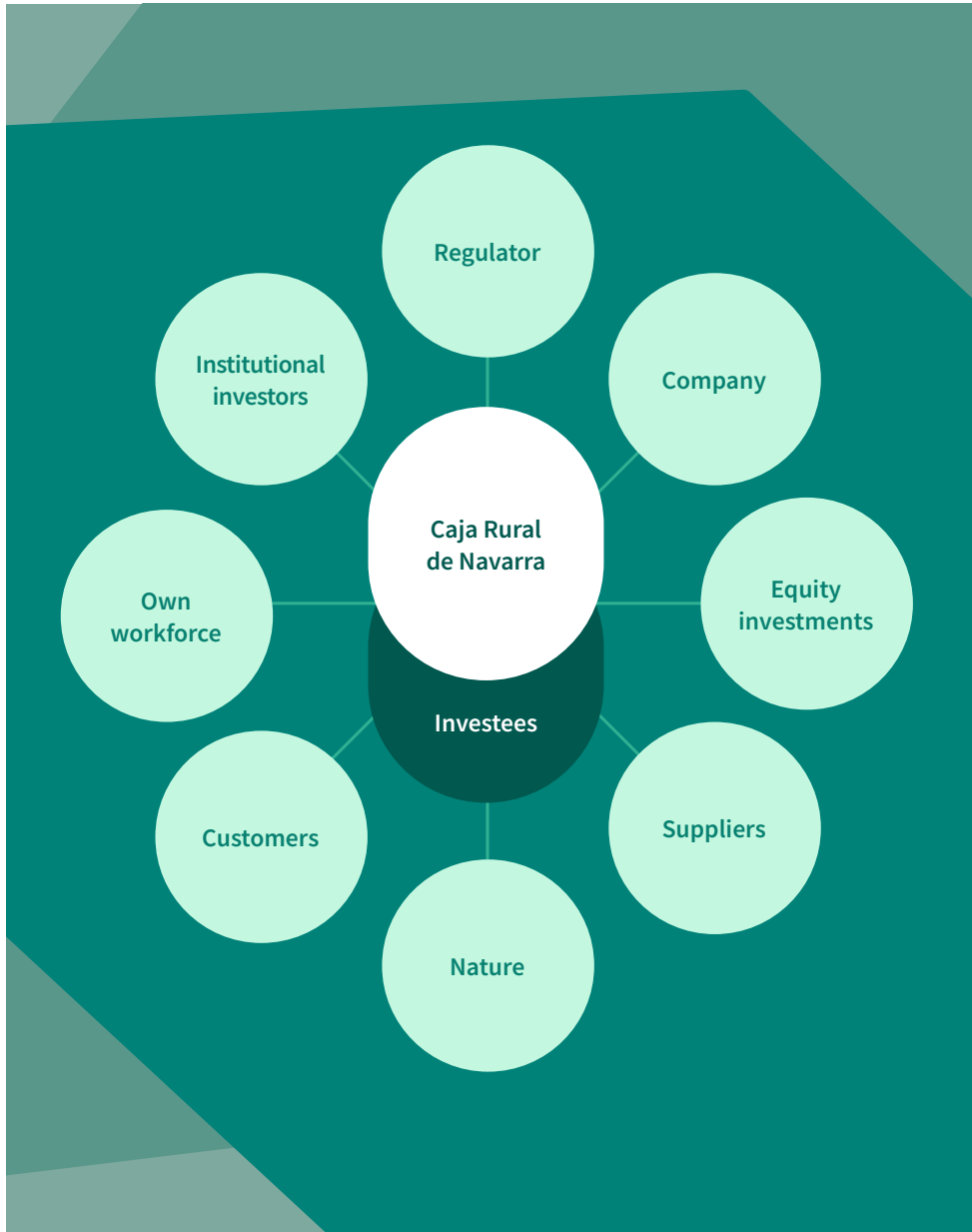
- > The Group's business model.
- > The Group's strategic priorities.
- > The Group's sustainability master plan or strategy.
- > The Group's commitment to sustainability.

### DEFINITION AND CONSTRUCTION OF THE VALUE CHAIN

This step seeks to define the value chain of Caja Rural de Navarra Group. The Group has structured its value chain in a clear and segmented way into three main areas: Upstream, Core Business and Downstream. Each of these areas is detailed below:

- > Upstream: suppliers and their activities that support the Group's operations.
- > Core Business: the core of Caja Rural de Navarra's activities, where the Group's key operations are carried out.
- > Downstream: customers who use the Group's products and services, which are the main reason for Caja Rural's activities.





## IDENTIFICATION AND DEFINITION OF STAKEHOLDERS:

This step seeks to identify and define the stakeholder groups that are relevant to Caja Rural de Navarra Group, both internally and externally. The purpose of this process is to recognise those key stakeholders whose expectations, interests and activities can directly influence the Group's strategic and operational decisions.

Stakeholder groups have been identified through a detailed analysis of the stakeholders that have a direct relationship with the entity and its investees, such as customers, employees, shareholders, suppliers and regulators, among others. Other external stakeholders, such as local communities, NGOs and governmental authorities, which may be involved in or affected by the Group's activities in terms of sustainability and corporate social responsibility, are also considered.

Once identified, the key stakeholder groups were defined, considering their interests and influence on the activities of Caja Rural de Navarra Group, as follows.

## 2. PRIORITIZATION OF RELEVANT ISSUES

This step seeks to draw up a preliminary list of potentially relevant topics and sub-topics for Caja Rural de Navarra Group, adapted in terminology and structure to its particular circumstances and business model. These topics must align with those in the ESRS (European Sustainability Reporting Standards) and with the results of the previous phase of the analysis and evaluation process. This list serves as a basis for identifying the most significant and relevant sustainability topics for the Group, enabling it to develop a coherent approach in line with regulatory and strategic requirements.

Based on the results of the previous phase, i.e. the ESG issues identified as relevant from an internal and external perspective, and after having identified the different stakeholders in the Group's value chain, a preliminary consolidated list of ESG topics and sub-topics was drawn up. This list has been adapted in terminology and structure to the particular situation and business model of Caja Rural de Navarra Group.

EFRAF provides a flexible framework for the identification of sustainability topics, but does not impose a pre-defined list. It is the responsibility of the Group to adapt the analysis to its specific context, using its own professional judgement.

In line with this approach, the list of ESRS topics, sub-topics and sub-sub-topics (ESRS 1.AR16) was taken as the departure point for the preliminary list and the additional sources analysed in Phase 1 were then added. This allowed the construction of a preliminary list of Group-specific topics and sub-topics. The work in this phase consisted of drawing up a consolidated list, taking into account the different sources analysed and the particular circumstances of Caja Rural de Navarra and its equity investments.

Once this list of relevant topics and sub-topics was defined, to create a clear image of the process, the conclusions were mapped onto a matrix that shows the relevance of each defined topic and sub-topic for the different actors in the environment.

The list of identified topics and sub-topics correlated with ESRS topics, sub-topics and sub-sub-topics is detailed below:



	ESRS Topics	ESRS Sub-topics	ESRS sub-sub-topics	Defined topics	Defined sub-topics	
A	E1 - Climate change	Climate change adaptation		Climate change	Adaptation to Climate Change	
		Climate change mitigation			Energy transition and decarbonization	
		Energy			Efficient energy consumption	
	E2 - Pollution	Pollution of air			Pollution	Pollution of air
		Pollution of water				Pollution of water
		Pollution of soil				Pollution of soil
		Pollution of living organisms and food resources				Other pollution
		Substances of concern				
		Substances of very high concern				
		Microplastics				
	E3 - Water and marine resources	Water	Water consumption	Responsible water management	Responsible water consumption and use	
			Water withdrawals			
			Water discharges			
		Marine resources	Water discharges in the oceans			
			Extraction and utilization of marine resources			
	E4 - Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Climate change	Biodiversity and natural capital	Dependencies and impact on ecosystems	
			Land-use change, freshwater and marine use			
			Impacts on the extent and state of ecosystems			
			Invasive alien species			
			Pollution			
			Impacts and dependencies on ecosystem services			
		Impacts on the state of species	Species population size			
			Global species extinction risks			
		Impacts on the extent and state of ecosystems	Land degradation			

ESRS Topics	ESRS Sub-topics	ESRS sub-sub-topics	Defined topics	Defined sub-topics
<b>A</b>	E4 - Biodiversity and ecosystems		Biodiversity and natural capital	Dependencies and impact on ecosystems
		Desertification		
		Floor sealing		
	E5 - Circular economy	Impacts and dependencies on ecosystem services	Circular economy	Circularity and waste management
		Resources inflows, including resource use		
		Resource outflows related to products and services		
<b>S</b>	S1 - Own workforce	Waste	Talent management and working conditions of own staff	Engagement, satisfaction and talent attraction
		Working conditions		
		Secure employment		
		Working time		
		Adequate wages		
		Social dialogue		
		Freedom of association, the existence of works councils and the information, consultation and participation rights of workers		
		Collective bargaining, including rate of workers covered by collective agreements		
		Work-life balance		
		Health and safety		
		Equal treatment and opportunities for all		
		Gender equality and equal pay for work of equal value		
		Measures against violence and harassment in the workplace		
		Diversity		
		Employment and inclusion of people with disabilities		
		Training and skills development		
				Health and accidents at work
				Diversity, equality and inclusion
				Training

ESRS Topics		ESRS Sub-topics	ESRS sub-sub-topics	Defined topics	Defined sub-topics	
S	S1 - Own workforce	Other labour rights	Child labour	Talent management and working conditions of own staff	Protecting and securing HR in own activities	
			Forced labour			
			Privacy			
	S2 - Workers in the value chain	Working conditions	Secure employment	Workers in the value chain	Welfare of workers in the value chain	
			Working time			
			Adequate wages			
			Social dialogue			
			Freedom of association, including the existence of works councils			
			Collective bargaining			
			Work-life balance			
			Health and safety			
		Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value			
			Training and capacity building			
			Employment and inclusion of people with disabilities			
			Measures against violence and harassment in the workplace			
			Diversity			
		Other labour rights	Child labour			Protecting and securing HR in value chain activities
			Forced labour			
			Adequate housing			
			Water and sanitation			
			Privacy			
	S3 - Affected groups	Economic, social and cultural rights of the collectives	Adequate housing	Social commitment and relationship with communities	Engagement and responsible communication with the community and affected groups	

ESRS Topics	ESRS Sub-topics	ESRS sub-sub-topics	Defined topics	Defined sub-topics
<b>S</b>		Economic, social and cultural rights of the collectives	Adequate food	Engagement and responsible communication with the community and affected groups
			Water and sanitation	
			Land-related incidents	
			Security-related incidents	
		Indigenous peoples' rights	Free, prior and informed consent	Cultural rights
			Self-determination	
			Cultural rights	
		Collective civil and political rights	Freedom of expression	Protecting and securing HR in activities of affected collectives
	S4 - Consumers and end-users	Social inclusion of consumers or end-users	Responsible marketing practices	Responsible marketing
			Non-discrimination	Financial accessibility
			Access to products and services	
		Information-related impacts for consumers and/or end-users	Privacy	Quality and safety of products and services
			Access to (quality) information	Customer relations
			Freedom of expression	
		Personal safety of consumers or end-users	Health and safety	Protecting and securing HR in customer activities
			Security of a person	
			Child protection	
<b>G</b>	G1 - Business conduct	Protection of whistleblowers	Ethics and transparency	Ethics and transparency
		Animal welfare		
		Corruption and bribery		
		Management of relationships with suppliers including payment practices	Corporate governance	Stakeholder relations
		Political engagement and lobbying activities		Governing bodies and accountable leadership
		Corporate culture		Corporate culture

ESRS Topics	ESRS Sub-topics	ESRS sub-sub-topics	Defined topics	Defined sub-topics
<b>T</b>	Transversal	Entity Specific (Responsible Taxation)	CRN-specific topics	Responsible Taxation
		Entity Specific (Cybersecurity and Data Processing)		Privacy and data security
		Entity Specific (Digitization and innovation)		Innovation and digitization of more responsible processes and services

### 3. STAKEHOLDER CONSULTATION

The main aim of this third phase is to understand the perspective of the different stakeholders on the topics and sub-topics that were identified in the previous phase. Although this consultation is not mandatory, it is considered advisable. Obtaining stakeholder views allows the Bank to validate the topics and sub-topics previously identified as potentially material to identify the impacts, risks and opportunities associated with these topics. This process helps to ensure that the topics selected adequately reflect the concerns and expectations of the Group's key stakeholders.

Phase 3 of stakeholder consultation consists of three key steps:

#### STEP 1 SELECTION OF STAKEHOLDERS TO BE CONSULTED





Based on the list of stakeholders identified and defined in Phase 1, stakeholders are selected for the consultation process in the materiality exercise. Groups linked to a high number of actual impacts or potential negative impacts (as established in ESRS

2.SBM-1) were considered. Also taken into account were previous consultations with stakeholder groups held during the year that were useful and served as a source for the double materiality assessment. In the case of subsidiaries, those with the greatest relevance in terms of economic size and number of employees were selected, in order to provide a more appropriate and accurate representation of the sustainability impacts, risks and opportunities and to ensure a comprehensive view in the double materiality assessment.

#### STEP 2 FIELDWORK

Once the stakeholder groups to be consulted have been selected, a decision had to be made on how to conduct consultations to gather stakeholder views on the ESG topics and sub-topics that the Group had preliminarily defined. The type of consultation carried out depended mainly on the characteristics of the stakeholder group to be consulted.

The main methods used were interviews and surveys. Research studies were also used in cases where it was more efficient to obtain information through public sources than through direct questions to the actor involved.

Stakeholder group	Sub-group	Recomendación de consulta
<b>Customers</b>	Companies	
	Individuals	
<b>Employees</b>	-	
<b>Suppliers</b>	-	
<b>Investees</b>	Harivenasa	
	Solera	
<b>Regulator</b>	-	
<b>ECB supervisor</b>	-	
<b>BoS regulator</b>	-	
<b>Company#</b>	-	

Results of the surveys and interviews in the Double Materiality Assessment of Caja Rural de Navarra Group for 2024 were ranked on a scale of 1 to 5, with 1 being the lowest score and 5 the highest.

#### STEP 3 ANALYSIS OF RESULTS AND CONCLUSIONS

Once the stakeholder consultations were complete, as a final step, all the information gathered was input to the matrix of relevance of topics and sub-topics.

Preliminary analysis of the results at topic and sub-topic level suggested that a topic or sub-topic could be deemed relevant (or not) when the majority of groups have indicated it as such. In addition, as a result of these consultations, a list of IROs (issues, risks and opportunities) that the stakeholders reported during the consultations could be generated.

It is important to point out that greater weighting or value was given to the results of consultations that were more representative in terms of the volume of responses and to those where the results were more reliable.



#### 4. IDENTIFICATION OF IMPACTS, RISKS AND OPPORTUNITIES

The objective of this phase was to obtain an inventory of impacts, risks and opportunities related to Caja Rural de Navarra Group and its value chain. This inventory allows the key aspects affecting the Group to be identified in a structured manner, facilitating strategic decision-making and the development of actions aligned with sustainability objectives.

The process of identifying the impacts, risks and opportunities (IROs) of Caja Rural de Navarra Group has been structured taking into consideration the activity of the Bank and its investees and the Group's value chain. Accordingly, the results of the previous phases, specifically the results of Phase 1: Context Analysis and Phase 3: Stakeholder Consultations, laid the foundations and provided the essential inputs for the identification of the IROs that affect both Caja Rural de Navarra Group and its value chain.

To ensure correct identification of IROs, it is essential to start from the concepts of impact, risk and opportunity, which are defined as follows:

- **Impact:** this refers to the effect that the Group's activities, processes, products, services or relationships have, or may have, on people or the environment over time. According to the CSRD, impact is the effect that the company has or could have on the environment and people, including effects on their human rights, both in relation to its own operations and upstream and downstream in its value chain. This impact may be actual or potential, negative or positive, intended or unintended, and may be remediable or irreparable. Impacts can occur in the short, medium or long term and reflect

the company's contribution, whether negative or positive, to sustainable development.

- **Risk:** uncertain ESG conditions that, if they materialise, could have a significant negative effect on the Group's business model and sustainability strategy, compromising the ability to achieve its stated goals and objectives. According to the CSRD, material risks are those sustainability-related risks that have negative financial effects, materially affecting (or with a reasonable likelihood of materially affecting) the company's cash flows, access to finance or cost of capital in the short, medium or long term.
- **Opportunity:** Uncertain ESG conditions that, if realised, could have a significant positive effect on the business model and sustainability strategy, facilitating the achievement of the goals and objectives set by the Group. The CSRD defines material opportunities as those that have positive financial effects, materially affecting (or reasonably likely to affect) the company's cash flows, access to finance or cost of capital in the short, medium or long term.

In order to draw up a first approximation of the impacts (impact materiality) of Caja Rural de Navarra Group and its value chain on its environment and people, we have identified those environmental, social and governance impacts that occur or may occur derived from each ESG topic and sub-topic defined in Phase 2. These consider not only the impacts caused directly by the Group's activities but also those related to its activities and services throughout its value chain.

Similarly, an approximation of risks and opportunities (financial materiality) was done for the ESG topics and subtopics defined in Phase 2. It was analysed whether and how the financial

impacts identified could affect the strategy and business model of Caja Rural de Navarra Group.

Note, on this point, that a sub-topic defined as relevant for Caja Rural de Navarra Group may have one or several associated IROs, which have to be aligned with the ESRS sub-topics. IROs were therefore identified through a meticulous analysis at ESRS sub-sub-topic level, ensuring precise alignment with the topics and sub-topics defined as relevant for the Group.

In order to identify the impacts, risks and opportunities (IROs) relevant to Caja Rural de Navarra Group, multiple sources of information were considered giving a comprehensive and detailed view of ESG (environmental, social and governance) issues. These sources include:

- The judgement and experience of professionals and experts within the organization and externally who bring specialist knowledge of ESG issues.
- The results obtained in the context analysis, which provide a solid basis of contextual information that serves to identify IROs related to the environment in which the Group operates.
- External sources, such as market trends, current regulation, and the perspectives of ESG analysts. These sources provide insight into external pressures and emerging opportunities in the context of sustainability.
- Internal Group sources, including the Corporate Social Responsibility (CSR) Report and the Non-Financial Information Report, the Sustainable Finance and ESG Risk Policy, the Environmental Policy, the Internal Governance System, the Carbon Footprint Calculation Report, the Code

of Conduct, the Remuneration Policy, and the Annual Governance Plan, among others. These sources provide information on internal sustainability practices and policies that directly impact the Group.

- Information obtained through stakeholder interviews, surveys and research is essential to understand the perspectives and concerns of key stakeholders on ESG issues.
- Sustainability initiatives such as UNEP FI, the Principles for Responsible Banking, and the Principles for Responsible Investment, which provide global policy frameworks and guidelines that are relevant to Caja Rural, were also considered.

#### 5. ASSESSMENT AND OUTCOME OF THE DOUBLE MATERIALITY PROCESS

This phase seeks to derive an assessment of the IROs (impacts, risks and opportunities) for Caja Rural de Navarra Group. Topics and sub-topics were prioritised based on the results of the IRO assessment for each.

The methodology for assessing the impacts, risks and ESG opportunities of Caja Rural de Navarra Group applies the assessment criteria established in the ESRS Standards. The identified IROs associated with each topic/subtopic/sub-sub-topic were assessed by applying the criteria in the cross-cutting standards (ESRS) according to their typology.

## A. IMPACTS

The metrics used to assess and prioritise the materiality of incidents vary depending on whether they are positive or negative, actual or potential impacts:

### Actual positive impacts:

Actual positive impacts are prioritised according to their magnitude and scope, by assessing the following metrics:

- Scale, which represents the magnitude or severity of the impact. Its value is obtained from the global data by topics/sub-topics collected through the different consultations carried out during the double materiality process. The data feeding into this metric comes from surveys and interviews with the different stakeholders, external analysis and analysts. The metric is scored on a scale from 1 to 5, with 5 being the highest value, representing greater magnitude or severity of the impact.
- Scope, which represents the extent of the impact, has three possible outcomes:
  - Global scope (scale of 5) refers to cases where the impact extends to people and/or the environment at European level.
  - Medium scope (scale of 3) refers to cases where the impact extends to people and/or the environment at the level of Spanish territory.
  - Local scope (scale of 1) refers to cases where the impact extends to people and/or the environment at the level of the Autonomous Region.

### Potential positive impacts:

Potential positive impacts are prioritised according to their magnitude, scope and likelihood, by assessing the following metrics:

- Scale (magnitude of the impact)
- Scope (extent of the impact)
- Likelihood, which represents the probability of the event occurring. The scale defined for likelihood ranges from 1 to 4 and includes the following possible outcomes:
  - Very high likelihood (scale of 5) for scenarios where there is a probability of occurrence of more than 25%.
  - High likelihood (scale of 4) for scenarios where there is a probability of occurrence of the occurrence between 15% and 25%.
  - Medium likelihood (scale of 3) for scenarios where there is a probability of occurrence of the occurrence between 10% and 15%.
  - Low likelihood (scale of 2) for scenarios where the probability of occurrence of the occurrence is between 5% and 10%.
  - Very low likelihood (scale of 1) for scenarios where there is a probability of occurrence of less than 5%.

### Actual negative incidents:

Actual negative incidents are prioritised according to their severity, extent and remediability, by assessing the following metrics:

- Scale (magnitude of the impact)
- Scope (extent of the impact)
- Remediability, which represents the difficulty in terms of time, resources and effort required to correct or reverse the harm caused by the incident. The scale is from 1 to 5 and includes the following possible outcomes:
  - Very difficult to remedy (scale of 5) is used in cases where action is required over a time span of more than 5 years, involving resources from several areas and with a regular budget line allocated.
  - Difficult to remedy (scale of 4) is used in cases where action is required over a time span of 3 to 5 years, involving resources from several areas and with a specific budget line allocated.
  - Medium Remediability (scale of 3) is used in cases where action is required over a time span of 2 to 3 years, with specific dedication of resources from the area involved and with a specific budget line allocated.
  - Easy to remedy (scale of 2) is used in cases where action is required over a period of 1 to 2 years, with specific dedication of resources from the area concerned and timely budget allocation.
  - Very Easily Remediable (scale 1) is used in cases where action is required with a time span of less than 1 year and without significant resources (either financial nor human).

#### Potential negative impacts:

Potential negative impacts are prioritised according to their severity, scope, likelihood and remediability, by assessing all the metrics described above: Scale, Scope, Likelihood and Remediability.

### B. RISKS AND OPPORTUNITIES

The metrics used to assess the materiality of Risks and Opportunities are [53 c ii]:

- Scale, which represents the magnitude or severity of the Risk or Opportunity. The value is obtained from the global data by topics/sub-topics collected through the different consultations carried out during the double materiality process. The data feeding into this metric comes from surveys and interviews with the different stakeholders, external analysis and analysts. The metric is scored on a scale from 1 to 5, with 5 being the highest value, representing greater magnitude or severity of the Risk or Opportunity.
- Economic Valuation, which represents the economic impact that the Risk or Opportunity may have on the Bank. The scale is 1 to 5, with 5 representing the highest economic impact.
- Likelihood, which reflects the probability of the Risk or Opportunity occurring. The scale of this metric is also from 1 to 5, and includes in its assessment short-, medium- and long-term time horizons, which are aligned with the definitions in the ESRS 1 standard, the short term time horizon being less than 1 year, the medium term between 1 and 5 years and the long term greater than 5 years.

### C. RESULT OF THE DOUBLE MATERIALITY PROCESS

For the prioritization of the risks identified in the double materiality process, the results obtained are sent to the relevant Committees and reported to the Governing Board. On the basis of these results, the most material risks are identified and regularly monitored by the Group.

All decisions related to identified risks are integrated into the Risk Committee functions.

The process for identifying, assessing and managing sustainability risks and impacts is fully integrated into the Group's overall risk management framework. For this purpose, the respective corporate risk scales are used, enabling sustainability risks to be assessed in a consistent and aligned manner with the criteria applied to other corporate risks. This approach ensures that sustainability risks are considered within the overall risk profile of the company, providing a holistic and harmonised view that reinforces strategic decision-making and the implementation of mitigating actions within the overall risk management framework.

The process of identifying, assessing and managing opportunities is also fully integrated into the Group's overall management frameworks. Business development teams conduct regular analyses of key macro trends that could positively impact their operations and strategies, such as sustainability. This approach aligns strategic decisions with long-term growth goals and sustainable value creation, ensuring that identified opportunities are managed in a structured manner aligned with the corporate vision.

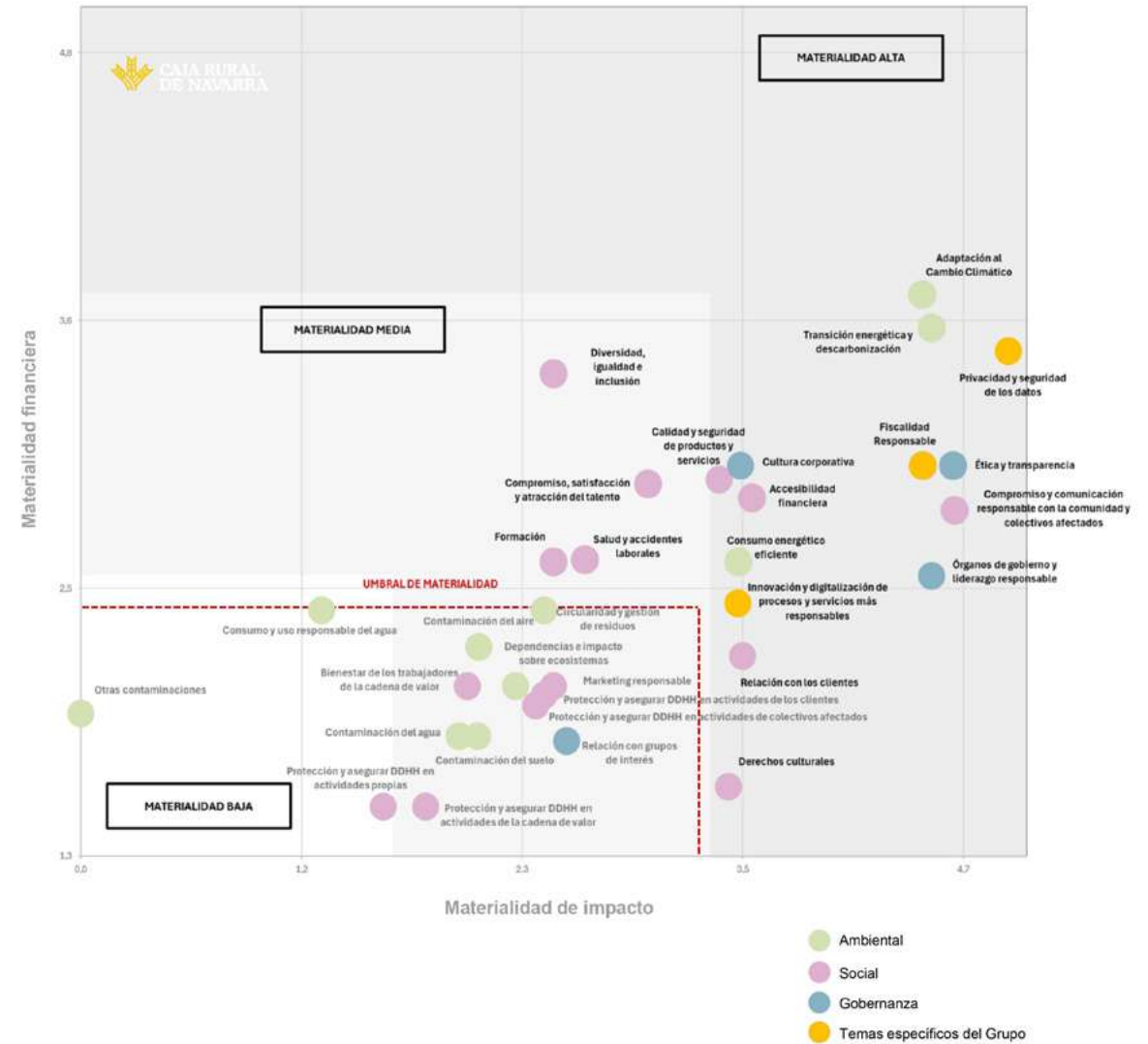
As a result of the Double Materiality process, the materiality matrix is drawn up. This is a key tool for identifying and prioritising the most relevant topics and sub-topics from two fundamental perspectives: the impact that Caja Rural de Navarra Group's activities may have on the environment and people, and the risks and opportunities that these topics represent for the Group's business model and sustainability strategy.

The materiality matrix is the result of a structured process in which the actual and potential impacts, financial risks and opportunities associated with the key sustainability areas are analysed, based on the assessments made in previous phases. The matrix makes it possible to visualise and rank issues according to their material relevance, based on the priority attributed to them by stakeholders and the Group's internal perspective.

The materiality matrix has two main axes: one that assesses the impact of the Group's activities on the environment and people, and another that measures the financial relevance of these issues for the business model and the long-term strategy of Caja Rural de Navarra Group.

Material  
Not material

	Impact materiality	Financial materiality		Global materiality
	Impact	Risk	Opportunity	Result
ESRS E1 - Climate Change	Material	Material	Material	Material
ESRS E2 - Pollution	Material	Material	Material	Material
ESRS E3 - Water and Marine Resources	Material	Material	Material	Material
ESRS E4 - Biodiversity and ecosystems	Material	Material	Material	Material
ESRS E5 - Circular economy	Material	Material	Material	Material
ESRS S1 - Own workforce	Material	Material	Material	Material
ESRS S2 - Workers in the value chain	Material	Material	Material	Material
ESRS S3 - Affected groups	Material	Material	Material	Material
ESRS S4 - Consumers and end-users	Material	Material	Material	Material
ESRS G1 - Business conduct	Material	Material	Material	Material
Specific CRN topics	Material	Material	Material	Material





## **IRO-2: Disclosure Requirements in ESRS covered by the undertaking's sustainability statement**

In order to determine the information requirements and datapoints to be reported by Caja Rural de Navarra Group, the results obtained in the double materiality process, i.e. the topics and sub-topics that have been identified as material, have been used as a starting point. In this context, the correlation established by EFRAG between the topics and sub-topics of AR 16 of ESRS 1 and the disclosure requirements of the European Commission Delegated Regulation (EU) 2023/2772 has been used in order to identify those requirements and datapoints applicable to Caja Rural de Navarra Group that must be reported in this sustainability report.

With regard to the disclosure requirements on the reporting of metrics, and following the criteria set out in paragraph 34.b of ESRS 1, a detailed analysis has been performed to determine whether the required information is material to the Group. This analysis has been performed at the datapoint level.

In addition, all mandatory disclosures have been reported, regardless of the outcome of the double materiality process. These provisions correspond to the stipulations of ESRS 2, including the topical datapoints related to the IRO-1 disclosure requirement.

Furthermore, for greater detail, a GAP analysis has been carried out, identifying the datapoints to be reported in 2025, distinguishing between those of a mandatory nature (severe) - to which this report responds - and those of a voluntary nature (optional).





# 02/

## Environmental Information

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Caja Rural de Navarra, as a group committed to sustainability and social responsibility, recognises the importance of environmental management within its corporate strategy. In this context, the CSRD Report reflects the Group's commitment to transparency, regulatory compliance and responsible management of the environmental impacts of its operations and products. This section is designed to provide a clear and detailed overview of how the Group addresses the environmental challenges it faces, the actions taken to reduce its environmental footprint and the sustainable opportunities identified in its various business areas.

Caja Rural de Navarra Group's environmental analysis not only complies with the requirements of the Corporate Sustainability Reporting Directive (CSRD), but also reflects its strategic commitment to the transition towards a low-carbon economy and achieving the UN Sustainable Development Goals (SDGs).

This environmental section covers the specific initiatives and targets the Group has set to mitigate its environmental impact, the results achieved to date and the actions planned for the short and long term. It also highlights the efforts made to integrate environmental criteria into its business strategy, products and services, ensuring that all the Group's activities are aligned with best practice in environmental governance and social responsibility.

## NEIS E1

# Climate Change

Caja Rural de Navarra Group recognises the urgency and magnitude of climate change as one of the greatest global challenges of our time. Aware of its impact not only on the environment, but also on the economy, society and the well-being of future generations, the Group has adopted a comprehensive approach to address this phenomenon as part of its sustainability strategy. Climate change is considered a key factor in strategic planning and decision-making, underlining the Group's responsibility in mitigating its effects and adapting to new climate scenarios.

This reports highlights the Group's commitment to align its operations, investments and products with the principles of sustainability and with the global objectives of reducing greenhouse gas emissions, as set out in the Paris Agreement. Caja Rural de Navarra Group integrates the risks and opportunities arising from climate change into its business model, developing initiatives that contribute to a low-carbon economy and promote energy transition in the communities where it operates.

This section details the concrete actions, adaptation strategies and results achieved in managing climate risks, reflecting the proactive role the Group plays in creating a more resilient future in the face of the effects of climate change.

## GOVERNANCE

### NEIS E1 GOV-3: Integration of sustainability-related performance in incentive schemes

At present, Caja Rural de Navarra Group does not have climate-related considerations specifically incorporated into the remuneration of members of the governance, management and supervisory bodies. However, the Group is working this year to integrate such climate considerations into its remuneration structure, without altering incentives based on previous strategic commitments. It is important to note that, although this integration has not yet been implemented, the Remuneration Policy already includes provisions related to ESG (environmental, social and governance) criteria, reflecting the Bank's commitment to sustainability and the alignment of its strategies with the principles of corporate social responsibility.

## STRATEGY

### ESRS E1 SBM-3: Material IROs and their interaction with strategy and business model

Caja Rural de Navarra Group, aware of the current challenges arising from sustainability and climate change, has strategically integrated the identification, assessment and management of material impacts, risks and opportunities (IROs) within its business model. This process has been carried out through an exhaustive analysis that has considered both the environmental, social

and governance (ESG) impacts and the economic and financial variables that affect the Group and its operations. In this way, the Group has been able to identify which aspects of the environment, both internal and external, are of significant material importance and how they interrelate with the Group's strategic objectives and day-to-day business.

Through a double materiality process, Caja Rural de Navarra Group has identified the material IROs which, due to their magnitude and scope, have a direct impact on its activities and financial results. The assessment of these impacts has not only enabled the Group to comply with current regulations, but has also led to a deeper understanding of the areas that require specific attention, such as environmental risk management and the transition to a low-carbon economy derived from its activities. The IROs identified include both physical risks related to climate change and those associated with the transition to more sustainable business models.

In terms of material risks, the Group has analysed the potential implications of fluctuations in financial markets, sustainability-related regulations, and changes in consumer and stakeholder expectations. Regulatory risks are particularly relevant as the Group is subject to local and international regulations, which require continuous adaptation to comply with sustainability disclosure requirements. The transition to a green economy and the potential impacts on its investment portfolios, such as the mortgage portfolio, are factors that have also been thoroughly assessed.

On the other hand, the Group has also identified a number of opportunities that can be leveraged to generate long-term sustainable

value. These opportunities include boosting sustainable finance, which is aligned with the UN Sustainable Development Goals (SDGs), as well as strengthening its role in financing projects related to energy transition and climate change adaptation. Specifically, the Group is working to expand its offering of green and sustainable financial products, which support reductions in greenhouse gas emissions and the transition to a lower carbon economy.

The integration of these IROs with the strategy and business model of Caja Rural de Navarra Group has been achieved by clearly aligning sustainability goals with the financial strategy. The Group has understood that climate and environmental risks not only represent a challenge, but also a strategic opportunity that can improve the competitiveness and resilience of its operations. In this regard, the action plans derived from this integration seek not only to minimise negative impacts on the environment, but also to position the Group as a key player in promoting sustainability in the financial sector.

As a result, Caja Rural de Navarra Group has identified the following impacts, risks and opportunities as material for the Group:

ESG	Description	IRO	Tipe	Theme	Value Chain
Environmental	Promote the operational security and stability of infrastructure, especially in sectors such as mobility and sustainable transport, by offering financial solutions that promote investments in climate-resilient infrastructure and develop innovative financial products designed to manage the risks associated with climate events.	Impact	Current	E1 Climate change	Downstream
Environmental	Entry into force of new regulations requiring changes in financial advice and customer communication procedures due to the growing importance of ESG criteria in investment decision-making.	Risk	Positive	E1 Climate change	Downstream
Environmental	Entry into force of new regulations that establish taxes and restrictions on economic activities that have a negative impact on climate change adaptation.	Risk	Regulatory and legal	E1 Climate change	Downstream Core Business
Environmental	Disciplinary measures for companies that engage in greenwashing or green-hushing.	Risk	Regulatory and legal	E1 Climate change	Downstream
Environmental	Growing environmental awareness is driving profound changes in the preferences of consumers and other market players, forcing companies to rethink their business models to adapt to this new reality.	Risk	Market	E1 Climate change	Downstream Core Business
Environmental	Lack of accurate and reliable data prevents the development of robust statistical models to assess the potential impacts of climate and environmental risk factors.	Risk	Technologists	E1 Climate change	Downstream Core Business
Environmental	Systematic integration of climate factors into credit and investment risk assessment processes, with the aim of quantifying and managing the financial impacts of climate change.	Opportunity	Funding	E1 Climate change	Downstream Core Business
Environmental	Optimising operational costs by improving the resilience of the Group's physical infrastructure to extreme weather events.	Opportunity	Resilience	E1 Climate change	Downstream Core Business
Environmental	Increased carbon footprint from customer financing in carbon-intensive sectors.	Impact	Resilience	E1 Climate change	Downstream Core Business
Environmental	Boosting the energy transition and boosting key economic sectors through financing and investment vehicles for decarbonization projects.	Impact	Potential	E1 Climate change	Downstream Core Business
Environmental	Non-compliance with GHG reduction targets set by the Bank.	Risk	Negative	E1 Climate change	Downstream Core Business

ESG	Description	IRO	Tipe	Theme	Value Chain
Environmental	Poor performance in energy transition and decarbonization can result in a negative image and/or loss of corporate reputation.	Risk	Reputational	E1 Climate change	Downstream Core Business
Environmental	Encouraging initiatives to transition to self-consumption of renewable energy as part of its carbon footprint reduction strategy.	Opportunity	Efficiency in the use of resources	E1 Climate change	Downstream Upstream
Environmental	Strengthening the Group's reputation for decarbonising the portfolio, achieving set targets and supporting partners in their decarbonization efforts.	Opportunity	Reputational	E1 Climate change	Downstream Core Business
Environmental	Promotion of energy efficiency measures to reduce energy consumption and associated costs.	Impact	Current	E1 Climate change	Downstream Upstream
Environmental	Compliance with regulations that penalise less energy-efficient economic activities or dwellings with poor energy ratings.	Risk	Positive	E1 Climate change	Core Business
Environmental	Development of energy efficiency training programmes for all employees.	Opportunity	Regulatory and legal	E2 Pollution	Downstream Core Business
Environmental	Financing and investment activities in sectors with a high environmental impact, generating air pollution and environmental degradation, affecting people's quality of life and health.	Impact	Efficiency in the use of resources	E2 Pollution	Downstream Core Business
Environmental	Promoting sectoral policies to reduce air pollution, avoiding funding and investment in activities with a high risk of environmental impact.	Impact	Potential	E2 Pollution	Downstream Core Business
Environmental	Increased credit risk/loss of market value due to lack of integration of environmental risks in the assessment of financing and/or in the search for investment opportunities.	Risk	Negative	E2 Contaminación	Downstream Core Business

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### IRO-1: Description of the process to identify and assess material impacts, risks and opportunities related to the climate

To identify and assess the impacts, risks and opportunities (IROs) related to climate change, Caja Rural de Navarra Group has adopted a rigorous and structured methodology, which allows a thorough understanding of these aspects and their relevance for the strategic and operational development of the savings bank. This methodology is based on a multidimensional analysis, which integrates various sources of information, and active consultation with the main stakeholders to obtain a holistic and accurate view of the nature and scope of the IROs.

From an impact perspective, a detailed analysis of the external environment was conducted, considering both regulatory aspects and industry trends in sustainability. This analysis included a review of local and international policies and regulations related to climate change, as well as the identification of emerging trends within the financial sector and other key sectors in which the Group operates. In addition, the different phases of the Group's value chain were assessed, from acquisition of resources to delivery of products and services to customers, with the aim of identifying any potential implications deriving from climate change, such as fluctuations in raw material prices, changes in regulatory expectations or impacts stemming from extreme weather events.

From a financial perspective, the Group assessed the exposure of its business activities to IROs associated with climate change. This meant identifying the presence or absence of risks and opportunities related to climate change, depending on the nature of the Group's operations. Particular emphasis was placed on investment opportunities in sustainable products and green finance, as well as risks arising from exposure to sectors vulnerable to the effects of climate change, such as those related to energy or agriculture.

An analysis of the Group's sites and its value chain was also carried out, looking at how climate change could affect the location of key operations or infrastructure in the future. Possible future scenarios that could modify the relevance of aspects related to climate change were assessed, taking into account emerging trends such as adaptation to new regulations, the advance of green technology and the impact of extreme weather events on the Group's operations.

### NEIS E1-1: Transition Plan

At present, Caja Rural de Navarra Group does not have a formal transition plan. However, the Group is fully aware of the strategic importance of having a transition plan that drives adaptation to climate change and contributes to global sustainability goals. It is therefore actively working to develop such a plan and expects to have it in place within the next few years. This plan will be key to aligning its activities with emission reduction targets and the transition to a low-carbon economy, ensuring that all strategic and operational decisions are geared towards long-term sustainability.

### ESRS E1-2: Policies related to climate change mitigation and adaptation.

Caja Rural de Navarra Group has put in place various policies related to climate change mitigation and adaptation, aligned with its sustainability strategy and international sustainable finance objectives. These policies are designed to reduce the environmental impact of its operations, support the transition to a low-carbon economy and ensure greater resilience to climate risks. The key policies that the Group has adopted in this regard are described below:

#### A. SUSTAINABLE FINANCE FRAMEWORK

Caja Rural de Navarra's Sustainable Finance Framework sets out a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Group is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainability, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.

#### B. ENVIRONMENTAL POLICY

Caja Rural de Navarra Group's Environmental Policy sets clear guidelines for management and reduction of the environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Group's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.

#### C. ESG RISK POLICY

Caja Rural de Navarra Group's ESG (environmental, social and governance) Risk Policy establishes a framework for managing the risks associated with ESG factors from its operations and strategic decisions. This policy's principal goal is to identify, assess and mitigate risks deriving from climate-related regulatory changes, the physical risks from extreme weather events and opportunities arising from the transition to clean energy and sustainable project finance. The policy also enshrines a commitment to integrate ESG criteria into all the Group's investment decisions and activities, ensuring mitigation and adaptation strategies are aligned with the goals of sustainability and the transition to a low-carbon economy.

## D. ESG RISK RATING

Caja Rural de Navarra Group was awarded an updated ESG rating in January 2025 by Sustainalytics, one of the world's leading sustainability rating agencies. The Bank achieved a rating of 12, meaning it is classed as low risk, acknowledging its strong performance in the management of environmental, social and governance factors. This rating reflects the Group's commitment to integrating environmental, social and governance criteria into its corporate strategy. The ESG Risk Rating focuses on risks and opportunities that may affect the profitability and sustainability of operations, considering factors such as climate change exposure, regulatory risks and sustainable investment opportunities. It also gives a clear view of Caja Rural de Navarra's positioning in terms of risk management and adaptation to climate change.

## E. RISK APPETITE FRAMEWORK

Caja Rural de Navarra has also defined a set of sustainability indicators under its MAR (Sustainability Indicators Framework) system, to measure how far it is meeting its climate commitments and sustainability targets. These indicators make it possible to quantify the impact of environmental policies and fulfilment of the climate goals set, as well as providing a basis for informed decision-making on future projects and alignment with long-term sustainability targets.

At the subsidiaries, environmental sustainability policies are configured through two converging axes: certain customers demand continuous improvement actions (type of packaging, guarantees of origin, better agricultural practices); and the Bank sets out carbon footprint goals and calculation methodologies so the subsidiary can identify the most appropriate actions in response.

In addition, in compliance with Royal Decree 56/2016, the Group undergoes energy audits covering most of its consumption, which helps identify which investments can help reduce the Group's environmental impacts.

## ESRS E1-3: Climate change mitigation measures

Caja Rural de Navarra Group recognises the urgency and responsibility of contributing to the fight against climate change, and as part of its sustainability strategy, has implemented a series of mitigation actions to reduce greenhouse gas (GHG) emissions and promote the transition to a low-carbon economy. These actions are essential to ensure the Group meets global sustainability commitments, such as those set out in the Paris Agreement, and to align its operations with international and national climate policies. The main mitigation initiatives implemented by the Group are described below:

### A. INTEGRATING SUSTAINABLE FINANCE INTO CORPORATE STRATEGY

One of the main mitigation actions carried out by Caja Rural de Navarra Group is the promotion of sustainable finance through its Sustainable Finance Framework. This framework aims to mobilise financial resources for green projects, focused on reducing carbon emissions and promoting energy efficiency. By issuing green bonds, the Bank facilitates access to financing for projects that directly contribute to climate change mitigation, such as renewable energy, reforestation, sustainable management of natural resources and waste reduction projects.

The Group has also implemented financial products such as sustainable loans, targeted at customers who wish to finance initiatives that help reduce their carbon footprint, such as energy efficiency, clean technology and climate change adaptation projects. This approach not only encourages sustainable investment, but also promotes the transition to a more resilient, low-carbon economy.

### B. OPTIMIZATION OF ENERGY CONSUMPTION AND USE OF RENEWABLE ENERGY

As part of its mitigation actions, Caja Rural de Navarra Group has taken various initiatives to reduce energy consumption and promote the use of renewable energy in its operations. In a drive to optimise energy use in its factories, buildings and offices, the Group has brought in energy-saving technologies, including more energy-efficient processes, low-consumption lighting systems, efficient electronic equipment and the digitization of processes to reduce dependence on physical energy.

The Group has also continued work done in previous years to increase the proportion of renewably sourced electricity used in its facilities. This has included the adoption of solar thermal energy in the subsidiaries of the healthcare sub-group and the progressive installation of photovoltaic systems at the subsidiaries' work centres, with the aim of reducing emissions from their energy consumption and shrinking their carbon footprint.

We would like to point out that the environmental impact of energy used by Caja Rural and its subsidiaries is offset by the activities of some of the equity associates outside the consolidated group (25-50% shareholdings):

- Compañía Eólica de Tierras Altas, S.A., which has four wind farms with 99 MW of renewable electricity capacity in Soria.
- Renovables de la Ribera, which brought online four wind farms in August 2020, totalling 111 MW of capacity in the south of Navarra.



### C. REDUCING THE CARBON FOOTPRINT IN THE VALUE CHAIN

The Group has also implemented measures to mitigate climate impacts in its value chain, working closely with its suppliers and customers to identify opportunities to reduce emissions. These measures include integrating climate criteria into the processes for selection and evaluation of products and services that have a lower environmental impact. This creates a bias toward buying products that are sustainable and environmentally friendly, reducing the overall impact of the Group's operations.

In addition, customers have been encouraged to adopt more sustainable practices through financial solutions that promote the energy transition, such as loans for energy efficiency projects and the financing of renewable energy systems. The same approach is applied to life-cycle management of the Group's products and services, with the aim of minimising environmental impact through all stages of their development, use and final disposal.

### D. IMPLEMENTING CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICIES WITH A CLIMATE FOCUS

As part of its corporate social responsibility (CSR) policies, Caja Rural de Navarra Group has integrated into its strategy actions aimed at mitigating climate change, such as tree planting and reforestation projects, which not only help to reduce carbon dioxide (CO<sub>2</sub>) in the atmosphere, but also contribute to the preservation of biodiversity and the improvement of local ecosystems.

Through its Environmental Policy, the Group has established clear procedures for waste management, promoting the reduction, reuse and recycling of materials in all its operations. This policy also sets targets for a reduced water

footprint and improved management of natural resources.

### A. MEASUREMENT AND MONITORING OF EMISSIONS

Caja Rural de Navarra Group has implemented systems for measuring and monitoring greenhouse gas (GHG) emissions generated by its activities. These systems allow for continuous monitoring of direct and indirect emissions, in order to identify areas for improvement and ensure that emission reduction targets are being met. Transparent measurement and accurate reporting of emissions is essential to maintain the Group's commitment to climate change mitigation and to comply with international regulations.

### F. SUSTAINABLE FINANCING FRAMEWORK FOR THE CREDIT PORTFOLIO

Caja Rural de Navarra has implemented a Sustainable Financing Framework for its loan portfolio. The aim is to promote financing with a social and environmental impact in the regions where it operates, in line with the priorities of its social projects. This Framework is aligned with the ICMA's green, social and sustainability bond principles, as well as the EU Taxonomy and APLMA, LMA and LSTA Green Bond and Social Bond Principles. Funds raised through sustainable bonds and loans made under the Framework are used to promote green and social projects, supporting the Paris Agreement and the UN SDGs.

### ESRS E1-8: Internal carbon pricing

Given its business activity and the nature of Caja Rural de Navarra Group, there is currently no internal carbon price. However, the Group recognises the importance of incorporating systems that favour the transition towards a low-carbon economy and the integration of environmental factors into its corporate strategy. In this regard, the Group is looking into using tools such as internal carbon pricing to align its practices with global sustainability goals and best practice in climate risk management. As new strategies and approaches are developed in this area, the Group will work to integrate carbon considerations into its investment decisions and the management of its operations.

## METRICS AND TARGETS

### ESRS E1-4 Targets related to climate change mitigation and adaptation

Caja Rural de Navarra Group is fully committed to climate change mitigation and adaptation, recognising that climate change is a global challenge that requires concerted and proactive action. As part of its sustainability strategy, the Group has set clear and measurable targets to contribute to the reduction of emissions and promote the transition to a low-carbon economy, while ensuring that its operations are resilient to the impacts of climate change.

Regarding its "own" or "corporate" carbon footprint (scopes 1, 2 and 3 excl. financing and investment), to help minimize its environmental impact and continue progressing towards a sustainable economy, Caja Rural de Navarra Group has a target to cut its own carbon footprint by 20% between 2021 and 2025. This target reflects the Group's commitment to sustainability and the decarbonization of its operations. In 2024, the reduction in carbon-intensity compared to 2021 was 3.7%.

As with its corporate activities, when it comes to the carbon footprint of the loan portfolio, the Group is firmly committed to promoting the transition to a sustainable economy and the decarbonization of its investments. To this end, intermediate decarbonization targets have been set, with a time horizon of 2030, taking 2023 as the base year. These targets refer specifically, in terms of emissions (tCO<sub>2</sub>eq), to the residential mortgage loan portfolio, given its high materiality in terms of volume of exposure.

As the table shows, an emissions reduction target of 18% was set for the period 2023 to 2030, and this year a reduction of 9.89% has already been achieved.

In addition, as mentioned above, when it comes to financed emissions the Group continues to develop a sustainable product range that channels resources toward investments that help cut greenhouse gas emissions. This approach helps its customers and society in general to be part of the transition to a low-carbon economy.

Portfolio / Sector	Scope	Base year 2023	Base year 2024	Target year 2030	Decarbonization target	Unit
Residential Mortgage Portfolio	1 + 2	80.005,02	72.088,79	65.604,12	18%	tCO <sub>2</sub> eq

In the long term, taking as a reference point the final horizon of the Paris Agreement (2050), Caja Rural de Navarra Group does not currently have tools and data that would allow it to establish more precise measurements and objectives. However, it reiterates its firm commitment to achieving climate neutrality by 2050. In this sense, all the aforementioned goals should be seen as paving the way toward this long-term commitment.

It should be noted that the above targets are a first approximation, based on incipient methodologies and with a considerable load of estimated data. Therefore, these targets will be reviewed annually and whenever else circumstances demand, such as if methodologies evolve or new data becomes available.

In pursuit of these goals, the Group's decarbonization strategy is based on the following pillars:

- Promotion of "green" housing finance
- Green asset products, such as financing of electric vehicles, installation of solar panels, energy efficiency upgrades, etc.
- ESG rating/scoring for business customers and investment portfolio.
- Participation in renewable energy financing projects.
- Sustainable investment funds.
- Investment in green and sustainable bonds.

These actions are aligned with the Group's global strategy to reduce its environmental impact and foster the transition to a sustainable, low-carbon economy, while continuing to ensure responsible and environmentally committed economic growth.

### A. TARGETS FOR IMPROVEMENT



Mitigation targets	Units	2024	2023	Base year	Quantity base year	Reductions	Expected target
Carbon footprint intensity, 20% reduction in Caja Rural de Navarra, S.C.C. between 2021 and 2025.	tnCO2eq/€m	0,104	0,101	2021	0,108	-3,70%	0,0864
Carbon footprint intensity, 5% reduction at investees between 2022 and 2026	tnCO2eq/€m	646	699	2022	857	-24,60%	814,15

## ESRS E1-5 and E1-6: Energy Consumption and Mix and Gross Emissions in Scopes 1, 2, 3 and Total Greenhouse Gas Emissions.

### Calculation of the carbon footprint

Caja Rural de Navarra Group, for historical reasons, has a range of equity investments in companies that complement or service its financial business, but it also has a portfolio of companies active in industrial sectors:

The companies that operate outside the financial sector, grouped by sector, are detailed in the section "[BP-1] Basis for preparation of the Report".

#### A. CALCULATION METHODOLOGY

Climate change has emerged as one of the most significant global issues facing us today, with a broad consensus among the scientific community and policy makers that increasing greenhouse gas (GHG) emissions as a result of human activities are driving global warming. In this context, establishing metrics to understand, measure and reduce the impact of human activities on the atmosphere has become an international priority.

At the global level, the GHG Protocol, developed by the World Business Council for Sustainable Development in collaboration with the World

Resources Institute, has been the benchmark standard for both emissions inventories (scopes 1 and 2) and carbon footprint measurement (scope 3). ISO/UNE 14.064 for emissions inventory and ISO/UNE 14.069 for carbon footprint calculation provide the standardised basis for the measurement, offsetting and reduction of GHG emissions in organizations. In Spain, the Ministry for Ecological Transition has developed various guides and calculators for quantifying the carbon footprint, and has a voluntary registry for companies wishing to register their emissions. For further details regarding the calculation of the Carbon Footprint, please consult the Report on the Calculation of the Carbon Footprint, dated 6 March 2025, which covers Caja Rural de Navarra and Group companies.

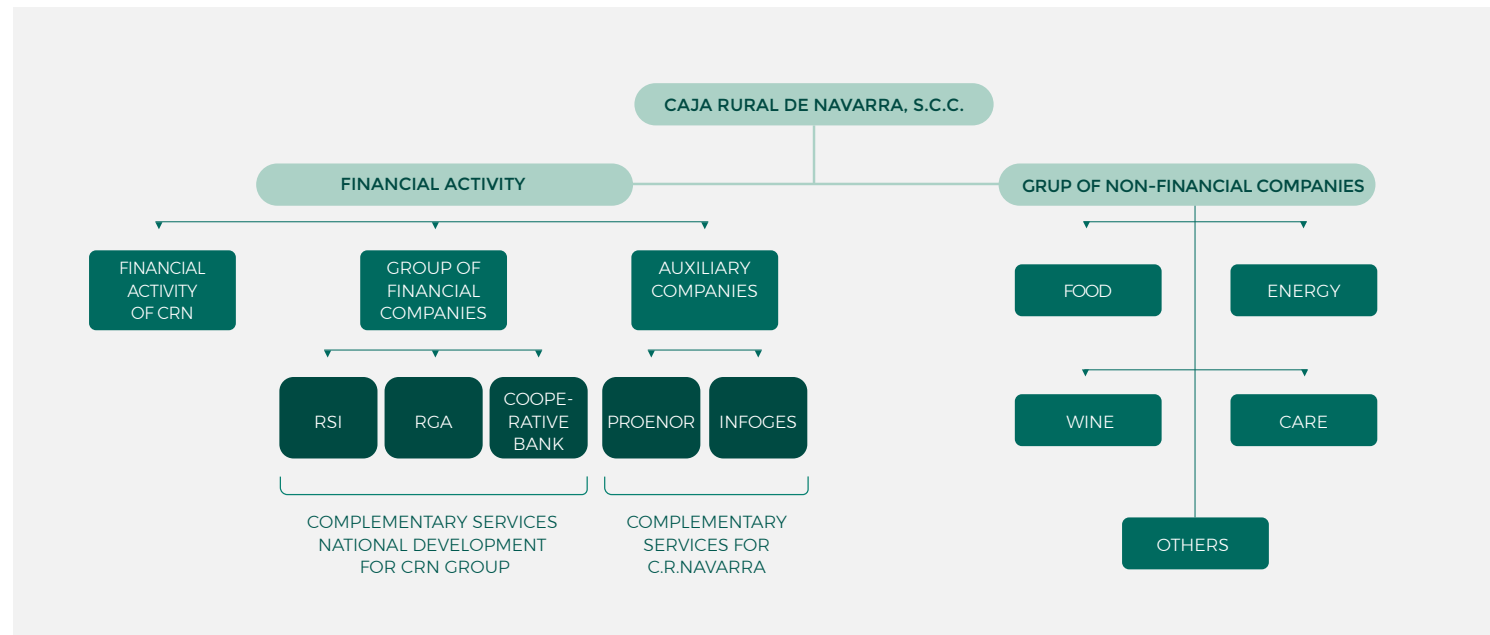
Caja Rural de Navarra Group, which is aligned with these standards, has not submitted its carbon footprint calculation to the Ministry's registry nor has it undergone a carbon audit, either this year or last. However, it has chosen to follow the GHG Protocol methodology for calculating its carbon footprint, which enables it to measure the emissions generated by the Group's activity in a manner consistent with international standards.

The carbon footprint can be calculated both at the level of a specific product (assessing GHG emissions throughout the product's life cycle, from the procurement of its raw materials to its final disposal or recycling) and at the organizational level, as is done in this report. The objective is to measure the GHG emissions generated directly or indirectly throughout the Group's operations during a given period, usually the fiscal year.

The GHG Protocol methodology classifies emissions into three scopes:

- **Scope 1:** direct emissions under the Group's control, such as those generated by machinery and fleet vehicles, and leaked emissions of refrigerant gases.
- **Scope 2:** indirect emissions from electricity consumption.
- **Scope 3:** other indirect emissions, such as those associated with outsourced transport fleets, purchased raw materials and business travel.

Once the volume of each gas emitted has been determined, a conversion factor is applied to convert it into CO<sub>2</sub> equivalent units, which facilitates comparison and monitoring of emissions over time.



The Group is also exploring ways to offset the GHG emissions generated. One of the ways to mitigate the carbon footprint of electricity consumption (Scope 2) is through the purchase of renewable energy or renewable energy certificates. In the case of Caja Rural de Navarra Group, renewable energy certificates are redeemed against one of the energy meters at the head office.

The carbon footprint can also be offset through tree planting initiatives on forest land or in areas that have been affected by fire, although this method cannot be applied at Group level. For the calculation of the carbon footprint, its scope is limited to Group companies that are under the direct or indirect control of Caja Rural de Navarra Group, as defined in article 42 of the Code of Commerce, including all those with a shareholding of more than 50%.

In 2024, Explotación Agrícola Las Limas, a company that manages a farm owned by Caja Rural de Navarra Group where rice is grown, was included for the first time. This new addition to the emissions scope marks an important step in the measurement of the Group's carbon footprint.

## B. SCOPE AND EMISSIONS

### CAJA RURAL DE NAVARRA

- **Scope 1:** direct emissions in Caja Rural de Navarra come mainly from its financial business, as the Bank does not have its own vehicles or boilers. Consequently, emissions in this scope are mainly associated with leaks of refrigerant gases from air conditioning equipment.
- **Scope 2:** indirect emissions generated by the consumption of electricity in the Bank's facilities are offset through the purchase of guarantees of renewable origin, which contributes to reducing

the environmental impact derived from energy consumption.

- **Scope 3:** emissions induced by the activity of Caja Rural de Navarra, but emitted by third parties, include:

- Emissions by employees commuting to work, measured by a mobility survey of employees and extrapolated to the entire workforce.
- Emissions from employees traveling as part of their job, calculated on the basis of the travel reported by employees to the company.
- Emissions caused by waste from business activity and water consumption.
- Emissions derived from the outsourcing of IT processes to RSI, which provides IT services for the whole Caja Rural group.
- Emissions caused by the transport of the Bank's goods, such as courier services and the transport of cash, estimated by the courier company that manages these services.

### SUBSIDIARIES

- **Scope 1:** direct emissions generated by the investees include natural gas consumption, emissions from each company's own vehicles, as well as refrigerant gas leaks from the annual recharging of air-conditioning equipment.
- **Scope 2:** indirect emissions from electricity consumption are partially mitigated by the redemption of renewable guarantees at manufacturing sites and the savings made thanks to photovoltaic self-generation.

- **Scope 3:** emissions induced by the activities of investees include:

- Emissions generated by employees' commuting to work, obtained through mobility surveys carried out in each company or through estimates provided by HR department
- Emissions caused by employee travel for their job, calculated from travel recorded and reported by employees.
- Emissions caused by waste from business activity and water consumption.
- Emissions generated by the transport of raw materials and finished products, both from the supplier to the factory and from the factory to the customer. In cases where the customer collects the product from the factory, no emissions are assigned to this scope 3 item.
- Emissions from purchased raw materials, especially cereals, which has a significant impact on greenhouse gas emissions.

In terms of emissions attributable to agricultural raw materials, the following are particularly noteworthy:

- **Explotación Agrícola Las Limas, S.L.:** this company, linked to the Caja Rural de Navarra's Education and Development Fund of, grows rice in Tudela, on agricultural land near the river Ebro. Rice, as a crop, generates methane emissions during its growth phase. Emissions from this crop are allocated to Scope 3 of the Group's carbon footprint.
- **HARIVENASA, S.L.:** Producer of oat flakes, pearl barley and oat flour, whose carbon footprint comes from both the cultivation of oats and the transport of the raw material to the factory. In

2023, a conversion factor based on data from ADEME (France) was used, resulting in an increase of 17 kT CO<sub>2</sub>eq compared to the previous year.

- **Tonnellerie de L'Adour e Industrial Tonelera de Navarra, S.L.:** for the first time, the carbon footprint associated with the production of oak, a tree which, although considered a CO<sub>2</sub> sink in some countries, generates emissions during its production, has been included in scope 3. Unlike its approach elsewhere, the Group does not consider this production process as reducing carbon equivalent emissions.

- **Bouquet Brands:** the carbon footprint of the goods (wine, water, spirits) received at its premises has not been considered, as the suppliers are responsible for shipping them to the corresponding warehouses.

In this regard, it should be noted that Industrial Tonelera de Navarra, S.L. has an annual programme to offset its scope 1 and 2 greenhouse gas (GHG) emissions. Offsetting is done through oak reforestation projects, actively contributing to the restoration and conservation of the natural environment. In particular, the company supports reforestation plans led by several municipalities in the Navarre Pyrenees, participating in local initiatives that promote the regeneration of forest areas and strengthen biodiversity in the region.

## C. CONVERSION FACTORS

The same emission factors are used in each line for the parent company and subsidiaries.

Each of the carbon footprint tables specifies the corresponding emission factor and its source. Preferably, conversion factors provided by the Spanish Ministry for Ecological Transition and Demographic Challenge are used. As a secondary source, data from the UK Ministry or IHOBE are

used, and in some specific cases, Scope 3 factors are obtained from the Agence de l'Environnement et de la Gestion de l'Energie (ADEME) in France. In exceptional circumstances, non-official but sufficiently robust data sources are used.

Note that the figure for the largest source of emissions, cereals used in Harivenasa processes, has undergone a change compared to last year. This is due to the switch from using data provided by the public company owned by the Government of Navarre, INTIASA, to the official data of the French Government. Note too that employee travel and transport by lorry and ship have been calculated using the DEFRA 2023 tables. For the emission

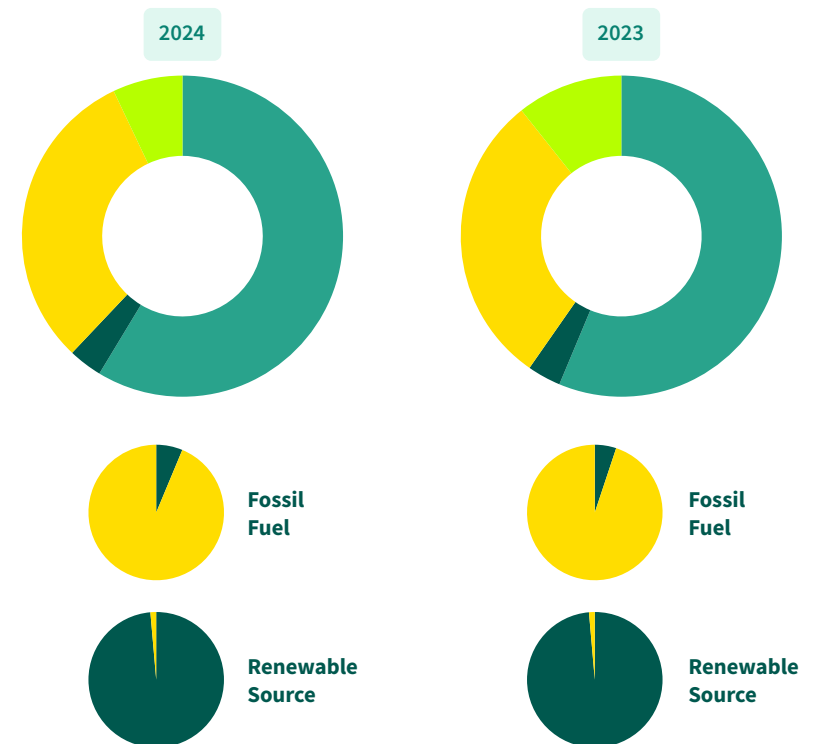
factors for passenger cars, the Scope 1 data for medium-sized passenger cars has been used, which is very similar to the value published by other sources and higher than the equivalent for Scope 3.

#### D. QUANTIFICATION

Quantitative metrics for energy consumption:

En relación con las emisiones de GEI brutas de alcance 1, 2 y 3, el Grupo Caja Rural de Navarra presenta los siguientes indicadores:

Caja Rural de Navarra Group		2024	2023
1	Fuel consumption from coal and coal derivatives (MWh)	0	0
2	Fuel consumption from crude oil and petroleum products (MWh)	1.330	1.029
3	Fuel consumption from natural gas (MWh)	19.803	19.111
4	Fuel consumption from other fossil fuel sources (MWh)	0	0
5	Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	0	0
<b>6</b>	<b>Total fossil energy consumption (MWh) (sum of lines 1 to 5)</b>	<b>21.133</b>	<b>20.140</b>
Share of fossil sources in total energy consumption (%)		57%	56%
<b>7</b>	<b>Fuel consumption from nuclear sources (MWh)</b>	<b>1.224</b>	<b>1.210</b>
Share of nuclear sources in total energy consumption (%)		3,30%	3,30%
8	Fuel consumption by renewable source, such as biomass (including also industrial and municipal biowaste, biogas, renewable hydrogen, etc.) (MWh)	0	0
9	Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	10.982	10.452
10	Consumption of self-generated renewable energy that is not used as fuel (MWh)	148	146
<b>11</b>	<b>Total renewable energy consumption (MWh) (sum of lines 8 to 10)</b>	<b>11.130</b>	<b>10.598</b>
Share of renewable sources in total energy consumption (%)		30%	30%
<b>12</b>	<b>Non-nuclear and non-renewable electricity consumption (MWh)</b>	<b>2.539</b>	<b>3.820</b>
<b>TOTAL ENERGY CONSUMPTION (MWh) (SUM OF LINES 6 AND 12)</b>		<b>36.889</b>	<b>35.767</b>



Emissions (tCO2eq)	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
Scope 1: Direct GHG emissions and removals						
Direct emissions from mobile combustion	-	293,4	293,4	-	234,38	234,38
Direct emissions from stationary combustion	-	3.634,60	3.634,60	-	3.501,41	3.501,41
Direct fugitive emissions caused by the release of GHGs in anthropogenic systems	243,59	18,05	261,64	39,23	3,1	42,33
Direct process emissions (agricultural crops)	-	742,09	742,09	-	N/A	N/A
Biogenic emissions	-	268,04	268,04	-	N/A	N/A
Scope 2: Indirect GHG emissions from imported energy						
By location method	1.071,90	445.333,72	446.405,62	N/A	N/A	N/A
By location method	0	1.123,20	1.123,20	0	1.304,04	1.304,04
Scope 3: Indirect GHG emissions from transport						
Emissions from upstream transport for goods	-	6.608,00	6.608,00	-	8.259,32	8.259,32
Emissions from downstream transport and distribution of goods and inland transport (armoured and bagged)	112,45	2.114,84	2.227,30	46,11	1.794,68	1.840,79
Emissions caused by business travel	274,88	41,53	316,41	332,19	12,03	344,22
Emissions from employees commuting from their homes to their workplaces	996,41	346,61	1.343,02	1.086,14	312,98	1.399,12

Emissions (tCO2eq)	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
Scope 3: Indirect GHG emissions from products used by the organization						
Emissions from purchased goods and services (cereal purchase, data storage and processing)	52,51	68.273,47	68.325,98	64,16	61.834,32	61.898,48
Emissions from waste management	113,01	123	236,01	68,31	55,24	123,55
Scope 3: Indirect GHG emissions associated with the use of products from the organization						
Emissions from water consumption:	0,91	10,4	11,31	1,42	13,58	15
Total non-biogenic emissions (location method)	2.865,67	537.331,12	540.196,79	N/A	N/A	N/A
Total non-biogenic emissions (market method)	1.793,76	83.329,26	85.123,02	1.637,56	77.325,51	78.963,07
Total biogenic emissions	-	268,04	268,04	-	N/A	N/A



Further details on scope 1 emissions from fuels consumed in own vehicles, fuels allocated to the process and refrigerant gases by the Caja Rural de Navarra Group:

2024			
Scope 1 Emissions	Caja Rural de Navarra	Investees	Total
<b>Fuels consumed in own vehicles</b>			
Diesel A litres	0	100.606,00	100.606,00
Diesel B litres	0	14.225,00	14.225,00
Petrol litres	0	1.986,00	1.986,00
<b>Fuels allocated to the process</b>			
Natural gas kWh	0	19.802.804,00	19.802.804,00
Propane kg	0	10.271,00	10.271,00
<b>GHG emissions from air-conditioning</b>			
R-407-C kg recharged gas	0	0	0
R-410A kg recharged gas	107,5	8	115,5
HFC-134a kg recharged gas	0	0	0
R-32 kg recharged gas	1	0	1

Scope 2 emissions (market method) and self-generation:

2024			
Emissions Scope 2	Caja Rural de Navarra	Investees	Total
<b>Electricity Consumption</b>			
Annual consumption, kWh	4.122.664,00	11.485.720,00	15.608.384,00
Of annual consumption, with guaranteed renewable origin, kWh	4.123.000	6.859.000	11.485.000
Self-generation	0	148.026,00	148.026,00
tCO2eq by market method	0	1.123,00	1.123,00

Breakdown of Scope 3 emissions:

Emissions Scope 3 (tCO2eq)	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
Commuting to work	996,41	346,61	1.343,02	1.086,14	312,98	1.399,12
Business travel	274,88	41,53	316,41	332,19	12,03	344,22
Water consumption	0,91	10,45	11,36	1,42	13,58	15
Office supplies and waste	113,01	123	236,01	68,31	55,24	123,55
Transport of raw materials	-	6.608,00	6.608,00	-	8.260,00	8.260,00
Raw materials	-	68.273,47	68.273,47	-	61.340,82	61.340,82
RSI	52,51	-	52,51	64,16	-	64,16
Security vans and cash bags/ transport of goods	112,46	2.114,84	2.227,30	46,11	1.794,68	1.840,79
TOTAL	1.550,17	77.517,90	79.068,07	1.598,33	72.282,58	73.880,91

Carbon intensity has been calculated by dividing the total carbon footprint emissions (scopes 1, 2 and 3) in tCO2eq by total assets:

Emissions Scope 3 (tCO2eq)	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
Carbon footprint, scopes 1, 2 and 3 (tCO2eq)	1.705,00	83.602,00	85.307,00	1.638,00	77.326,00	78.963,00
Total assets (€m)	17.306,00	129,00	17.435,00	16.205,00	111,00	16.315,00
Carbon footprint intensity (tCO2eq/€m)	0,10	648,08	4,89	0,10	699,15	4,84

## ESRS E1-7: Greenhouse gas removals and greenhouse gas mitigation projects financed by carbon credits.

The Group is not currently active in the carbon credit market or in the Energy Saving Certificates (ESC) market. However, a tree planting project is being carried out as part of its Acción Social, although it is still awaiting certification of the CO<sub>2</sub> rights generated by this activity.

Also, the equity investment INTONA is part of a consortium with several municipalities in the Navarre Pyrenees involved in a project that promotes the sustainable planting and exploitation of European oak. Each year, this project generates CO<sub>2</sub> equivalent removal credits equal to the Bank's scopes 1 and 2 carbon footprint. These credits contribute to mitigating its carbon footprint in parallel with efforts to reduce emissions.

Although the Group does not participate in the market for carbon credits or energy saving certificates, it is developing initiatives that help mitigate CO<sub>2</sub> emissions through tree planting and CO<sub>2</sub> removal projects through the sustainable exploitation of natural resources.

## INFORMATION ON THE EU TAXONOMY REGULATION (2020/852)

Caja Rural de Navarra is obliged to comply with the disclosure requirements in Regulation (EU) 2020/852 of the European Parliament and Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088. This regulation was enhanced by Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation. In addition, Regulations (EU) 2023/2485 and 2023/2486 came in to supplement Regulation (EU) 2020/852. This section presents the information required by these Regulations for each of the constituent Groups. A key point to note is the entry into force of the European green taxonomy, which created a system of technical criteria and requirements to assess how far financing transactions comply with the taxonomy for companies subject to the Non-Financial Reporting Directive (NFRD). As from 1 January 2024, this directive obliges all financial institutions to calculate and publish the percentage of their exposures that are aligned with the taxonomy, i.e. their Green Asset Ratio (GAR). Also, as in previous years, institutions need to publish the coverage of the GAR and qualitative information and indicators required by these regulations.

Under Delegated Regulation (EU) 2021/2178, the Green Asset Ratio or GAR applies exclusively to entities classified as financial institutions. It is therefore not calculated at Group level but only

for Caja Rural de Navarra as an individual financial institution subject to this obligation.

According to the compliance schedule published in the Regulation, as of 1 January 2025, financial institutions are only obliged to report taxonomy information for the 6 environmental objectives, which are: 1) climate change mitigation and 2) climate change adaptation. The four new objectives are: 3) pollution prevention and control, 4) transition to a circular economy, 5) sustainability and protection of water and marine resources and 6) protection and restoration of biodiversity and ecosystems. Entities must report both their eligible and aligned exposures with these objectives.

Eligible activities are those contained in the aforementioned Regulation, regardless of whether or not they meet the technical criteria to be considered aligned.

With regard to the analysis of alignment (and therefore the analysis of what the entity considers to be green for the purposes of the GAR or Green Asset Ratio), there are a few points to note regarding the calculation methodology:

- The GAR is limited to the 6 environmental objectives set out in Article 9 of the Regulation. These are: 1) climate change mitigation and 2) climate change adaptation. Plus the four new objective: (3) pollution prevention and control, (4) transition to a circular economy, (5) sustainability and protection of water and marine resources and (6) protection and restoration of biodiversity and ecosystems.
- The disclosure of Caja Rural de Navarra's taxonomy alignment is based (as regards unspecified financing of legal entities) on data provided by its counterparties (collected in cooperation with a third party for non-financial counterparties only, as financial institutions have not yet reported their

taxonomy alignment at year end). Clearly, this limits the data available.

- Besides verifying compliance with the technical screening requirements for whether an activity contributes to the objective, a complex task in itself that sometimes demands considerable expertise, an exposure or activity can only be considered taxonomy-aligned if it fulfils the principle that it must "do no significant harm" (DNSH, i.e. not impair any of the other objectives) and applies minimum social safeguards. The Bank takes the view that, as it is only involved in the projects and activities as a third party facilitator and plays no direct part in their execution but merely provides finance, and, as it is frequently difficult or impossible for the Bank to determine and collect the information on whether the DNSH and safeguarding conditions have been met, it is reasonable to conclude that an activity is compliant if it is originally subject to Spanish legal regulations, which are harmonised with European rules.

As a result, nearly all the exposures that the Bank has deemed to be green and taxonomy-aligned are either, a) mortgages on buildings with grade A energy ratings (built after 2021) or buildings with grade A, B, C and D ratings (built before 2021 but which meet the criterion of being 15% more efficient than the benchmark building standard), or b) the share of the Group's financing to counterparties that corresponds to their proportion of taxonomy-aligned revenue or capex. Regarding energy performance certificates, it should be noted that, despite using proxies or simulated energy efficiency certificates for unrated buildings (based on an audited methodology using an independent third party), the Bank has only used actual ratings to analyse alignment. Notwithstanding the above, the Bank has made its best efforts to ensure the information disclosed is as reliable as possible and as and when it has better criteria or interpretation guidelines, will follow best practice in the sector

and refine the calculations to always provide as accurate a picture as possible of the degree of taxonomy alignment.

For categories related to financing a specific proposal or defined project, the Bank is developing a range of green products that promote and incentivise the transition to a sustainable economy and will collect the data to demonstrate their compliance with the technical screening criteria for alignment with the taxonomy.

Finally, it should also be said that, – leaving aside the above-mentioned limitations, the complexity of the regulations and the lack of guidelines for its interpretation – the representativeness and comparability of the GAR is by definition heavily conditioned by its nature and the exclusions applied, especially for SMEs which make up a big

proportion of the Caja Rural de Navarra's lending mix and, being excluded from the NFRD, are counted in the denominator but not the numerator for the ratio. Equally, readers should be aware that just because an activity falls outside the scope of the European taxonomy or fails to meet all its requirements, this does not mean it is harmful or has a negative environmental impact.

The GAR (by turnover) of Caja Rural de Navarra is **4.31%** based on all assets covered as required by regulations.

The GAR (by fixed asset investments - capex) is **4.47%** based on all assets covered.

*Note: Both percentages are taken from the GAR Summary template in the RSI report.*

The Bank's exposure to economic activities related to fossil gas and nuclear energy is virtually zero.

	Total environmentally sustainable assets (Turnover)	Total environmentally sustainable assets (Capex)	KPI (Turnover)	KPI (capex)	% coverage (over total assets)
Green Asset Ratio (GAR)	581.618.254,88	603.242.300,72	4,31%	4,47%	76,60%
Climate Change Mitigation (CCM)	580.727.208,86	601.866.166,58	-	-	-
Climate Change Adaptation (CCA)	181.756,00	177.730,54	-	-	-
Water and Marine Resources (WTR)	654.828,68	1.178.002,78	-	-	-
Circular economy (EC)	54.461,34	20.400,82	-	-	-
Pollution (PPC)	0	0	-	-	-
Biodiversity and ecosystems (BIO)	0	0	-	-	-

## ESRS E2 Pollution

IRO-1: Description of the process to identify and assess material IROs related to pollution

To identify and assess its impacts, risks and opportunities (IROs) related to pollution, Caja Rural de Navarra Group carried out a detailed analysis of the available indicators and parameters related to the previously defined sub-topics, such as air, water and soil pollution, etc. The process sought to understand

the Bank's current situation regarding pollution of the environments in which it operates. The assessment also looked at the siting of the Group's most significant assets to identify possible risks and opportunities arising from their geographical location.

In addition, a study was carried out on the materials used in the production of products and services supplied to customers of Caja Rural de Navarra and its subsidiaries.

This identification and assessment process was enhanced by seeking the views and perspectives of

relevant stakeholders. Consultations were held with the different stakeholders, in which pollution-related issues were addressed and possible impacts, risks and opportunities were identified. Their concerns and views were then incorporated into the assessment process.

The activities carried out by both the Bank and the Group companies are not considered to be particularly polluting in a direct way.

Here we present a qualitative analysis of the different forms of pollution and how to respond to them,

always focusing on the processes and activities being carried out, without going into the production of raw materials or the uses of the products, which will be analysed briefly below.

The OCA measurements of emission sources at Harivenasa in 2024 were compliant.

Given the activities of Caja Rural de Navarra Group, the volume of possible microplastic emissions is unknown.

Type of pollution	Caja Rural, Financial activity	Cereal sector	Winery services	Senior care services	CRN support services
Water (Discharges)	Faecal discharges to sewage system	Limited to purges (compressors, towers) Faecal to sewage system	Limited to purges (compressors, towers) Faecal to sewage system	Faecal discharges to sewage system	Faecal discharges to sewage system
Ground (Waste)	Paper, etc.	Packaging and scrap by-products, etc.	Packaging and scrap by-products, etc.	Packaging by-products and food waste, etc. Waste with possible biological contamination	Paper, etc.
Atmosphere (Emissions)	Leakage of air-conditioning units	Essentially carbon dioxide from the need for heat in certain processes, plus, even if filters are in place, dust from silos and grain cleaning (1) Leakage of air-conditioning units	Leakage of air-conditioning units	Leakage of air-conditioning units	Leakage of air-conditioning units
Indirect emissions (air and soil)	Electricity consumption Employee travel and services to residents	Electricity consumption Employee travel and delivery of products	Electricity consumption Employee travel and delivery of products	Electricity consumption Employee travel and services to residents	Electricity consumption Commuting
Noise	Minimal, office activity	24h/day grinding process Truck traffic Location in industrial estate	Truck traffic Factory location in industrial estate	Minimal, residential activity	Minimal, office activity
Light	None	Limited to the lighting of factories operating 24h/day	None	None	None

Industrial and sanitary activities are subject to national, regional and sectoral environmental regulations. The following work is being done to reduce pollution in each sector:

## Financial sector

- Maximum digitization of processes and reduction of paper and toner
- Refurbishment of older air conditioning equipment to achieve higher energy efficiency and lower GHG leakage
- Optimization of the flow of documentation and supporting paperwork between central services and offices
- Minimization of employee commuting

## Cereal sector

Efforts are made to procure raw materials locally to each factory, but only 30-50% can be sourced within a reasonable radius.

Spain produces far less cereal than it consumes, and in the case of oats, most of the national production is of seed for animal feed.

Thus, almost a decade ago, an initiative was launched to encourage the production of wheat and oat seeds for food use within a radius of about 200 km from each factory. This initiative focuses on promoting the cultivation of certain variants by farmers in these areas, on renting land for Group companies to farm, and on long-term partnerships with farmers who continue to farm as before, but with seeds supplied by the Group.

However, not all climates and terrains are suitable for growing the best species for human consumption at a reasonable cost, and animal feed and human food compete for this production capacity, so the shortfall is likely to persist.

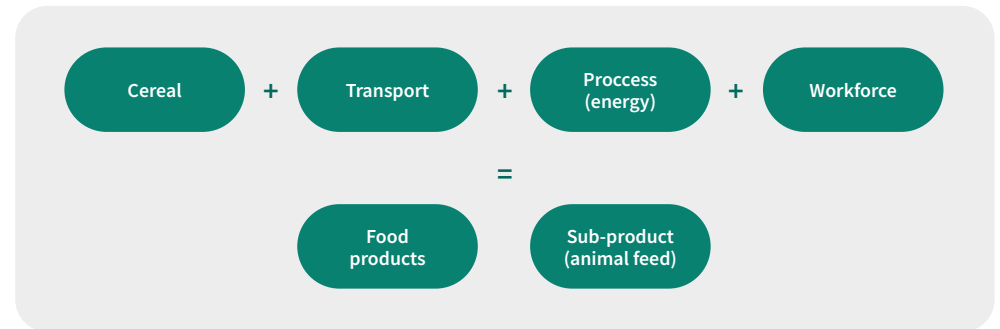
As mentioned above, the AENOR-certified sustainable crops programme has also been launched, with the support of agricultural cooperatives and certain customers.

This shortfall in domestic cereal production means that the entire plant residue (straw, seed husks, bran, etc.) from the factories can be sold to local feed mills due to the high demand for this product throughout the country.

As a result, the most suitable raw material is selected for each customer's product requirements (e.g. biscuit flour is completely different from bread flour) and is transported to the factory by lorry from its point of origin (Spain or France) or from the port (origins in Baltic countries, Great Britain, Sweden, Finland, etc.).

To reduce the environmental impact of electricity consumption, in December 2018 the Bank's flour group signed a long-term electricity purchase contract. Harivenasa took this over this when it started up its new factory in Etxarren. Among other goals, the agreement aimed to help set up two wind farms to supply Harivenasa with energy from the second half of 2020, providing approximately 70% of its estimated electricity consumption.

Harivenasa works under ISO 14001 procedures and is ISO 14001 certified. Waste generation is very low in this sector, and mainly non-hazardous. The waste generated is derived from broken pallets, plastics and paper from sacks that cannot be used in the process, which are recycled, and, among the most polluting waste, sawdust or soil mixed with



fuel or oil to be recovered if there is a spillage in a lorry.

In parallel, a major investment effort has been made in recent years to upgrade the truck fleet to the current Euro6 standard, the highest possible environmental rating.

## Winery services group

The group consists of two companies manufacturing wine barrels and casks, and a distributor of wine, beer and spirits, so the main raw material is oak wood

Oak is sourced from the USA, France and Spain. The European and American oak species have a different grain size, which brings the oak aromas to the wine in different ways. For this reason, some winemakers opt for one source, others for another, and others for mixing ageing, racking from one type of barrel to another.

Spain is also short of oak wood and INTONA (Navarre) buys in a significant percentage of its production from the USA. However, the French cooperage works with indigenous varieties.

We would highlight the approach of INTONA, which works with PEFC-qualified oak wood and is recertified annually as having a zero carbon footprint based on offsetting its carbon footprint in the factory with a project to plant sessile oak in the Navarre Pyrenees. In this way, the cooperage, besides offsetting its emissions, collaborates in the creation of a mass of sessile oak that will, in the future, furnish it with the quality raw material it needs for its barrels.

As for the waste from the production of the barrels – leftover wood fragments, shavings and sawdust – some is burned, following the traditional method, for the toasting of the barrels, and the rest is sold for reuse, generally for the production of pellets. Waste is also generated from broken wooden pallets and plastic industrial packaging, which is recycled.

As for Bouquet Brands, its business requires the purchase of wines and spirits from across Spain. But, in all the company's branches, regional wines account for 60-70% of the wines sold.

The main waste is glass from broken bottles, and waste generated by broken wooden pallets and plastic from industrial packaging, which is recycled.

In terms of actions to reduce environmental impact, Industria Tonelera de Navarra, S.L. has commissioned the installation of a roof equipped with 100 kWh of photovoltaic energy at its Monteagudo facilities. It fed 61 MWh of excess generation into the grid in 2024 and 70 MWh in 2023.

## Senior care group

Services in this sector are always inevitably local.

When it comes to Reduce, Reuse and Recycle, this is a sector that is very sensitive to health needs, and therefore much of its consumables are necessarily perishable.

The rest is waste from its accommodation and catering activities: worn out textiles, glass, cardboard and waste oils, all of which are recycled. In the two nursing homes of this group, hybrid equipment was installed in 2022 which, in an integrated manner, produces hot water to reduce gas consumption and photovoltaic electricity to reduce electricity consumption.

## CRN support services

Consumables used by these two companies in their respective offices are reported together with those of Caja Rural de Navarra, whose premises they share.

In each of the Group's companies, Environmental Management is integrated with the production issues studied by the Management Committee without, to date, a specific Committee having been set up for this purpose.

## Targets for improvement

The Caja Rural Group has set carbon targets that focus on reducing the various factors that contribute to its footprint, which means that direct and indirect pollution must be reduced if these targets are to be achieved.

The target for improvement is based on the carbon intensity of the footprint. This means the business can still grow provided it improves its carbon footprint per unit produced. Quantitatively, the targets set were:

- Caja Rural de Navarra, parent company, 20% reduction in carbon intensity between 2020 and 2025
- Equity investments, 5% reduction in carbon intensity between 2022 and 2025.

Caja Rural de Navarra Group does not produce, use or distribute substances of concern or substances of very high concern. Similarly, the Group's management considers that there are no significant financial effects arising from risks and opportunities related to material pollution.

## ESRS E3

# Water and Marine Resources

## IRO-1: Description of the process to identify and assess material IROs related to water and marine resources

As part of the process of identifying and assessing impacts, risks and opportunities related to water and marine resources, Caja Rural de Navarra Group has carried out an exhaustive analysis of the location of its main assets in order to identify both actual and potential impacts, risks and opportunities. This analysis has focused particularly on the Group's dependence on water resources, also considering the impact that access to these resources could have on other sectors of society.

A relevant aspect of this analysis was water consumption and management in the investees, as it was initially perceived as an issue of considerable impact. However, once integrated into the Group's consolidated reporting, given to the weight of Caja Rural de Navarra in the Group's structure, this issue was not considered material. Despite this, Caja Rural de Navarra Group will continue to carry out detailed monitoring of the IROs identified in relation to water and marine resources, given that these are at the limit of the materiality threshold. This is because – even assuming only an average impact on the financial business, including that related to the farming world – the weight of cereals in the consolidated subsidiaries and equity-reported associates is significant and several years of drought in Spain have generated clear pressures which, though asymmetrical by region, nonetheless have repercussions across the whole national sector. In addition, Spain has a shortfall in cereal production - both for human consumption and animal feed - and in dairy products, so that local shortages are supplemented by imports that do not always originate in EU countries.

As an example, the group's cereal processing companies have been working for years in two areas. First, it has been identify the seeds (wheat, oats) most suitable for the food products we produce and marketing these seeds to cooperatives and farmers in the areas where these crops are most viable.

Second, a company has been created to develop our own crops, on leased plots or through farmers who continue to maintain their farms but work with our seeds and methods, in various regions of Spain, Romania and Bulgaria.

In terms of metrics, the consumption of treated water in the Caja Rural (parent company) in 2024 was 5,929 m3 (8,046 m3 in 2023), while consumption in the subsidiaries was 68,239 m3 (76,746 m3 in 2023). The Las Limas rice farm, on the other hand, takes its irrigation water untreated from the river Ebro.

Finally, we would also like to highlight at this point the work that has been done to certify – with AENOR – a programme of sustainable crops, with the traction of certain customers and the support of the agricultural sector, now in its third production season.

Undoubtedly, intense climate change will have a major impact on the Spanish economy, in which tourism directly accounts for 15% of GDP and partly mitigates the trade deficit. Spain's tourist offer must be attractive not only for its sunshine, but also for its quality, and a stay cannot be satisfactory if there are water restrictions on swimming pools, gardens, etc. In the areas where Caja Rural de Navarra has financial influence the lack of water is less evident. This is partly because they are in the rainy north, close to the Bay of Biscay, partly because of environmental awareness: work has been done, at public demand, to maintain good treatment and recycling systems for urban and industrial waste and concern for the water cycle dates back to the 20th century. Even so, the Spanish and European economies are closely intertwined, and population movements inevitably have an effect.

In addition, an assessment of the Group's activities has been carried out, using a similar methodology, to determine how the Group's operations could impact other members of society's access to water



resources, as well as how its activities could be affected by extreme weather events related to water and marine resources.

The identification and assessment of impacts, risks and opportunities has also been enriched by considering the opinions and perspectives of the stakeholders involved. In this sense, consultations have been carried out in which water and marine resources have been specifically addressed, which has allowed the views and concerns of the affected groups to be incorporated into the analysis.

## ESRS E4 Biodiversity and ecosystems

### IRO-1: Description of the process to identify and assess material IROs and dependencies related to biodiversity and ecosystems

As part of the process to determine and assess the impacts, risks and opportunities related to resources, biodiversity and ecosystems, Caja Rural de Navarra Group has carried out a detailed analysis of its most relevant assets, with the aim of

identifying both actual and potential impacts on biodiversity and ecosystems.

With regard to the facilities of Caja Rural de Navarra (parent company) and its subsidiaries, and especially the subsidiaries sited outside the urban environment, the location of and activities in the Group's assets are subject to approval and supervision by the public authorities, which assess and monitor their potential impact on key ecosystem services, such as the supply of fresh water and air quality in their areas of operation. Neither the authorities nor the Group's management have identified any such impact.

Therefore, it can be concluded that the Caja Rural Group has no significant impact on biodiversity and ecosystems.

It should be noted that 27% of the territory of Navarre, 14% of the territory of the Basque Country and 36% of the territory of La Rioja are protected by the Red Natura 2000 network. The area of direct action of the Group is an area of high ecological awareness, and actions on the ground are closely regulated.

Caja Rural, through its Acción Social based around the Education and Development Fund, protects biodiversity and the ecosystem in two complementary ways: the Reforestation Plan, implemented through agreements in the three Autonomous Regions where we work, and, often overlapping, volunteering projects by staff, promoting visibility and social awareness to safeguard our environment. Similarly, collaboration agreements have been struck with agricultural and stock-raising cooperatives, one of whose areas of action is the integration of best practice into the development of their agricultural and stock-raising activity.

Caja Rural de Navarra can never forget that its origins lie in the cooperatives that combined commercial farming with the financing of its members at the dawn of the last century. Although it has been many decades since its agricultural and financial activities went their separate ways, our shared origin and values help in the spirit of maintaining our rural environment in the best conditions, but without demagogy and with realism, because people who live and work in the countryside produce our most basic sustenance, food.

## ESRS E5 Resource use and the circular economy

### IRO-1: Description of the process to identify and assess material IROs related to resource use and the circular economy

As part of the process of identifying and assessing impacts, risks and opportunities related to the use of resources and the circular economy, Caja Rural de Navarra Group carried out an exhaustive assessment of the waste generated in its facilities, whether from inputs or from the internal production of its business activities. This analysis not only considered the types of resources and waste generated, but also the way in which the Group manages this waste once it has been produced and how it is disposed of.

The methodology used for high-level waste monitoring allows the Group to plot the path of each resource through the production process, ensuring all resources and waste that may have similar treatment characteristics can be dealt with



in the same way. This comprehensive approach makes it easier to identify the impacts, risks and opportunities related to the use of resources and the implementation of circular economy principles within the Group.

The Group understands that the foundations of the circular economy require proximity, reducing the need for products, reuse and recycling. Each of the five activity groups (financial and the four sub-groups of the equity investments) have to take a different approach to this and although this point was not material in the analysis carried out, we would like to give a brief overview of our approach at Group level. All the companies in the Group Caja Rural de Navarra reuse resources wherever possible and, above all, send used products that cannot be reused for recycling, either through companies that take care of this or through specific urban collection containers.

Waste produced during the Group's activities has been documented in the calculation of the scope 3 carbon footprint.

By volume, the biggest share is paper consumption, which ends up at our customers' homes (used for commercial documentation but also for food sacks) and almost all of it is recyclable, although its recycling does not depend on us. The next largest item is used packaging, paper and cardboard packaging, plastic packaging and wooden packaging (pallets). All of these are recycled.

The Bank consumed 2,647 units of toner in 2024, of which 2,568 were in recycled toner containers (97%).

In industrial companies waste is disposed of through an authorised waste manager, and at smaller operational units, such as bank branches, through urban recycling containers. In addition, there are specialised collections such as those of

Solera's biological material containers, which are taken to incineration.

Metrics for waste generated at the Bank's subsidiaries are listed below, with data in kilogrammes, except for toner in units:

15 01 01 Paper and cardboard packaging	<b>53,327.00</b>
15 01 02 Plastic packaging	<b>11,991.45</b>
15 01 03 Wood packaging	<b>53,620.00</b>
15 01 10* Mixed packaging	<b>46,372.00</b>
15 02 02* Absorbent materials	<b>150.00</b>
16 01 17 Ferrous metals	<b>3,580.00</b>
16 01 18 Non-ferrous metals	<b>18,880.00</b>
Removal of Solera biological containers	<b>425.90</b>
Paper, kilos bought	<b>79,717.62</b>
Original toner	<b>231.00</b>

At the end of the day, leftover food in nursing homes and day care centres is disposed of in the organic waste bin. The regulations on food use in this type of centre prevent a better use of leftover food.

In addition, the views and perspectives of affected stakeholders have been considered in the identification and assessment of these aspects. Through consultations with these groups, the use of resources and the circular economy have been included as key topics in the discussions, allowing us to derive possible impacts, risks and opportunities related to these fundamental aspects of the Group's sustainability strategy.

03/

# Social information

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## ESRS S1

### Own workforce

#### STRATEGY

##### SBM-2: Interests and views of stakeholders

**[DP 12, AR5]** Caja Rural de Navarra Group recognises its own workforce as a key stakeholder group, whose views, interests and rights are fundamental in shaping the Group's strategy and business model. Below we detail how employees' perspectives are incorporated into decision-making.

Caja Rural de Navarra Group fosters an atmosphere of transparency and participation through open and accessible communication channels to facilitate two-way dialogue between management and employees, including regular meetings, working environment surveys, suggestion boxes and internal digital platforms, ensuring that employees feel listened to and valued.

Employees' opinions and suggestions are valued as a precious resource to identify opportunities for improvement in our processes and services, thus actively encouraging participative innovation, creating an environment where employees feel empowered to propose new ideas and solutions. This collaborative approach allows us to adapt quickly to market changes.

Therefore, all opinions and suggestions collected through the different communication channels are carefully analysed and considered in strategic decision-making. To ensure that employees' concerns and proposals are taken into account, feedback reports summarising key points and

recommendations are produced. This process ensures that the employee voice is an integral component in the planning and execution of the Group's strategies.

In order to better understand the working environment and staff satisfaction levels, Caja Rural de Navarra carried out a survey of all its employees in 2024, as part of the double materiality assessment. This process was fundamental, as employees represent one of the most significant stakeholder groups for the Group, as was identified in the aforementioned assessment. The double materiality assessment not only allows us to gauge the impact of the organization on its employees, but also to understand how working conditions, the work environment and other internal factors influence employee satisfaction, productivity and well-being. Through these surveys, valuable information was gathered on employee perceptions in areas such as working conditions, career development opportunities and work-life balance.

The results obtained are used to identify areas for improvement and implement corrective or strengthening measures, with the aim of promoting a more positive and collaborative work environment. By directly reflecting the needs and expectations of staff, these results become a key tool for adjusting human resources policies and updating talent management and workplace well-being strategies.

To ensure compliance with the Group's commitments to employees, regular audits and reviews are conducted. These assessments make it possible to identify areas for improvement and adjust policies and practices accordingly, strengthening the relationship with employees and ensuring that their rights and needs are effectively met. Through this process of continuous improvement, Caja Rural de Navarra Group

reaffirms its commitment to transparency, fairness and employee welfare.

Caja Rural de Navarra Group is committed to maintaining an open and constructive dialogue with its employees, recognising their fundamental role in building a sustainable and successful organization.

##### SBM-3: Material IROs and their interaction with strategy and business model

**[DP 14, 15, 16]** Caja Rural de Navarra Group, aware of the current challenges arising from sustainability and social issues, has strategically integrated the identification, assessment and management of material impacts, risks and opportunities (IROs) within its business model. This was done through an exhaustive assessment that considered both the environmental, social and governance (ESG) impacts and the economic and financial variables that affect the Group and its operations. In this way, the Group has been able to identify which aspects of the environment, both internal and external, are of material importance and how they interrelate with the Group's strategic goals and day-to-day business.

Through its double materiality process, Caja Rural de Navarra Group identified the material IROs which, due to their magnitude and scope, have a direct impact on its activities and financial results. The assessment of these impacts not only enabled the Group to comply with current regulations, but also led to a deeper understanding of the areas that require specific attention, such as the management of the social risks derived from its activities. The IROs identified include both physical risks related to the Group's own workforce and those related to communities and affected groups, as well as customers and end-users.

In terms of material risks, the Group analysed the potential implications of fluctuations in financial markets, sustainability-related regulations, and changes in consumer and stakeholder expectations. Regulatory risks are particularly relevant as the Group is subject to local and international regulations, which require continuous adaptation to comply with sustainability disclosure requirements.

In addition, the Group has identified a number of opportunities that can be leveraged to generate long-term sustainable value. These include driving forward with sustainable financing, which is aligned with the Sustainable Development Goals (SDGs), and strengthening its role in fostering a working environment that promotes non-discrimination on the basis of gender, origin, race, disability, religion or sexual orientation, as well as funding/investment projects to protect the local communities in which it operates, including social volunteering.

The integration of these IROs with the strategy and business model of Caja Rural de Navarra Group has been done by clearly aligning sustainability goals with the financial strategy. The Group has understood that social risks not only represent a challenge, but also a strategic opportunity that can improve the competitiveness and resilience of its operations and the quality of its customer service, boosting the attraction and retention of talent. In this regard, the action plans derived from this integration seek not only to minimise the negative impacts on society, but also to position the Group as a key player in promoting sustainability in the financial sector.

Caja Rural de Navarra Group identified the following impacts, risks and opportunities as material for the Group:

ESG	Description	IRO	Type	Topic	Value Chain
Social	Loss of productivity as a result of lack of employee motivation and engagement due to poor working conditions related to working hours, pay conditions, health and safety in the workplace, diversity, inclusion, etc.	Risk	Acute	S1 Talent management and working conditions of own staff	Staff
Social	Loss of service quality due to difficulties in attracting and retaining talent, as well as lack of generational replacement.	Risk	Acute	S1 Talent management and working conditions of own staff	Our team Clients
Social	Encourage employee well-being through initiatives that promote healthy habits and physical activity, avoiding the deterioration of mental health due to work-related stress and work-related injuries, by implementing ergonomics programmes.	Impact	Actual Positive	S1 Talent management and working conditions of own staff	Staff
Social	Implement recruitment policies that favour vulnerable groups, thus promoting a more inclusive and diverse community.	Impact	Actual Positive	S1 Talent management and working conditions of own staff	Staff Company
Social	Ensure the accessibility of offices for people with disabilities, in compliance with current legislation.	Opportunity	Reputational Regulatory and legal	S1 Talent management and working conditions of own staff	Our team Clients
Social	Strengthening the image of the Bank and attracting talent by fostering a working environment that promotes non-discrimination on grounds of gender, origin, race, disability, religion or sexual orientation.	Opportunity	Reputational	S1 Talent management and working conditions of own staff	Staff Company
Social	Partnerships with educational institutions for the creation of specialised training programmes.	Impact	Actual Positive	S1 Talent management and working conditions of own staff	Society
Social	Ensure respect for human rights in all economic financing activities, requiring companies to comply with established international standards.	Opportunity	Reputational Market	S2 Workers in the value chain	Investee entities Customers
Social		Impact	Potential Negative	S3 Social commitment and relationship with communities	Society
Social	Loss of productivity from poor motivation and commitment among the workforce caused by poor working conditions in respect of working hours, pay, health and safety at work, diversity, inclusion, etc.	Impact	Current Positive	S3 Social commitment and relationship with communities	Company Clients Our team

ESG	Description	IRO	Type	Topic	Value Chain
Social	Decline in quality of service due to difficulties attracting and retaining talent and a failure to bring on new generations in the workforce.	Opportunity	Reputational	S3 Social commitment and relationship with communities	Clients Company
Social	Promote employee well-being through initiatives to encourage healthy lifestyles and physical activity, prevent stress-related mental health problems and work-related accidents and run ergonomic working programmes.	Opportunity	Reputational	S3 Social commitment and relationship with communities	Company Clients
Social	Apply hiring policies that target vulnerable groups so promoting a more diverse and inclusive community.	Opportunity	Market	S4 Customer satisfaction and security	Clients
Social	Make sure branches are accessible to people with disabilities, in compliance with applicable law.	Impact	Current Positive	S4 Customer satisfaction and security	Clients Company
Social	Strengthen the Bank's image and attractiveness to talent by promoting a working environment of non-discrimination on grounds of gender, origin, race, disability, religion or sexual orientation.	Risk	Reputational Regulatory and legal	S4 Customer satisfaction and security	Clients
Social	Partnerships with educational institutions to create specialised training programmes.	Risk	Market	S4 Customer satisfaction and security	Clients
Social	Ensure human rights are respected in all financing activities by requiring that companies meet international standards.	Impact	Potential Negative	S4 Customer satisfaction and security	Clients
Social	Damage to communities and/or the environment caused by the conduct and/or financing of projects and operations.	Risk	Market Reputational	S4 Customer satisfaction and security	Clients
Social	Agreements with public sector bodies to prevent financial/insurance exclusion in certain areas where the Bank is active.	Risk	Market Reputational	S4 Customer satisfaction and security	Clients
Social	Strengthen the Bank's image through financing/investment projects for the local communities where it operates, including social volunteering.	Impact	Potential Negative	S4 Customer satisfaction and security	Clients



## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### S1-1: Policies related to own workforce

**[DP 17, 19, 20, 21, 22, 23, 24, AR10, AR11, AR12, AR14, AR15, AR16]** This section runs through the policies governing Caja Rural de Navarra Group's own force. The section "Annex II - List of corporate policies and identified IROs", details information on the policies relevant to the IROs identified in the Double Materiality process:

- **Health and safety policy:** seeks to prevent labour risks and provide a safe and healthy working environment for all employees. This includes preventative measures, safety training and a focus on health at work.
- **Remuneration policy:** seeks to establish a fair and equitable remuneration policy which recognises the performance and contribution of every employee. It also ensures compliance with labour regulations and transparent salary management.
- **Equality Plan:** seeks to promote equal opportunities and non-discrimination on grounds of gender in the workplace. This includes measure to eliminate the pay gap, promote work-life balance and prevent sexual and gender-based harassment.
- **Digital disconnection policies:** seeks to ensure the right of employees to disconnect from work outside working hours, promoting work-life balance. This includes measures to

avoid work overload and stress related to the use of digital technologies.

- **Functional Diversity Plan:** seeks to promote the integration of people with disabilities into work, guaranteeing equal opportunities and non-discrimination on access to employment, training and professional development.
- **Code of Conduct:** this establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.
- **Equality and Non-Discrimination Policy:** Seeks to ban any form of discrimination for reasons of gender, ethnic origin, incapacity, sexual orientation or any other characteristic. Policies and practices are reviewed regularly to make sure they are compliant and effective.
- **Social protection measures "CRN Social Benefits":** seeks to guarantee protection for employees in vulnerable situations such as illness, unemployment, retirement or maternity/paternity. Its target is to ensure the continuity income and access to benefits.
- **Protocol for the prevention of harassment in the workplace, sexual and gender-based harassment:** seeks to prevent and address situations of harassment in the workplace, guaranteeing a respectful and violence-free working environment.
- **Training Plan:** seeks to encourage employees' professional and personal development by offering training and upskilling programmes tailored to their needs and aspirations. Its aim is to improve the skills and employability of Caja Rural de Navarra's own workforce.

### S1-2: Processes for engaging with own workforce and workers' representatives about impacts

**[DP 25, 27]** For Caja Rural de Navarra Group, collaborating with its own employees and their representatives is fundamental to guarantee a safe, fair and transparent working environment. It recognises the importance of open and constructive dialogue to address both actual and potential incidents that may affect employees.

Caja Rural de Navarra Group, as a Credit Cooperative Society, is governed by its Governing Board, and this body includes an employee representative. In this way, the workforce participates in corporate governance decisions, and has access to the Group's management information and strategy.

He/she also sits on the Remuneration Committee, where the Bank's remuneration policy is analysed before being passed on to the Governing Board for approval.

Similarly, the way the Bank organises its human resources means the whole workforce has have a voice in their day-to-day activities. First, it promotes teamwork so that the branch office is the Company's core operational unit. Accordingly, targets set by the company are all team targets. The criteria to achieve, whether in terms of financial growth, customers or general functioning of the branch, are common goals shared by all.

The company's communications system is also based on team meetings and coordinated decision-making by managers with the participation of all those involved. All the committees and meetings feed into the branch meeting, which is the core forum for the team and requires the collaboration

of the whole group. This also applies to the areas and departments that make up the Bank's Central Services.

Relations with the workers' representation bodies are continuous, providing for consultation and participation in decisions. They are conducted via permanent structures such as the Health and Safety Committee and the Equality Plan Negotiating Committee. This is in addition to the continuous communications and feedback integrated into the normal activity of Caja Rural de Navarra Group.

As a result, multiple open and transparent communication channels are maintained so that employees and their representatives can report incidents and raise concerns (telephone lines, special e-mail addresses, suggestion boxes and regular meetings with employee representatives). In addition, framework agreements and collective bargaining agreements set out the principles and procedures to ensure respect for employees' human rights, enabling the Group to understand employees' perspectives and adapt policies and practices to their needs and expectations.

Collaboration with own employees takes place in all phases of the labour impact management cycle, from the identification and assessment of risks to the implementation of preventative and corrective measures, fostering a culture of transparency and trust, where employees feel safe to express their concerns without fear of reprisals. Workers' representatives are involved in decision-making that may affect working conditions and employee welfare, their contributions and suggestions are valued, and the aim is always to reach consensual agreements that benefit both parties.

Caja Rural de Navarra Group is committed to continually reviewing and improving the processes of collaboration with its own staff and their representatives, to ensure a safe, fair and

respectful working environment. It holds periodic job satisfaction surveys to assess the satisfaction of workers in this area, and identify measures for improvement.

In the subsidiaries, work is structured to in line with the specifics of each company and best practice in their sector.

**[DP 28]** Caja Rural de Navarra also has proactive measures in place to understand and address the perspectives of employees with disabilities:



**[DP AR24]** The importance of actively involving its employees and representatives in the transition towards greener and climate-neutral operations is also relevant for Caja Rural de Navarra Group. Continuous and transparent dialogue is the way to ensure this transition happens in a fair and equitable manner, minimising negative impacts and maximising opportunities for all.

Caja Rural de Navarra Group maintains an ongoing dialogue with its employees and representatives to ensure a fair and sustainable ecological transition. This is achieved through open and accessible communication channels, where employees can express their concerns and suggestions on sustainability initiatives. In addition, regular meetings are held with employee representatives to discuss the progress and challenges of the transition.

All opinions and suggestions are carefully recorded and analysed, with feedback reports summarising the main concerns and proposals of employees. These opinions are taken into account in decision-making related to the ecological transition, with follow-up systems in place to ensure that decisions taken reflect employees' concerns. Employees are kept informed about how their views have influenced decisions through newsletters, meetings and the intranet, encouraging transparency in communicating the progress and results of sustainability initiatives.

At the organizational level, sustainability committees have been set up to coordinate and oversee green transition initiatives, including representatives of employees, management and other stakeholders. At site and project level, employee participation in the implementation of sustainability initiatives is promoted by establishing coordination systems to centralise information and ensure actions are implemented consistently.

In addition, training and development programmes are offered to provide employees with the skills they need to adapt to changes in the labour market, promoting training in skills related to sustainability and the green economy. Care is taken to ensure the transition is done in an equitable manner, taking into account the needs and opportunities of all groups of employees and promoting equality and non-discrimination policies. Potential health and safety risks to employees arising from the green transition are assessed, with preventative measures then taken to ensure a safe and healthy working environment.

### **S1-3: Processes to remediate negative impacts and channels for own workforce to raise concerns**

**[DP 30, 32, 33, AR27, AR29, AR30, AR31, AR32]** Caja Rural de Navarra Group is committed to ensuring a safe, fair and respectful working environment for all its employees. It has therefore established robust procedures to prevent, remedy and address any incidents related to ESG issues (IROs) that may affect staff, and effective channels for employees to express their concerns and needs.

Caja Rural de Navarra Group has established a robust framework for the prevention and management of negative impacts on its staff, prioritising transparency and open communication. To this end, it implements proactive policies and procedures that include occupational risk assessments, regulatory compliance audits and awareness programmes. In addition, regular risk assessments are conducted to identify and prevent potential incidents, and training programmes are provided to promote the safety, health and well-being of employees. Collaboration with employee representatives is an

essential part of the development and review of these policies.

In the context of the ecological transition, Caja Rural de Navarra conducts a detailed analysis of possible impacts on its organizational structure and employment. Based on this analysis, contingency plans are developed to minimise adverse effects and explore new employment opportunities in sustainable sectors. This comprehensive approach ensures that the transition is carried out in a fair and equitable manner, protecting the interests of employees and promoting a sustainable future for the organization.

One of Caja Rural de Navarra Group's commitments is to address any negative impact on employees in a timely and effective manner, offering comprehensive support including psychological assistance, legal advice and appropriate compensation. To make sure these measures are effective, they are continuously assessed through satisfaction surveys and follow-up of specific cases, guaranteeing that employees' needs are adequately addressed.

In addition, clear and detailed procedures are in place for the resolution of incidents, ranging from thorough investigation of the facts to the implementation of corrective measures and transparent communication of the results to all stakeholders. The Group strives to guarantee fairness and objectivity at every stage of the process, ensuring that the rights of all employees are respected and that a fair and equitable working environment is maintained.

Caja Rural de Navarra Group has also established systems for regular dialogue and consultation with workers' representatives to address critical issues such as occupational safety, health and working conditions, thus ensuring a safe and fair working environment. This is complemented by regular

meetings with works councils and trade union delegates, where labour policies and practices are evaluated and any incidents that may arise are discussed.

To facilitate direct and confidential communication, Caja Rural has implemented direct channels which are available to all employees, regardless of their location or position, and allow employees to raise their concerns and needs with management. These channels include meetings with human resources managers, suggestion boxes and an employee hotline. The Group disseminates information about these channels via the intranet, newsletters and training sessions, ensuring that all employees are informed about how and where to express their concerns. In addition, Caja Rural de Navarra Group provides training to its employees on the use of these communication channels and their employment rights. The Group also carries out awareness campaigns to promote a culture of open communication and mutual respect, fostering an environment where employees feel safe and valued when expressing their opinions and needs.

In this regard, and in accordance with the provisions of Law 2/2023 of 20 February, Caja Rural de Navarra, Informes y Gestiones, Proenor, Spiga I&D Alimentaria, and Explotación Agrícola Las Limas, have an Ethics Channel, that can be used by employees and by third parties related to them, to report any actions or omissions that could constitute abuse. This channel, set up in Caja Rural, provides protection for whistleblowers. The Solera Asistencial sub-group and Harivenasa have developed their own Ethics Channels.

Caja Rural de Navarra Group also encourages employee participation in third-party systems, such as through works councils and as trade union delegates, to effectively represent their interests. Access is provided to both internal and external

complaints and grievance systems. A complaints and claims management system is in place, where employees can report any type of incident, ensuring that all concerns are properly addressed. Caja Rural de Navarra Group has implemented a system to record and analyse all concerns and complaints from its employees, and monitor their resolution in detail. This process includes the preparation of regular reports that identify trends and patterns in concerns, enabling the Group to spot areas for improvement in its labour policies and practices.

Caja Rural de Navarra Group is committed to fostering an open and constructive dialogue with its staff, ensuring that their concerns are addressed and resolved effectively.

## **S1-4: Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions**

**[DP 35, 38, 40, 41, 42, AR37, AR39, AR43, AR44, AR45, AR47]**

Proactive management of impacts, risks and opportunities related to its own workforce is of the utmost importance for Caja Rural de Navarra Group as a way to guarantee a sustainable and responsible working environment. Details of the measures and processes applied are as follows:

### **A. ACTION PLANS AND RESOURCES TO MANAGE MATERIAL IMPACTS, RISKS AND OPPORTUNITIES**

- **Negative Impacts :** Specific action plans have been implemented to address negative impacts such as workplace accidents, discrimination or harassment, including:
  - Occupational risk prevention and safety training programmes.
  - Equal opportunity and non-discrimination policies, with confidential complaint channels.
  - Psychological support services and legal advice for affected employees.

The effectiveness of these actions is assessed through internal audits, employee satisfaction surveys and monitoring of key performance indicators (KPIs).

- **Positive Impacts:** Initiatives have been put in place to drive positive impacts, such as career development and workplace well-being, including:

- Training and professional development programmes tailored to the needs of employees.

- Work-life balance policies and flexible working hours.

- Recognition and reward programmes for outstanding employees.

The effectiveness of these initiatives is measured through working environment surveys, performance reviews and monitoring of the employee retention rate. It should be noted that the form and depth of implementation is different in each of the Group's companies.

- **Risks and Opportunities :** Action plans have been developed to manage risks such as talent shortages or skills obsolescence, and to take advantage of opportunities such as digitization and sustainability. These include:

- Talent attraction and retention programmes, with an emphasis on diversity and inclusion.

- Training plans in new technologies, sustainable competences and skills required in each job.

- Participatory innovation projects, where employees propose ideas and solutions.

The effectiveness of these plans is assessed by monitoring KPIs related to recruitment, training and innovation.

## B. PROCESSES TO IDENTIFY NECESSARY ACTIONS

- Caja Rural de Navarra Group identifies where it needs to take action through a continuous assessment process that includes:

- Productivity data analysis of workplace incidents, complaints and employee surveys.

- Consultations with workers' representatives and human resources experts.

- Occupational risk assessments and compliance audits. Based on this analysis, specific action plans are developed and the necessary resources are allocated for their implementation

## C. MEASURES TO MITIGATE SIGNIFICANT RISKS

- To mitigate significant risks such as the loss of key talent or the impact of digitization on employment, Caja Rural de Navarra Group has implemented measures such as:

- Succession planning and leadership development.

- Training programmes in new technologies and professional retraining.

- Labour flexibility policies.

## D. MEASURES TO SEIZE IMPORTANT OPPORTUNITIES

- In order to take advantage of important opportunities such as attracting young talent or promoting sustainability, Caja Rural de Navarra Group has implemented measures such as:

- Internship and scholarship programmes for students and recent graduates.

- ICorporate volunteering projects and partnerships with social organizations.

- IPromotion of the culture of sustainability within the organization.

- IHighlighting its idiosyncrasy and working style as well as its alignment with international standards such as the UN Guiding Principles on Business and Human Rights and the Sustainable Development Goals (SDGs).

Caja Rural de Navarra Group is committed to maintaining a proactive and transparent approach in the management of the impacts, risks and opportunities related to its own staff, ensuring a sustainable and responsible working environment.

## METRICS AND TARGETS

### S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

**[DP 44, 46, 47]** Caja Rural de Navarra Group is committed to continuous improvement in the management of its own staff, establishing clear and measurable goals to reduce negative impacts, boost positive impacts and manage relevant risks and opportunities.

### ENVIRONMENTAL GOALS

- Sustainable resource management to reduce paper and water consumption.

- Increase the number of green finance projects, develop sustainable financial products and train employees in green finance.

- Implement best practices in the processes of the parent company and its subsidiaries to gradually reduce the carbon footprint.

### SOCIAL GOALS

- Increase the representation of women in leadership positions.

- Reduce the rate of occupational accidents, strengthening occupational risk prevention programmes and promoting a culture of safety (See Annex 7).

- Increase employee volunteer hours in social projects by promoting volunteer programmes and partnerships with social organizations.

### GOVERNANCE GOALS

- Conduct regular ethics and compliance training and strengthen whistleblowing channels.

- Conduct regular risk assessments and develop mitigation plans.

- Increase employee participation in decision-making on sustainability issues by establishing sustainability committees with employee participation, and conducting regular consultations.

### CROSS-CUTTING GOALS

- In the parent company, increase customer and employee satisfaction by 10% by 2026, conduct satisfaction surveys and establish continuous dialogue channels.

- Encourage open innovation, and collaborate with, or even instigate, start-ups and research centres.

- Increase the dissemination of sustainability information through digital channels by publishing sustainability reports on the web.

## S1-6: Characteristics of the Bank's employees

**[DP 48, 50, AR55, AR56, AR58, AR59]** At Caja Rural de Navarra the people who make up the team are its biggest asset and the foundation stone on which the Group is built.

The corporate culture and the values we bring to work every day reflect this focus on people, their well-being, and the Group's general determination to stand with our people, "always close".

We are people who share our lives with others, whether in urban or rural settings, and try to do our bit to make sure the community develops alongside us. Caja Rural de Navarra Group believes in a diverse range of people, paying special attention to generational diversity in an egalitarian workspace. Everyone on the payroll has their own distinguishing set of talents and characteristics. This diverse mix of people must be understood and respected by all of us, being a way to enhance the value of the whole collective, bringing complementary talents to the table and cultivating the very skills that make us different. In this way, the diversity of our people ultimately makes us all stronger.

A diverse workforce is also a way to understand and reflect modern society. Everyone learns, works, develops and progresses together.

In Caja Rural de Navarra Group, all employees are salaried employees, with a direct labour relationship with the Group through an employment contract in accordance with

current Spanish labour legislation. They receive fixed and regular remuneration, which may be supplemented by variable components such as incentives or bonuses. They form part of a hierarchical organizational structure, working under the management and supervision of the company.

Employees represent a key strategic asset to the success of the organization, and their qualities reflect the corporate values of excellence, commitment, diversity and innovation.

In the investee companies, the intention is to adopt similar standardised policies which are adapted to the particularities of each sector. The types of work and qualifications are highly diverse and companies, immersed in their own work dynamics, need to strike their own balance while maintaining their competitiveness.

Caja Rural de Navarra Group stands out for the diversity of its workforce in terms of gender, age and geographical origin, elements that enrich its corporate culture and strengthen decision-making by providing multiple perspectives. In terms of gender, the Group actively promotes equal opportunities, ensuring that both men and women have equal access to professional development and leadership roles. With respect to age, the Group values the mix of young and experienced employees, harnessing the energy and digital skills of the former, together with the experience of the latter, and fostering intergenerational working. Finally, the geographic diversity of its staff, given its presence in several regions, allows the Group to better understand and serve the specific needs of its customers in each operational area.

Caja Rural de Navarra Group's own workforce is classified according to Spanish labour legislation as follows:

- **Permanent contract:** employment relationship with no end date, predominantly for permanent staff.
- **Temporary contract:** linked to projects or vacancies, with a defined duration.
- **Training Contract:** for young graduates seeking professional experience.

To ensure accuracy and transparency in the management of its employee information, Caja Rural de Navarra Group has set up a structured and centralised data collection system in its internal human resources management platform. This system records in detail the relevant information on its employees, both in terms of number of people and full-time equivalents (FTE). The reliability of the data is ensured by applying standard financial sector criteria and adapting the methodologies to current Spanish regulations. This involves the use of data from employment contracts, both permanent and temporary, and the recording of hours worked, which are essential elements for calculating FTE.

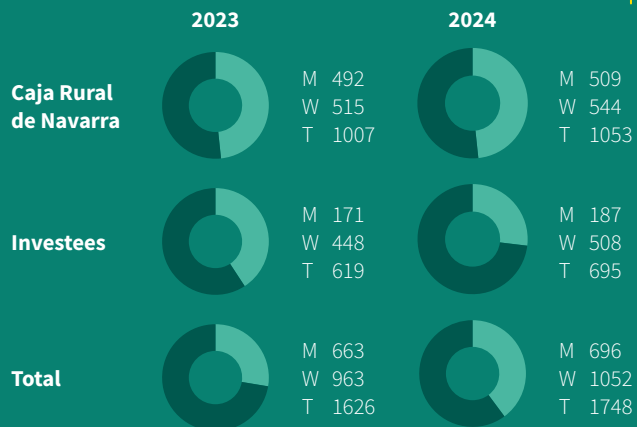
In order to standardise the representation of working time and to allow equal comparisons between part-time and full-time employees, the concept of Full Time Equivalent (FTE) is used. The FTE is calculated by reference to the standard working hours in the applicable collective labour agreements. In the case of part-time employees, their hours worked are adjusted proportionally to the full working day. The specific calculation consists of dividing the total hours worked by each employee during the reference period by the hours corresponding to a full working day, thus ensuring

uniform accounting for all employees, regardless of the form of their contract.

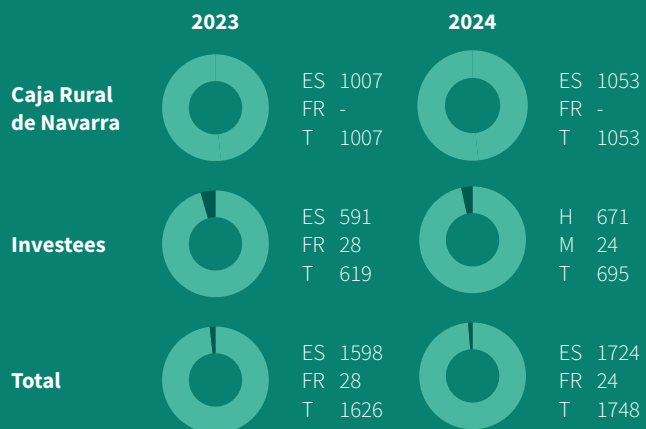
In Caja Rural de Navarra Group, the information disclosed focuses almost exclusively on the Spain, as the Group has no significant presence elsewhere, and the data provided reflects the operational and employment reality within Spain. To ensure a standardised analysis of workforces at all companies, the Group reports data using the professional categories applied by Caja Rural de Navarra. Accordingly, the Bank itself reports data classified by its own categories and the data from each investee, which use their own internal classifications, is adjusted to fit the categories reported in this document.

The following tables show the breakdown of the group's total number of employees at year-end by gender and by country:

## GENDER BREAKDOWN



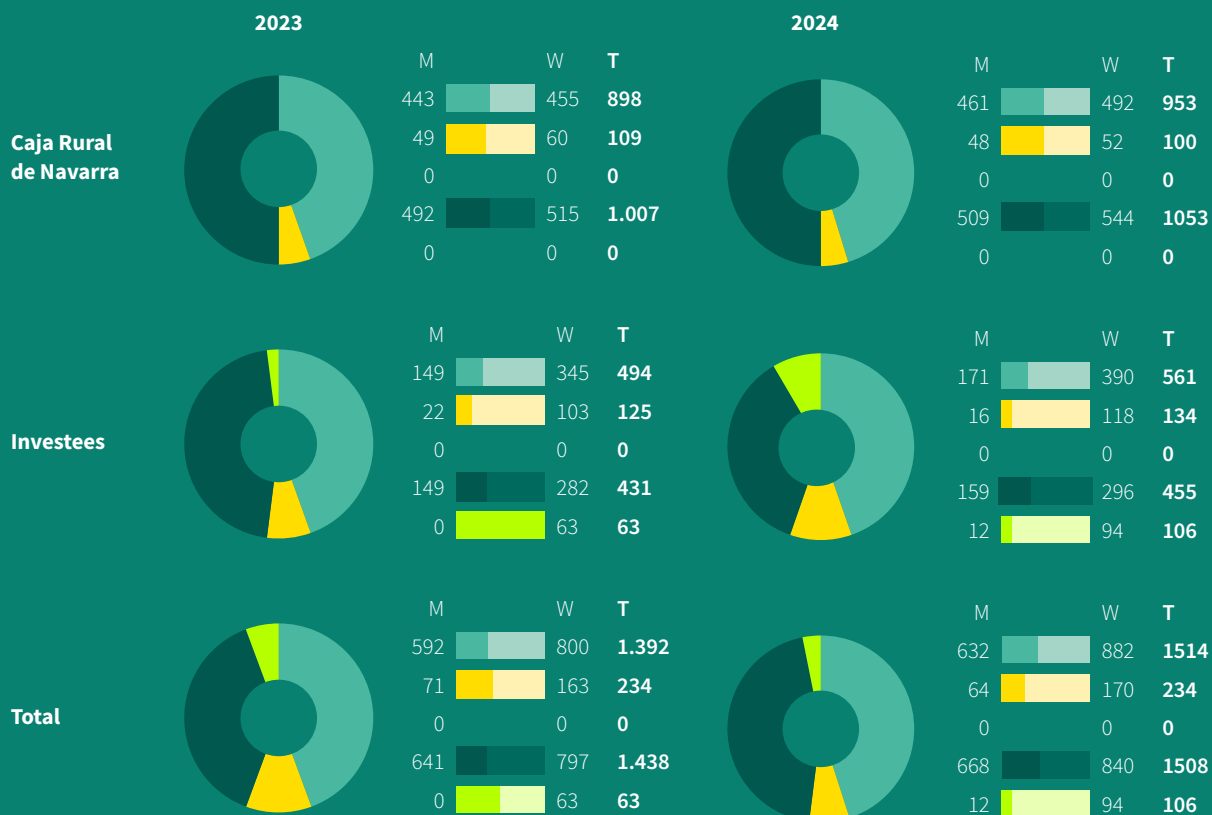
## COUNTRY BREAKDOWN



## TYPES OF CONTRACT BY GENDER



- Nº of permanent employees
- Nº of temporary employees
- Nº of workers on non-guaranteed hours
- Nº of full-time employees
- Nº of part-time employees





Caja Rural de Navarra Group operates mainly in: Álava, Gipuzkoa, Vizcaya, Navarra, La Rioja and Madrid.

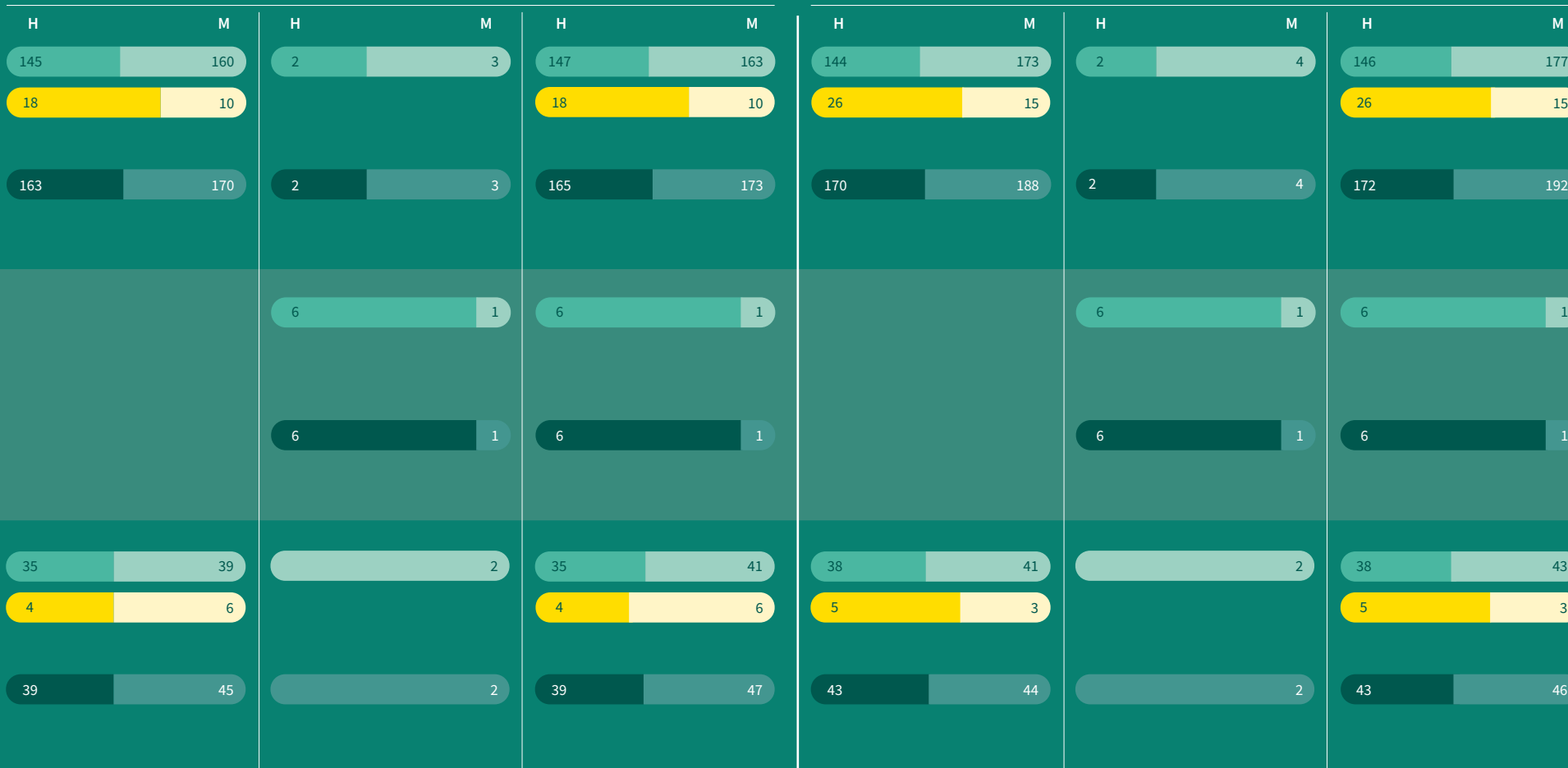
Below is a detailed breakdown illustrating the distribution of the Group's employees, classified by type of contract, type of working day (full or part-time) and region where they work:

- N° of permanent employees
- N° of temporary employees
- N° of workers on non-guaranteed hours
- N° of full-time employees
- N° of part-time employees

## 2023

## 2024

### Euskadi



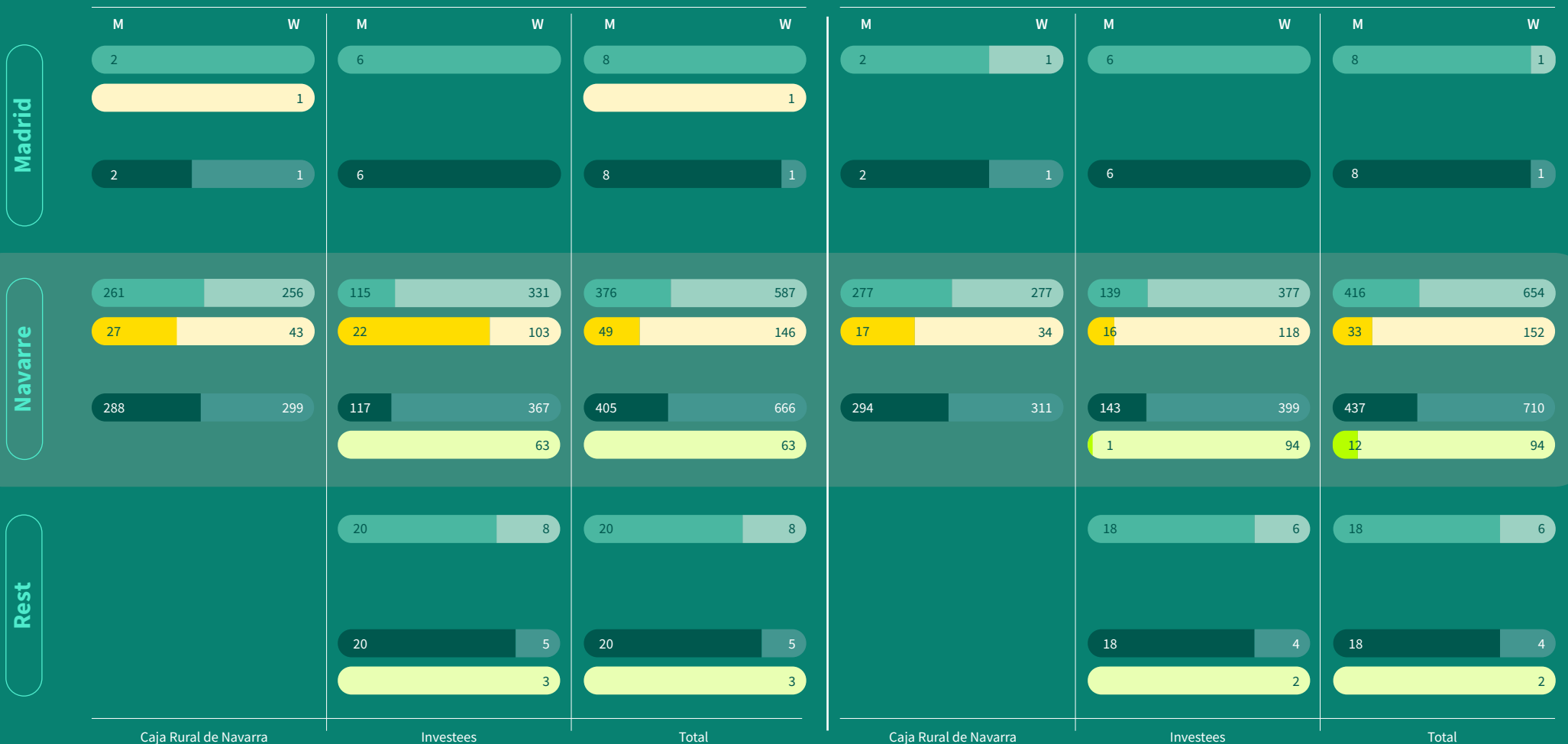
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Below is a detailed breakdown illustrating the distribution of the Group's employees, classified by type of contract, type of working day (full or part-time) and region where they work:

- N° of permanent employees
- N° of temporary employees
- N° of workers on non-guaranteed hours
- N° of full-time employees
- N° of part-time employees

2023

2024



The Bank calculates its staff turnover ratio by considering various factors. This ratio covers voluntary departures of employees, either by personal decision or in search of new career opportunities, as well as departures due to dismissal, which may be due to disciplinary reasons or internal restructuring. In addition, retirements and, in exceptional cases, deaths in service are included. The inclusion of all these categories provides a comprehensive turnover ratio, reflecting not only voluntary departures but also other forms of separations affecting the staff structure.

## S1-7: Characteristics of non-employees in the undertaking's own workforce

Caja Rural de Navarra Group, in its commitment to transparency and clarity in the presentation of its employment structure, reports that the majority of its own staff are salaried workers. However, INTONA and Harivenasa have had a total of 15 non-salaried workers throughout the year, belonging to temporary employment agencies, at different times of production needs, which represents 0.85% of all the Group's employees (salaried and non-salaried) in 2024. In 2023, 11 non-salaried employees were also employed throughout the year, representing 0.67% of all the Group's employees.

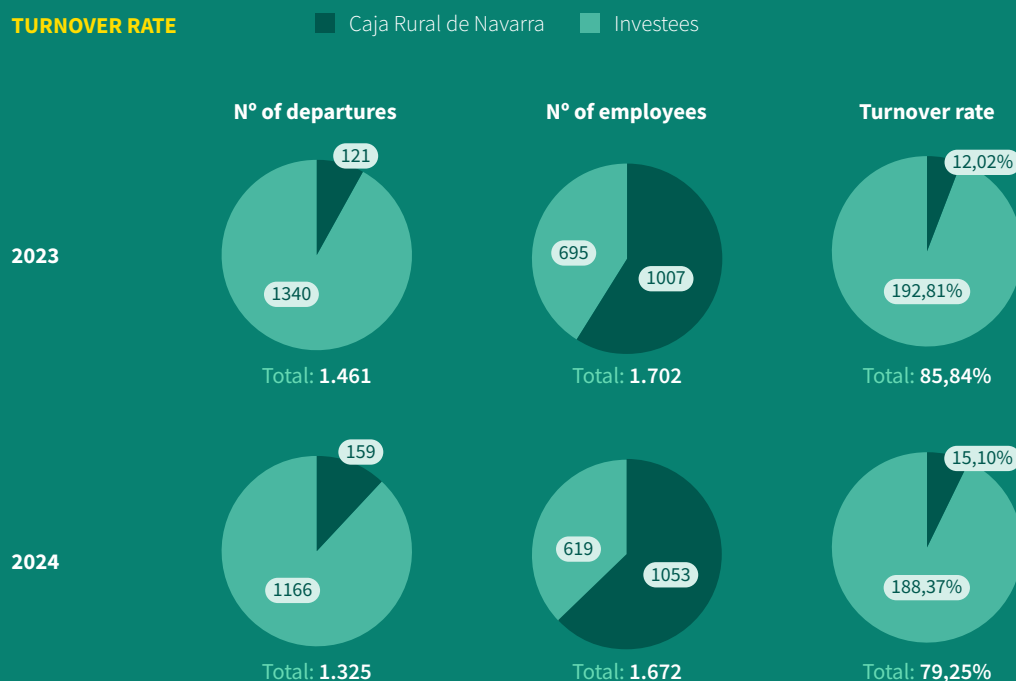
This policy responds to the firm conviction of Caja Rural de Navarra Group to promote stable and lasting labour relations, based on the protection of the labour rights and social security of its employees. It guarantees compliance with current labour regulations, including applicable collective bargaining agreements, and promotes a fair and safe working environment for all its employees.

Consequently, all the benefits, rights and responsibilities inherent in the employment relationship are applied uniformly to all Caja Rural de Navarra Group's own staff, ensuring equal treatment and fair access to opportunities for professional and personal development.

## S1-8: Collective bargaining coverage and social dialogue

**[DP 58, 60a, AR66, AR67, AR68]** Rural de Navarra Group recognises the importance of social dialogue and collective bargaining as fundamental tools to guarantee fair and equitable working conditions for employees. Information is provided below on the degree of influence of collective bargaining agreements on working and employment conditions, and on employee representation in social dialogue, at the level of the Group and European level.

### TURNOVER RATE



The turnover rate is calculated by dividing the number of departures by the number of employees at the end of the year, and multiplying by 100. This is due to the nature of these companies, where there is a high volume of entry and exit of personnel. In particular, in the senior care sector, the hiring of temporary care staff generates a high turnover during the year.

## COLLECTIVE BARGAINING AGREEMENTS

- As far as collective bargaining is concerned, the Bank is covered by the sector agreement for credit co-operative societies, which is negotiated on the employers' side by the Unión Nacional de Cooperativas de Crédito UNACC, of which the Bank is a member, and by ASEMECC, and on the employees' side by the trade unions Comisiones Obreras (CC.OO.), Unión General de Trabajadores (UGT) and Federación Fuerza Independencia y Empleo (FINE). This is the basic regulation governing activity in the credit cooperatives and therefore directly applicable to 100% of Caja Rural de Navarra employees. For the rest of the subsidiary companies their working and employment conditions are regulated by their respective sector agreements, which are automatically applied to all workers within their scope of application.
- However, in addition to the above negotiation and application of the collective sector agreement, there are other areas which are regulated by internal agreements between employees' legal representatives and management, addressing specific issues that improve on the terms in the collective agreement or regulate matters not covered by the general regulations.
- Current agreements in force cover, first, distribution of working hours in light of work-life balance and employees' right to decide some of their working hours, so that work is done at the best time for the business and staff and coordinated with the working team. It also covers extra holidays. Second, social benefits such as loans for various purposes, inclusion of products via flexible remuneration, insurance in various circumstances and support for families with children, etc. All of these benefits are summarised in a file distributed internally to all staff.

## EMPLOYEE REPRESENTATION IN SOCIAL DIALOGUE

- The employees of Caja Rural de Navarra Group are represented in the social dialogue through the workers' legal representative bodies, such as the works councils and trade union delegates.
  - These bodies are actively involved in the negotiation of collective bargaining agreements, as well as in the development of labour policies and practices affecting employees.
  - At the European level, the Group's employees are also represented through the social dialogue systems established by the European Union, such as the European Works Councils.
  - A constant and constructive dialogue is maintained with employee representatives, with the aim of ensuring a fair, safe and respectful working environment.
- ### COMMITMENT TO SOCIAL DIALOGUE
- Caja Rural de Navarra Group is committed to maintaining and strengthening social dialogue with employees, recognising their fundamental role in building solid and lasting labour relations.
  - For the Group, social dialogue is essential to promote equal opportunities, social justice and sustainable development.
  - We will continue to work in partnership with employee representatives to ensure that the Group's labour policies and practices meet the highest standards of quality and fairness.
- Data on the coverage of collective bargaining and social dialogue are shown below:

Collective bargaining and social dialogue coverage	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
% of employees covered by collective bargaining	100%	100%	100%	100%	100%	100%
% of employees represented by social dialogue	100%	88%	93,99%	100%	85%	93,28%

In the Spanish context, the automatic application of sector and company agreements to all workers within their scope, irrespective of their trade union membership or participation in representative bodies, ensures very wide collective bargaining coverage.

## SI-9: Diversity metrics

At Caja Rural de Navarra Group we have an Equality Plan negotiated with workers' legal representatives and registered in 2023.

The plan includes a series of measures that embody our commitment to develop policies for equal opportunities and treatment of men and women. As a company, we foster a culture of equality in the workforce that we also apply in our relationship with other external stakeholders.

We would emphasise that the workforce at Caja Rural de Navarra Group is equally balanced in terms of gender and that 36.32% of branch managers, the key management post in the Group, are women, one of the highest proportions in the sector.

Caja Rural de Navarra Group, as a sign of its commitment to inclusion and equal opportunities, is a signatory of the Diversity Charter, an initiative promoted by Fundación Diversidad, with the support of the European Commission and the

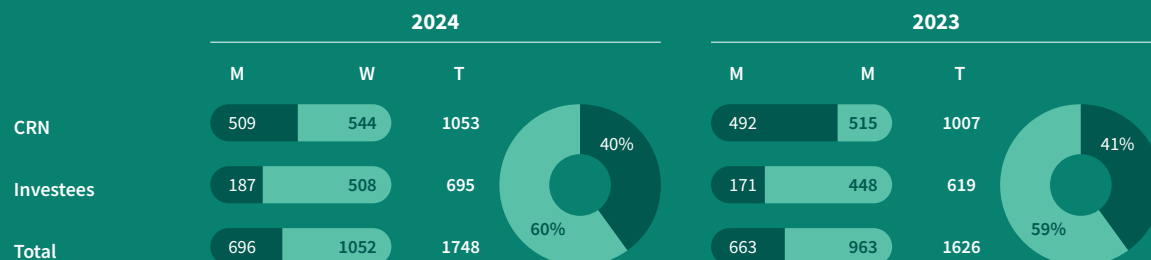
national Charters of each of the countries of the European Union.

With regard to gender in senior management, in the Caja Rural Group, senior management is considered to be that identified as such in the parent company, plus the general managers of the subsidiaries who enjoy autonomy of management, as follows:

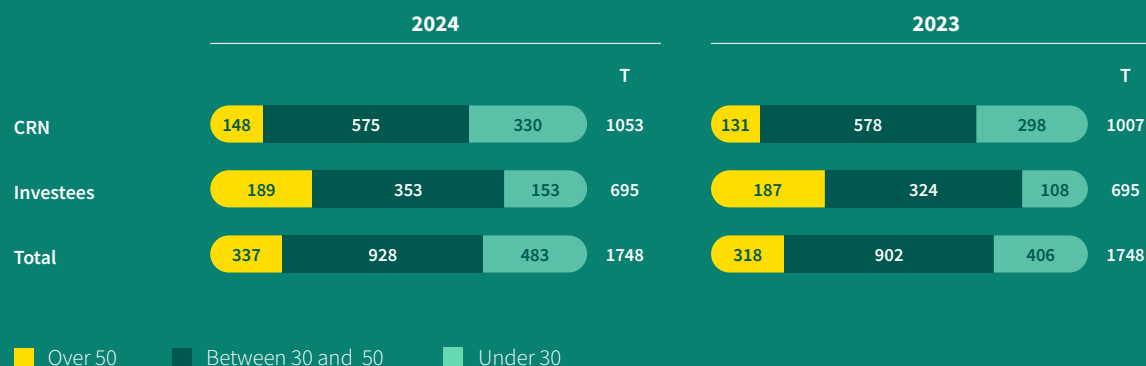
	2024	2023
Men	13	13
Women	0	0
Total	13	13
% Men	100	100
% Women	0	0

**[DP 64, 66]** The following tables break down the number of employees by gender and age range as of 31 December each year:

### GENDER BREAKDOWN



### BREAKDOWN BY AGE



## S1-10: Adequate wages

**[DP 67, 69, AR72, AR73a]** Caja Rural de Navarra structures its remuneration system to achieve an internal coherence between the elements of remuneration and the posts and responsibilities being rewarded, and gender equality, which is tailored to the realities of the market and provides a path of professional progress and promotion for its staff.

Caja Rural de Navarra Group has approved its Remuneration Policy linked to Risk management which is designed to fulfil its stated obligations. The Policy is based on a number of principles, including the following:

- Individual fixed remuneration shall fairly reflect each employee's responsibility and professional career. It must be reviewed regularly (at least annually) and changed where appropriate.
- Variable remuneration shall take account of employees' performance, results achieved by their team and results achieved by the Group as a whole.

All salary information refers to the Average Labour Index of Caja Rural de Navarra Group.

Caja Rural de Navarra Group's remuneration structure has a direct influence on corporate culture, promoting a working environment where effort, collaboration and commitment to business goals are recognised and rewarded through equality and transparency. It is crucial to highlight that 100% of Caja Rural de Navarra Group staff receive remuneration that rigorously complies with current labour legislation, ensuring that all employees, without exception, receive adequate salaries in accordance with collective bargaining agreements and Spanish regulations.

Caja Rural de Navarra Group ensures that the minimum wage offered to its staff is in line with their respective collective bargaining agreements. In compliance with the



requirements of the CSRD, Caja Rural de Navarra Group certifies that the salaries of its employees in 2023 and 2024 are in line with the principles of equity and sustainability. The minimum wage paid in 2024 and 2023 in the Group was equal to Spain's minimum interprofessional wage.

True to its values of professional development and equal opportunities, Caja Rural de Navarra Group regulates fixed salaries without gender discrimination. The remuneration system is gender neutral, with a basic salary ratio of 1:1 between men and women in the same category. Variable remuneration schemes recognise performance objectively and are easily auditable, eliminating any gender discrimination.

The annexes to this report include the wage data tables required by Law 11/2018, broken down by category, training, type of contract, etc..

## S1-11: Social protection

Caja Rural de Navarra Group is committed to guaranteeing the security and well-being of its salaried staff, offering comprehensive social protection against loss of income resulting from significant life events. As Caja Rural de Navarra Group operates exclusively in Spain, all our salaried employees enjoy the social protections established by Spanish law and the Group therefore has full social protection coverage.

Caja Rural de Navarra Group guarantees that its employees are entitled to financial benefits for temporary incapacity in the event of common or professional illness. This measure ensures their continuity of income while on sick leave. In addition, the Group provides access to occupational risk prevention services and health promotion programmes, emphasising the importance of the physical and mental well-being of its staff.

In situations of involuntary unemployment, employees of Caja Rural de Navarra Group are protected by the right to receive unemployment benefits, in accordance with current Spanish legislation. The Group's employees are also entitled to receive contributory retirement pensions, guaranteeing financial protection during their retirement. To complement this protection, the Group also offers additional pension plans, designed to enhance coverage and ensure a more comfortable retirement.

The Group guarantees the provision of maternity and paternity leave, as stipulated by Spanish legislation, allowing employees to balance their work and family responsibilities. In addition, additional leave and flexible working hours are offered to facilitate childcare, recognising the importance of family life.

Caja Rural de Navarra Group also provides special leave for employees undergoing difficult life circumstances, such as caring for dependent family members, accidents at work and other contingencies, as well as psychological support programmes and social counselling for situations of special vulnerability, reaffirming its commitment to the overall well-being of its employees.

Caja Rural de Navarra considers the social protection of its employees to be a fundamental pillar of its corporate social responsibility, committing itself to maintaining and continually improving policies and practices in the field of social protection, ensuring the welfare and safety of employees.

As part of the Caja Rural de Navarra Equality Plan signed in 2023, there is a Protocol for the Prevention of harassment in the workplace or sexual and gender-based harassment, which reflects the Group's firm commitment to "zero tolerance" of any type of discrimination.

Management will ensure the working environment remains healthy and safe for all employees and that no-one experiences any harassment of any kind, whether sexual-, professional-, personal- or gender-based.

They will also act to prevent any behaviour creating an intimidating, hostile, humiliating or offensive environment within the work teams.

The protocol applies to all staff and all people providing services to the Bank.

The following table shows the data on proceedings initiated after complaints of discrimination, as reported in each company:

Data on proceedings initiated for discrimination complaints	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
% de asalariados cubiertos por negociación colectiva	1	0	1	1	0	1

Likewise, Caja Rural de Navarra Group is opposed to any form of employment discrimination that violates the fundamental rights of its employees.



## S1-12: Percentage of employees with disabilities

line with its commitment to inclusion, equity and corporate social responsibility, recognising that a diverse workforce, which integrates people with different abilities, enriches the working environment, fosters innovation and strengthens its social sustainability.

Through specific policies and programmes, Caja Rural de Navarra Group actively promotes the integration of people with functional diversity in the workplace, facilitating their access to employment, professional development and participation in business activities, thus consolidating an inclusive organizational culture, which is respectful of and

enriched by diversity, and which brings added value and innovative perspectives to the Group.

## S1-13: Training and skills development

By encouraging the development of everyone working at Caja Rural de Navarra Group we create opportunities and help people to grow. This is the core purpose of training. The Bank believes in professional development, with financial investment playing a key role but also the time that staff put in to train themselves and others, enabling them to have a career that allows them to take on greater responsibility and fulfil different roles.

The Group fosters an atmosphere of continuous learning, with close attention to the generational diversity of the workforce. Collaboration is a learning process for both sides, about advice and business focus on one side and about digitization of the business and innovations in customer relationships on the other. Everyone contributes and helps us learn, reflecting our values of proximity, commitment and responsibility.

For this reason, Caja Rural de Navarra Group invests substantially in the training of its employees, recognising it as a fundamental pillar for individual development and organizational excellence. The Group is especially committed to the training of people who join Caja Rural through the internship programmes with Universities that it signs up to each year, or through the “Experience Programme”, dedicating time and investing resources to help them develop and receive financial education which will be of great use to them in the future.

Every year, Caja Rural de Navarra Group draws up a training plan of the actions that will be run during the year with the aim of evolving as an organization in terms of personal and professional growth, matching the needs of the workforce with the Group’s need to adapt to market situations or regulatory changes by providing the right training for each group.

Professional development is based on a combination of personal habits (commitment, effort, responsibility, etc.) and the development of the skills that professional activity demands. When both are working together the result is work satisfaction and better productivity.

Key training actions this year focused on people’s professional development, sales skills, professional advisory qualifications, and preventative actions on cybersecurity, as well as regulatory training on Insurance, anti-money laundering, compliance and data protection among other issues. We also have our own Virtual Classroom with a wide range of e-learning programmes that are open to the whole workforce.

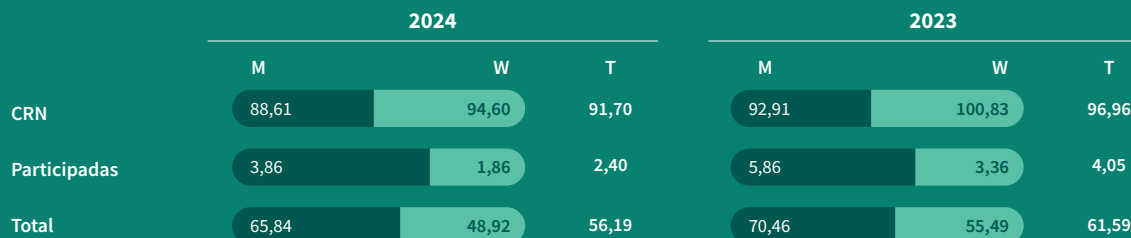
Last year 2024:

- A total of 96,563.50 training hours were delivered.
- An average of just over 91.70 hours of training per person was delivered, and employees were continuously updated.
- 91.92% of the training hours in 2024 were online, favouring work-life balance and greater sustainability by reducing the amount of work travel.

### % OF EMPLOYEES WITH DISABILITIES BY GENDER



### AVERAGE HOURS OF TRAINING BY GENDER



\*% over the total

Hours of training by professional category	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
Group I	0	N/D	4	N/D	N/D	N/D
Group II Grade 1	93	N/D	89	N/D	N/D	N/D
Group II Grade 2	216	N/D	216	N/D	N/D	N/D
Group II Grade 3	0	N/D	78	N/D	N/D	N/D
Group II Grade 4	779,5	N/D	701,5	N/D	N/D	N/D
Group II Grade 5	1.053	N/D	1.053	N/D	N/D	N/D
Group II Grade 6	18.631,50	N/D	18.631,50	N/D	N/D	N/D
Group II Grade 7	20.317	N/D	20.317	N/D	N/D	N/D
Group II Grade 8	5.996	N/D	5.996	N/D	N/D	N/D
Group II Grade 9	8.006,50	N/D	8.006,50	N/D	N/D	N/D
Group II Grade 10	11.297,50	N/D	11.297,50	N/D	N/D	N/D
Group Grade Access to the Profession	30173,5	N/D	30173,5	N/D	N/D	N/D
Group III Assistants	0	N/D	0	N/D	N/D	N/D
No Information	-	N/D	-	N/D	N/D	N/D
<b>Total</b>	<b>96.563,50</b>	<b>N/D</b>	<b>96.563,50</b>	<b>N/D</b>	<b>N/D</b>	<b>N/D</b>

Training reported by the investees is summarised in this table:

#### Hours of training

2024	Total number of attendees: 59			2023	Total number of attendees: 94		
	M	W	T		M	W	T
	721 h	944 h	16665 h		1002 h	1506 h	2508 h

The commitment to employment begins at University. Caja Rural de Navarra looks at the training environment, the pool of talent available to the Bank, and in the spirit of proximity that is our hallmark, we take part in various activities to ease people into the world of work.

Caja Rural de Navarra Group is present at events held in our community, to try to stay close to young talent and communicate our project and professional offering. This year we attended the following events:

- **Navarra:** University of Navarra and Public University of Navarra Employment Forums
- **Gipuzkoa:** Employment Forum of the University of the Basque Country and the Gipuzkoa Chamber of Commerce. Participation in the Professional Opportunities Conference.

- **Vizcaya:** Employment Forum of the University of Deusto, the University of the Basque Country and the Chamber of Commerce. We also participated in Gazte Ekonomistak, organised by the Association of Economists and the University of the Basque Country.

- **Álava:** We attended Empleogune, organised by the Vitoria City Council and the University of the Basque Country.

The Group's internship programmes are also an example of the commitment to introducing people to working life and building up young talent in our community. They give an opportunity to put acquired knowledge into practice and to develop skills linked to the business. For the Group, these programmes are the main channel for recruiting talent. The various work experience programmes welcomed 234 students through the following educational centres:

- Public University of Navarra.
- University of Navarra
- University of La Rioja
- International University of La Rioja
- University of the Basque Country
- University of Deusto
- University of Mondragón
- University of Zaragoza
- University of Cantabria
- University of León
- University of Valladolid
- Francisco De Vitoria University
- Juan Carlos I University
- MEDAC
- Lecároz Institute

Each year, we ask for feedback on the lived experience of this group. This anonymous survey also enables a cross-cutting analysis of factors related to the Group's image as an employer.

In Caja Rural de Navarra Group, the professional development of its own workforce is based on a system of annual performance reviews, applied universally to the entire team. This process is a fundamental pillar of the business and includes follow-up meetings between reviewers and those being reviewed, where they can discuss improvement actions, plans for the following year and progress with the current plan. Follow-up reviews are also held for temporary employees and induction programmes for new permanent hires, thus ensuring comprehensive coverage of the Group's performance.

#### NO. OF REVIEWS BY GENDER



##### 2024

	M	W	T
CRN	495 97,25%	513 94,30%	1008 95,73%
Part.	71 39,97%	116 22,83%	187 26,91%
Tot.	566 81,32%	629 59,79%	1195 68,36%

##### 2023

	M	W	T
CRN	416 93,70%	475 92,23%	936 92,95%
Part.	58 33,92%	98 21,88%	156 25,20%
Tot.	519 78,28%	573 59,50%	1092 67,16%

Number of reviews by professional category	Caja Rural de Navarra	
	2024	2023
Group I	0	0
Group II Grade 1	0	2
Group II Grade 2	1	4
Group II Grade 3	0	0
Group II Grade 4	8	7
Group II Grade 5	14	12
Group II Grade 6	263	256
Group II Grade 7	308	292
Group II Grade 8	94	81
Group II Grade 9	97	101
Group II Grade 10	100	131
Group Grade Access to the Profession	60	2
Group III Assistants	0	2
No Information	63	46
<b>Total</b>	<b>945</b>	<b>890</b>

Number of reviews by professional category	Caja Rural de Navarra	
	2024	2023
General and area directors	28	28
Graduates (depending on an area director)	11	13
Administrative and workshop managers (nurses, nutritionists, etc.)	148	115
Front-line staff (clerical, head cook, etc.)	0	0
Grade two staff (auxiliary nurses, cooks, assistants, etc.)	0	0
Grade three staff (administrative assistants, orderlies, etc.)	0	0
<b>Total</b>	<b>187</b>	<b>156</b>

Number of reviews carried out vs. number agreed by management	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
% Total	100%	100%	100%	100%	100%	100%

## S1-14: Health and safety

Caja Rural de Navarra maintains its aim to remain competitive with the leaders in its sector and understands that, in order to achieve this, it must continue to make organizational efforts on all fronts of good business practice.

To compete successfully demands a continuous drive for excellence in quality and productivity, as well as in prevention. All three have to go hand in hand to get the job done right.

**[DP 86, 88a]** The Management of Caja Rural de Navarra Group has embraced this culture and, to put it into practice, proposes to implement and consolidate an integrated management system

for the prevention of workplace risks whose fundamental goal is to promote the occupational health of all the staff of Caja Rural de Navarra Group. On this point, 100% of the workers are covered by social protection. The new system should eliminate or reduce accidents at work, occupational diseases and work-related ill health.

Achieving this goal is an essential challenge for management and requires the leadership of all managers. They must apply health and safety measures with the same energy, responsibility and consistency as the other functions and goals entrusted to them. The same level of responsibility is expected of all the company's employees and their trade union representatives, not only to comply with the system's guidelines and

procedures, but also and above all, to participate by coming up with possible improvements so workplaces can be made safer every day.

Caja Rural de Navarra Group uses a standardised method to calculate the rate of work-related injuries in order to ensure the accuracy and comparability of the data both within the Group and with respect to other companies. This involves dividing the number of cases of work-related injuries reported during a given period by the total number of hours worked by its own workforce. This result is then multiplied by 1,000,000, giving the injury rate per million hours worked.

**[DP AR95]** During 2024, the Caja Rural de Navarra Group recorded no cases of occupational diseases, nor have there been any work-related fatalities within the Group.

To comply with applicable Regulations on the prevention of work-related risks and to guarantee the health and safety of its employees, Caja Rural de Navarra has an In-house Prevention Service which works on prevention and embraces the specialist areas of Safety, Ergonomics and Applied Psychosociology. Industrial Hygiene and health monitoring are coordinated with the external prevention consultants Vitaly. It also has an Occupational Health and Safety Committee, representing all workers, which meets quarterly to deal with occupational risk prevention activities.

The system for management and prevention of work-related risks is based on the Prevention of Work-related Risks Plan as regards procedures and associated record-keeping. The purpose of the system is to ensure compliance with Caja Rural de Navarra's health and safety policy incorporating preventative actions in all aspects of management and at all levels of the Group.

The key elements are as follows:

1. Organization of prevention within the Group.
2. Risk assessment of workplaces, equipment and workstations.
3. Prevention planning and programming of preventive activity.
4. Studies and measurements.
5. Training and information for workers.
6. Emergency and evacuation plans.
7. Documentation of work equipment and installations.
8. Health and Safety Committee.
9. Health monitoring.

In order to achieve the annual planning goals in the Prevention Plan, the following actions were carried out in 2024:

- Monitoring of the Prevention Plan.
- Planning for health monitoring.

Accidents at work	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
No. of accidents	10	87	97	8	88	96
Accident rate	5,58	90,05	35,32	4,11	115,67	38,97
Work-related fatalities	0	0	0	0	0	0
Work-related ill health	0	0	0	0	0	0
Days lost due to accidents at work	36	3.457	3.493	54	1.613	1.667

- Prevention audits in offices and follow-up preventative actions.
- Regular maintenance of workplace emergency equipment and measures, and of workplace facilities, equipment and workstations.

The tables on absenteeism and accident rates required by Law 11/2018 are included in the annexes.

### S1-15: Work-life balance

In Caja Rural de Navarra Group, we recognise that work-life balance is fundamental for the well-being of our employees and hence for the sustainability of the Group. We promote a working environment that encourages work-life balance, offering policies and benefits that enable all employees to manage their professional and personal responsibilities effectively. The work-life balance measures are as follows:

- Digital disconnection policies
- Flexible working
- Paid and unpaid leave and sabbaticals
- Maternity leave
- Shorter day for care of children and relatives
- Medical support
- Voluntary leave and leave for care of children under 3
- Option to choose days for evening work
- Parental leave

The right to digital disconnection is a labour law that seeks to adapt the workforce to the new realities of the digital age while ensuring respect for the rights to rest time, leave and holidays, outside legal working hours, and for the personal and family life of workers, creating a healthy work/life balance, goldplating statutory requirements in this area.

The measure also helps prevent risks at work, by reducing mental overload that can result in inattention at work. Hyperconnectivity and a constant attention to and preoccupation with work can cause stress and anxiety. Better time management leads to greater employee motivation and better results in terms of productivity and performance.

Accordingly, in line with the regulations in Article 20a of the Labour Code, Caja Rural de Navarra and employees' representatives signed an agreement recognising that workers have the right to digital disconnection to make sure that, outside legal or negotiated working hours, their free time, leave and holidays and their personal and family life are respected.

Article 69.1 of the Collective Bargaining Agreement for Credit Cooperative societies, applicable to employees of Caja Rural de Navarra with an indefinite contract, sets out the agreements regarding the right to disconnect digitally and from work.

### SOCIAL BENEFITS

In terms of the benefits in financial products available:

- Subsidised loans:
  - Employee primary home loan (personal guarantee or mortgage)
  - Home loan under collective agreement (personal guarantee or mortgage)
  - Employee payments (personal guarantee)
  - Loans for other purposes (personal guarantee or mortgage)
  - Second home loans (personal guarantee or mortgage)
  - Guarantees
  - Loans

- Subsidised interest-bearing current/savings accounts.
- Subsidised cards and Via-T cards.
- Special conditions for international transactions.
- Free transfers from Ruralvía and ATMs.
- Securities: special conditions for employees, spouses and minor children.
- Car, home and life insurance with special rates for employees.

In addition to other benefits, such as:

- Help with children's studies
- Help with employee's studies
- Family support for children
- Food support for evening work
- Salary advances
- Additional orphan's pension for children of employees who died while on the payroll
- Life and casualty insurance for employees
- Right to receive 100% of real salary for a period of 18 months of temporary disability
- Training in emotional well-being support
- Flexible payment, tax breaks for employees with young children and medical insurance.

Permanent employees of Caja Rural de Navarra's equity investments also enjoy preferential conditions for all Caja Rural de Navarra products and services.

Likewise, all the salaried staff of Caja Rural de Navarra Group are entitled to take leave for family reasons, including maternity, paternity, parental care and care for dependents:

Employee data on family leave	2024				2023			
	Caja Rural de Navarra				Participadas			
	Nº	%	Nº	%	Nº	%	Nº	%
Men	23	4,51%	N/D	N/D	33	6,71%	N/D	N/D
Women	26	4,78%	N/D	N/D	20	3,88%	N/D	N/D
Total	49	4,65%	N/D	N/D	53	5,26%	N/D	N/D



The Group's investee companies do not have information on the number of eligible employees who took family leave. However, in 2024, a total of 13,511 hours were taken for family leave in the investees (446 hours for men and 13,065 hours for women). Similarly, in 2023, 7,945 hours were taken for family leave (594 hours for men and 7,351 hours for women).

## S1-16: Remuneration metrics (pay gap and total remuneration)

The core aim of remuneration policy is to align the performance of the teams with the Group's long-term objectives.

Its design and planning involves the Legal Representation of Workers (RLPT), through the Collective Bargaining Agreement for Credit Cooperative Societies, and the Group's management. It must then be approved by the Remuneration Committee and, finally, signed off by the Governing Board.

The objectives include the essential one of financial profitability but also other key aims for a cooperative entity with strong local roots:

- Growing the customer base.
- Customer connection and loyalty.
- Positive market perception of the Group's service and value added.

The basic criteria that flow from this core aim are as follows:

- A.** Individual remuneration shall fairly reflect each employee's responsibility and professional career. It must be reviewed regularly (at least annually) and changed where appropriate.

- B.** variable remuneration, which is discretionary and non-obligatory, shall take account of employees' performance, results achieved by their team and results achieved by the Bank as a whole. It will create no direct incentives to sell specific projects, such as discounts or fee reversals.

- C.** Variable remuneration must be capped as a proportion of fixed income and can never be more than 100 % of fixed remuneration, as required by regulations in force.

- D.** It should always be based on the qualitative issues most closely related to long-term performance (maintenance of the customer base, customer satisfaction, balanced growth, etc.).

- E.** Part of variable remuneration shall be deferred for between 3 and 5 years, tied to completion of the Strategic Plan for this period.

- F.** Customer satisfaction data feeds into the design of remuneration policy.

- G.** Variable remuneration shall include a clawback clause allowing the Cooperative Bank to retrieve sums paid in the event of fraud, disciplinary dismissal or misconduct that causes serious damage to the Bank.

- H.** Before agreeing any payment, the Bank must make sure that minimum solvency requirements will continue to be met so its solvency is not imperilled and check it against the detailed indicators in the Risk Appetite Framework.

Basic pay structure is set out in the Collective Agreement of Cooperative Credit Institutions, agreed between the employers of the National Union of Cooperative Credit Institutions, ASEMECC

and the unions, which sets the standard for all employees.

Once regulatory requirements have been met, the remuneration of each employee is set individually based on their individual career. Fair treatment is ensured by looking at a set of standardised functions for which they are responsible.

In accordance with Caja Rural de Navarra's Equality Plan and applicable regulations, the salary gap is analysed and conclusions drawn on reducing gender pay gaps.

Data from individual pay awards are aggregated to check they match the Bank's budget and ensure there is no overrun during the year.

**[DP 95, 97, AR98, AR99, AR100, AR101]** Caja Rural de Navarra Group has a methodical and structured system for measuring the gender pay gap, ensuring an accurate and transparent approach in accordance with legislation in force. First, the average gross pay per hour worked is determined, differentiating between male and female staff, providing a standardised measure for assessing the wage gap between the two groups without distortions due to the number of hours worked. The specific formula for calculating the gender pay gap is then applied. This takes the difference between the average gross hourly pay of men and women and divides it by the level of men's pay. The result is multiplied by 100 and

expressed as a percentage, which makes it easier to interpret the size of the pay gap.

The following tables show average total remuneration received by gender, in line with the specifications of Royal Decree 902/2020 of 13 October on equal pay for men and women. Regulations require that for comparison purposes the remuneration received by men and women must be grouped by jobs graded as of equivalent value in the company. The average gross gap at Caja Rural de Navarra Group in the 2024 and 2023 financial years was as follows:

Gender pay gap	2024			2023		
	Caja Rural de Navarra	Investees	Total	Caja Rural de Navarra	Investees	Total
Total wage gap	22,72%	29,64%	31,17%	24,57%	30,52%	31,67%

The calculation of the minimum salary within Caja Rural de Navarra Group is based on the lowest salary scale defined in the Group's remuneration structure, excluding employees in training, who have special salary conditions.

The gender pay gap is the percentage difference between men's and women's average wage, divided by the average total male wage (gender pay gap/male wage).

Below is a comparison between the total annual remuneration of the highest earning employee in the organization and the average and median remuneration of Caja Rural de Navarra Group staff:

Average total remuneration by category, gender and age	Average fixed remuneration			Average variable remuneration		
	Man	Women	Total	Man	Women	Total
Senior management and assimilated personnel						
Over 50						
Between 30 and 50						
Under 30						
Management						
Over 50	1,92	1,62	1,86	3,24	2,44	3,06
Between 30 and 50	1,39	1,23	1,33	2,01	1,71	1,90
Under 30	0,93	0,88	0,90	0,93	0,96	0,95
Managers and technicians						
Over 50	1,74	1,25	1,67	2,52	1,69	2,41
Between 30 and 50	1,35	1,13	1,27	1,79	1,24	1,60
Under 30	0,70	0,71	0,70	0,31	0,46	0,36
Administrative/Sales						
Over 50	1,14	1,04	1,10	0,79	0,75	0,77
Between 30 and 50	0,93	0,88	0,90	0,71	0,65	0,67
Under 30	0,60	0,61	0,60	0,17	0,19	0,18
Various trades						
Over 50	0,85		0,85	0,87		0,87
Between 30 and 50		0,63	0,63		0,00	0,00
Under 30						

Pay inequality data	Caja Rural de Navarra	
	2024	2023
Pay inequality ratio	6,84	6,73

The tables below detail the average total remuneration received, following the guidelines in Royal Decree 902/2020 of 13 October on equal pay for men and women:

Average remuneration (EUR thousands) of Directors	2023			2024		
	Man	Women	Total	Man	Women	Total
Senior management and assimilated personnel						
Over 50	N/D	N/D	N/D			
Between 30 and 50	N/D	N/D	N/D			
Under 30	N/D	N/D	N/D			
Management						
Over 50	N/D	N/D	N/D	2,06	1,70	1,98
Between 30 and 50	N/D	N/D	N/D	1,46	1,28	1,39
Under 30	N/D	N/D	N/D	0,93	0,89	0,90
Managers and technicians						
Over 50	N/D	N/D	N/D	1,82	1,30	1,75
Between 30 and 50	N/D	N/D	N/D	1,39	1,14	1,30
Under 30	N/D	N/D	N/D	0,66	0,68	0,67
Administrative						
/ Commercial	N/D	N/D	N/D	1,11	1,01	1,06
Over 50	N/D	N/D	N/D	0,91	0,86	0,87
Between 30 and 50	N/D	N/D	N/D	0,56	0,57	0,56
Under 30						
Various trades	N/D	N/D	N/D	0,85		0,85
Over 50	N/D	N/D	N/D		0,56	0,56
Between 30 and 50	N/D	N/D	N/D			
Under 30						

Average remuneration (EUR thousands) of Directors	2023		2024	
Executives	0	0	0	0
Non-executives	51,8	9,5	58,9	11,5

The benchmark wage used for comparison with the lowest wage complies with the minimum standards set by Directive (EU) 2022/2041 of the European Parliament and of the Council on adequate minimum wages in the European Union. Until full implementation of Directive (EU) 2022/2041, in those EEA countries where there is no minimum wage defined by law or collective

bargaining, the Group will use a benchmark wage value that equals or exceeds the minimum wage of a neighbouring country with similar socio-economic conditions, or a common international standard, such as 60% of the national average wage and 50% of the gross average wage.

## S1-17: Human rights

Caja Rural de Navarra Group has a Code of Conduct that governs the way we act. Compliance with the code is how the Group assures respect for Human Rights in its business activities, socialising the Group's values of proximity, commitment and responsibility in all channels of communication with employees.

For this to work, everyone needs to be aware and work together to avoid and correct any type of inappropriate conduct.

During the induction process, new employees are given a guide to policies that workers must comply with and apply as members of Caja Rural de Navarra Group, which is available for consultation as necessary.

The Group's management and employees must always act in accordance with ethical principles and behaviour for the service and benefit of all,

which, fundamentally, is the reason the Bank was founded and the basis for all its actions. Part of this comes down to the people who work in the Group every day, in the way they behave at work and outside.

Ethical behaviour of employees in the way they relate to other colleagues, members, customers and suppliers is one of the fundamental ways to maintain and improve the Group's reputation. Again, at Caja Rural de Navarra Group we seek to support various projects to promote cooperation on international development, so fomenting respect for human rights.

The Bank also believes that such ethical behaviour is good for the Groups growth and profitability over the long term. Therefore, besides the moral and human imperative, ethics must be included as a basic part of our business policies and objectives.

Number of incidents of discrimination.	2024			2024		
	CRN (parent)	Investees	Consolidated group	CRN (parent)	Investees	Consolidated group
No. of complaints	1	0	1	1	0	1

Number of complaints lodged through channels for own staff members	2024			2024		
	CRN (parent)	Investees	Consolidated group	CRN (parent)	Investees	Consolidated group
No. of complaints	0	0	0	0	0	0

## ESRS S3 Affected communities

### STRATEGY

#### SBM-2: Interests and views of stakeholders

[DP 7, AR 3]

The mission, vision and values of Caja Rural de Navarra determine its business model, working philosophy and how it relates to its environment. They are key elements of its culture. Its principles influence the business strategy and business model and determine the Bank's working philosophy and how it relates to its internal and external stakeholders.

Caja Rural de Navarra's relationship with society is a differentiating factor, given that, as a cooperative and regional institution, it needs to maintain a close relationship with wider society in the areas where it operates. In order to ensure that the Bank continues to be seen as a close entity, it focuses its efforts on supporting local initiatives, as it has far more direct knowledge of the economic and social realities of the towns and cities in our regions. It acts as a local partner that backs key social groups to support long-term community development, such as SMEs, entrepreneurs, grass-roots sport and educational and cultural activities, with an inclusive focus for the different social groups that is sustainable over time.

Its local footprint and strong commitment to its community make it a major social actor. It is a clear

competitive advantage, providing a direct line to the real demands and needs of the community. Maintaining local decision-making centres mean we can also offer a swift and flexible response thanks to our knowledge of the territory and its people. All of which makes it easier for the Group to maintain close relationships with economic and social agents, who it deals with guided by its principles of Corporate Social Responsibility.

Accordingly, Caja Rural de Navarra projects its social purpose through four areas of activity:

- Promoting people's health and quality of life.
- Promoting education and technology, supporting digitization processes.
- Supporting entrepreneurship and innovation as a route to progress.
- Protecting the environment and local development of the communities where it operates.

Note that commitment to its surrounding community is a Group-wide priority and embraces all Group companies and employees and all the Group's actions.

The Group has investee companies that play an important role in the industrial development of the region or are significant employers for the municipality and surrounding areas. Due to this, the activities carried out by the Group are managed taking into consideration the following points:

- The products and services produced must be in line with the needs of the customers and of the highest quality standards.

- R&D is a source of sustainability for the business and adapts the product or service to evolving needs.

- Investments must be productive and quality-related

In addition to the above, Caja Rural de Navarra focuses its efforts on continuing to promote, drive and showcase initiatives and projects that support people and organizations, advancing the socio-economic transformation of the community and helping create a fairer community founded on solidarity. Caja Rural de Navarra uses its Education and Development Fund (EDF) as the main driver of its Acción Social.

The Fund is used to return part of its profits from its financial activity to the community as what we consider to be a social dividend. Each year, it mounts a major effort to support value-generating projects which help improve quality of life in our community, providing solutions to different social, environmental, sporting and cultural needs.

As an active social agent in the communities where it operates, the Bank collaborates with civil bodies and strongly supports organizations that work to help integrate into society groups at risk of social exclusion: immigrants, the gypsy community, minors, drug addicts and the elderly unemployed.

#### The EDF follows these guidelines according to its Articles of Association:

- Donate 10 per cent of the available surplus (profit) each year to the Fund.
- Support activities that fulfil one of the following aims:
  - Training and education of Caja Rural de Navarra members and employees in the

principles and values of the cooperative movement or in specific matters relating to its corporate or labour-related activity and other cooperative activities

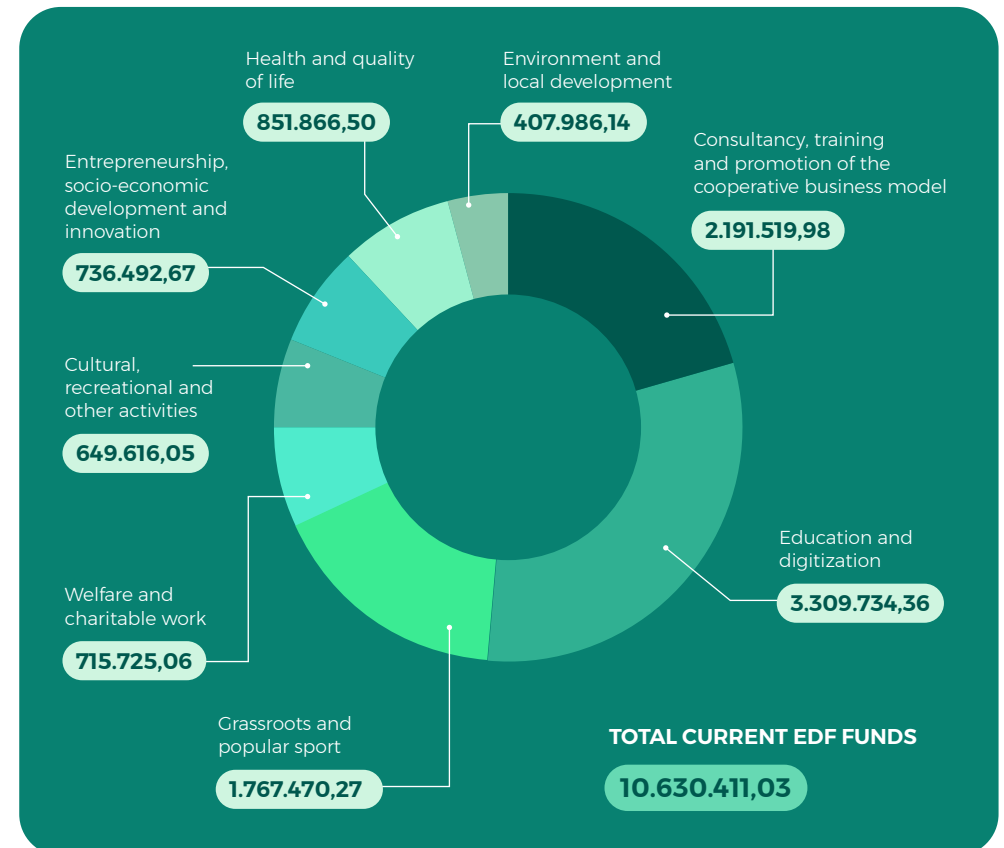
- Promoting the cooperative model and fostering relationships between cooperative entities.
- Cultural, business and welfare initiatives serving the local area or community in general, initiatives that enhance quality of life, promote community development and/or protect the environment.

In 2024, Caja Rural de Navarra Group supported hundreds of actions in areas such as sport, culture, education, health, research, the environment, social welfare, professional development, entrepreneurship, training and cooperative development, spending a total of EUR 10,630,411.03 a 39% increase on 2023.

Likewise, a major investment has been made in the Espiga Cereal Innovation Centre, a pioneering centre built in Sarriguren (Navarre), which aspires to be a European benchmark for research. All in all, funds allocated in 2024 amounted to EUR 12,669,500.69.

Caja Rural de Navarra projects its social purpose through the 8 funding lines approved by its General Meeting. Below is a breakdown of the EDF expenditure in each of the 8 lines of activity approved by the CRN Assembly:

As an active social agent in the communities where it operates, in 2024, Caja Rural de Navarra has continued to support individuals and companies in our territory, by granting financing for social inclusion projects. Based on analysis of the Group's information, we can conclude that the financing line for social inclusion projects totals EUR 20.2 million, spread between 133 loans. These figures have been classified into the following loan categories:



### **BUILD CULTURAL FACILITIES, SUCH AS COMMUNITY CENTRES, FOR SOCIALLY OR ECONOMICALLY MARGINALISED GROUPS:**

→ **Balance:** EUR 2.6 million  
→ **Number of loans:** 18

In this area, it should be noted that Caja Rural de Navarra has been supporting organizations that bring together people with disabilities for many years. These organizations run training and rehabilitation centres as well as special employment centres to support people into work. Altogether they offer training and rehabilitation to over 7,000 people and employ more than 6,000. In this way they support a substantial proportion of those with disabilities in Navarre, the Basque Country and La Rioja.

In addition, Caja Rural de Navarra has a clear commitment to people of all ages, origins and social classes. This is why it strongly supports organizations that work to help and integrate these groups at risk of social exclusion into society: immigrants, the gypsy community, minors, drug addicts and the elderly unemployed.

### **PROVIDING EMPLOYMENT TRAINING PROGRAMMES OR FACILITIES FOR YOUNG PEOPLE, THE UNEMPLOYED, THE PHYSICALLY OR MENTALLY DISABLED, OR ANY OTHER SOCIALLY OR ECONOMICALLY MARGINALISED GROUP:**

→ **Balance:** EUR 3.1 million  
→ **Number of loans:** 18

The social and economic fabric in which Caja Rural de Navarra is present is strongly developed through associations and professional associations and research centres. Caja Rural de Navarra firmly

supports this social fabric by financing the essential infrastructure such groups rely on. These associations help ensure that small businesses and the self-employed are kept permanently informed on tax, employment, legal and financial matters. They also have representative bodies speaking to the government and different private organizations.

### **PROVIDING AFFORDABLE HOUSING/CARE FOR THE ELDERLY, WHETHER IN THE FORM OF NURSING HOMES OR DAY CENTRES OR SIMILAR FACILITIES/SERVICES:**

→ **Balance:** EUR 14,4 million  
→ **Number of loans:** 97

In light of an increasingly ageing population, Caja Rural de Navarra supports the construction of infrastructure and essential facilities to support health care and social and health inclusion for seniors and for young people with some degree of dependency.

In addition to the social value that Caja Rural de Navarra generates and actively seeks to generate in the communities in which it operates, it makes sure that in all its activities it not only complies with the highest ethical standards and respects stakeholders' rights, but also considers their views and their interests. In this way it pursues continuous improvement and long-term management that respects stakeholders.





## HUMAN RIGHTS

Caja Rural de Navarra has policies on its corporate values that extend to its investees, requiring respect for human and labour rights, not only because the law requires it, but also because there is no other way of conducting the Group's activities. Likewise, respect for a decent salary, suitable working conditions, safety at work, freedom of association, appropriate working hours and respect for labour regulations are fundamental rights throughout the Group and extending to its suppliers.

These values are not only respected in Spain, of course, but also affect some international operations, even beyond the borders of the EU. For example, when importing cereals, we work with other cooperatives or international companies with recognised CSR credentials, whose ethical values are well-defined and well-known.

## DIALOGUE WITH STAKEHOLDERS

Dialogue with the Bank's stakeholders is seen as a necessary tool for determining the Bank's Corporate Social Responsibility strategy.

By way of example, as part of its CSR strategy, the savings bank has internship programmes that reflect its commitment to the integration and training of local young talent. Also, each year Caja Rural de Navarra carries out an anonymous survey on the experience of this group to analyse factors affecting Caja Rural de Navarra's image as an employer.

To maintain close relationships with these stakeholders based on trust and open dialogue, Caja Rural de Navarra has a number of channels of communication and also runs procedures and initiatives to ascertain their needs and expectations. These then feed into its continuous improvement process. The mechanisms for

dialogue with different stakeholders are shown below.

### Dialogue with customers

- Customer services department
- Social networks
- Customer satisfaction survey
- Suggestion box
- cajaruraldenavarra.com website
- General business relationships
- Materiality survey conducted to prepare this Report
- Materiality focus group convened to prepare this Report.

### Dialogue with employees

- Employee portal
- Caja Rural de Navarra Group website
- Works Council (Comité de Empresa)
- Internal Communications Group
- Materiality focus group convened to prepare this Report.
- Weekly business meeting
- Area meetings
- Business coordination through management committee

### Dialogue with suppliers

- Business and contractual relationships
- Quality surveys
- Materiality survey conducted with the Bank's biggest suppliers

It also has the following public communication channels:



The information gathered and analysed as a result of these dialogue processes feeds into the development of guidelines and initiatives, not only in terms of CSR but also in many other key areas for the Bank, as we will see throughout this section.

## DOUBLE MATERIALITY

In 2024, Caja Rural de Navarra Group carried out a double materiality assessment, again including extensive consultation with all its stakeholders during the last quarter of 2024.

This double materiality process included a structured stakeholder consultation to formalise the assessment. Every person or group who has an impact on or is impacted by the Bank's activities, products or services, and who therefore has an interest in Caja Rural de Navarra Group, was included.

The materiality analysis, conducted with support from a specialist third-party consultancy, focused on identifying and prioritising the economic, environmental, social and governance issues that mattered most for customers, employees and suppliers (external materiality) and for the business strategy, as it overlapped with the same issues

(internal materiality). This makes it possible to identify the Bank's impacts on these stakeholders and consider how best to manage them.

## SBM-3: Material IROs and their interaction with strategy and business model

**[DP 8, 11]** For the purposes of the double materiality assessment carried out by Caja Rural de Navarra Group, the Group identified impacts and opportunities related to its social engagement and relationship with the wider community which, if realised, could positively affect the Bank's Acción Social, reputation or corporate responsibility. Noted that no material risks were identified in this area.

The impacts are categorised according to their likelihood of occurrence and severity for Caja Rural de Navarra Group. All the material impacts identified in the analysis were found to be actual positive impacts for the Group, as they related to corporate volunteering which has a positive social, cultural and environmental impact on the communities where it operates. In this field, Caja Rural de Navarra Group has promoted actions with a range of purposes and target audiences such as:

- Training workers in the areas that matter most to them doing their job properly, so they can provide a top-quality service.
- Promoting cooperative structures, which constitute a diverse source of businesses, and helping consolidate and improve cooperatives, especially in the primary sector, which represent the community the Bank came from.
- Strengthening the quality of advice to customers, both in tax matters and in the management of Community aid.



The following are some of his most significant collaborations by purpose.. **[DP 38]**

Collaborations on **training and promotion of the cooperative model** included the following:

- **MONDRAGON CITY CHALLENGE:** an international championship for cooperative entrepreneurship that invites high-school and university students from across the world to develop their entrepreneurial management skills and their ability to build a successful cooperative business model.
- **LOCAL COOPERATIVISM:** development of training and professionalization programmes for cooperativism in the primary sector, through collaborations with some of the best-known agricultural and livestock farming organizations, such as UCAN, Abelur and Lurgintza.
- **CAP ADVICE:** to facilitate the processing of CAP aid for farmers/breeders in our area, by means of free assistance from a team of professionals specialising in this field.
- **LOCAL COOPERATIVISM:** development of training and professionalization programmes for cooperativism in the primary sector, through collaborations with some of the best-known agricultural and livestock farming organizations, such as UCAN.

€ The total budget in this area is  
**EUR 2,191,519.98**

**Welfare and charitable initiatives,** including the following:

- **INNOWALK PROJECT:** collaboration with APDEMA (Association for People with

Intellectual Disabilities of Alava), to promote the physical autonomy of children using a technological device that allows them to acquire mobility within their physiotherapy programme.

- **GAINDITU SARIAK AWARDS:** solidarity awards given in collaboration with the Carmen Gandarias Foundation that honour social organizations and so showcase good practice in the third sector in Bizkaia.
- **MENTAL HEALTH:** programme to support sport and leisure activities for people with mental health problems, in collaboration with AGIFES/WHY NOT.
- **SOCIAL COMMITMENT AWARDS:** awards to recognise third sector organizations in La Rioja that have stood out from the rest with their social projects in one of the three defined categories: Social Impact, Social Innovation and Social Scalability.
- **HOMBRE NAVARRA PROJECT:** Programme of support for prevention, social awareness, care, comprehensive treatment and research into the problems of drug use and addictions.
- **SOLIDARITY GARDENS:** Socialization project through which retired people develop their gardening skills while growing products that offer a healthy food solution to solidarity projects and people in vulnerable situations.

€ The total budget in this field is  
**EUR 715,725.06**

**Cultural activities,** paying special attention to popular culture and social dynamization, such as:

- **PLACE NAMES IN THE PEÑAS DE AIA NATURAL PARK:** installing plaques to preserve the traditional place names on the Gipuzkoa side of this natural park, together with geolocation codes for emergencies, in collaboration with the Mountain Federation of Gipuzkoa and the Diputación Foral de Gipuzkoa.
- **NAFARROA OINEZ:** support for the ikastolas festival in Gipuzkoa and Navarre that works to promote euskera (the Basque language) and defend people's linguistic diversity.
- **FLAMENCO ON FIRE FESTIVAL:** collaboration with one of the most important music festivals with the greatest national and international reach in this genre and with a clear social awareness by bringing flamenco closer to people with brain damage.
- **TEATRODIX FESTIVAL:** promotion of a benchmark initiative in what is known as social theatre, which aims to offer vulnerable people an alternative means of inclusion through the performing arts.

€ The total budget in this field is  
**EUR 649,616.05**

Programmes promoting **health and quality of life**, with a focus on the elderly:

- **LAS CUATRO TORRES ASSOCIATION:** collaboration with the most important association of retired people and widows and widowers in Alava, to support them with their programme of leisure activities.
- **II EUSKOFEDERPEN ENCOUNTER OF EUSKADI SENIORS:** support for the annual meeting of associations and clubs for retired

people in the Basque Autonomous Community, held in Eibar.

- **PAMPLONA SPORTS AND SOCIAL PRESCRIPTION:** support for Pamplona Municipality's programme offering therapeutic sports activities on health recommendations, in collaboration with the Navarra Health Service and in conjunction with local health centres.
- **VOCES CON SOLERA:** Creation of a senior choir, a project developed with the Orfeón Pamplonés and the Solera Foundation, which has 60 participants, although more than 200 people applied for the selection process. It has good media coverage.
- **SOLERA RURAL:** social innovation project developed with the Solera Foundation whose aim is to improve the quality of life for older people in rural areas, by diagnosing needs and implementing action plans that allow them to access high-quality care and services, maintaining the local population.
- **ACTIVE AND HEALTHY AGEING:** programme of physical, cognitive and social activities aimed at senior citizens to help them stay active and improve their physical and mental health.
- **CIMA:** collaboration agreement with the Centre for Applied Medical Research to support three scientific projects against cancer, through the development of combined immunotherapy strategies, development of molecules to stimulate the immune system and CAR-T therapies.

€ The total budget in this field is  
**EUR 851,866.50**

**Environmental protection and local development actions.** The forestation and environmental awareness projects stand out. In 2024, the roll-out of the Forest Management Plan continued, with 32 initiatives in different locations in Navarre and the Basque Country (vs. 21 in 2023), with a total of 447.22 hectares of preparation and cleaning (vs. 349.14 in 2023), as well as 30.38 hectares replanted (vs. 73.53 in 2023). Likewise, 5 environmental education projects were carried out, with the participation of 183 people. In addition to these forestry actions, there are other environmental protection initiatives such as:

- **GRANJA ESCUELA - HARITZ BERRI:** collaboration with this environmental education project located in Ilundain, which promotes workshops, camps and tree-planting for schools and families, a space which receives more than 5,000 visitors a year.
- **PAMPLONA ELECTRIC BICYCLE FOR RENT:** promotion of sustainable mobility in the city, through the development of different actions aimed at activating new users of this service.

€ The total budget in this field is  
**EUR 412,986.14**

Opportunities were assessed based on both likelihood of occurrence and potential impact, which allows informed decisions to be taken on which opportunities can generate the greatest benefits for the Group if they are properly managed. Material opportunities identified for Caja Rural de Navarra Group included business opportunities through financing/investment in projects that address social challenges or help relieve social and financial inclusion of vulnerable groups, adapting to new social trends. The likelihood of occurrence

was considered high, given that Caja Rural has already written sustainability and inclusive financing criteria into its investment strategy.

Also, each year, the Bank allocates a percentage of its profits (approx. 10%) to social, cultural or environmental projects through its Education and Promotion Fund. So the likelihood that it will continue to explore business opportunities through financial and social inclusion is high.

**[DP 10]** Furthermore, Caja Rural de Navarra Group has not identified any groups that are or could be negatively affected by the development of its activities.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### S3-1: Policies related to affected groups

**[DP 12, 14, 16, 18, AR 9]** Caja Rural de Navarra Group is fully convinced that ethical behaviours and respect for human rights are beneficial over the long term to the quest for growth and maximum profitability for the Group. Therefore, in addition to their moral or human obligation, they must be included as core policies and objectives of the business.

In this respect, the Group has various internal policies and systems in place to ensure respect for its corporate values:

- **Sustainability Policy<sup>1</sup>:** Among its principles are to defend human rights, combat poverty

and create policies to promote equality and financial inclusion.

- **Code of Conduct:** compliance with the Code of Conduct is the way in which respect for human rights is addressed in the Bank's business activities. This Code of Conduct, which is communicated to all employees, is available in the Documentation Centre (Caja Rural de Navarra intranet).
- **Protocol on prevention of workplace harassment, sexual harassment and gender-based harassment:** this includes the Group's firm commitment to "zero tolerance" for any type of discrimination.
- **Work-related Risk prevention management system:** this builds on the provisions of the Work-related Risk Prevention Plan as regards procedures and associated record-keeping.
- **Commercial communication policy:** This regulates all advertising activities by Caja Rural de Navarra that refer to banking operations, services or products or investment products and services, including payment services, aimed at both customers and potential customers of Caja Rural de Navarra. It specifies that advertising messages and the way they are presented must be suited to the characteristics of the target group, promote full understanding of the advertising piece and avoid systems of advertising appeal that are manifestly incompatible with the protection of the interests of said group. In no circumstances can the advertising message create false impressions or expectations that, in any way, act as an incentive to contract the product or service offered or may create an appearance different

from the reality regarding the characteristics or duration of the advertised offer.

- **Product and services governance manual:** this manual sets out in detail the principles underpinning the procedures for the creation/issuance or distribution of products or services by the Bank to its customers, and the principles for reviewing existing offers, ensuring compliance with current legislation and codes of good banking practice.

All the corporate values policies of Caja Rural de Navarra also cover its subsidiaries. Human and labour rights are respected not only because the law requires us to do so, but also because it is the way we understand our work in the CRN Group.

**[DP 15, 17, AR 10]** However, given the scope of CRN Group's operations, none of the above policies expressly refer to the UN Guiding Principles on Business and Human Rights, the UN Declaration on the Rights of Indigenous Peoples, or some other internationally recognised core conventions.

**[DP AR 12]** It should be noted that, in line with the above, Caja Rural de Navarra Group is not aware of any complaints of human rights violations against suppliers or customers.

### S3-2: Processes for engaging with affected communities about impacts

### S3-3: Processes to remediate negative impacts and channels for affected communities to raise concerns

<sup>1</sup> Sustainability Policy: <https://www.cajaruraldenavarra.com/sites/default/files/gobierno-coorporativo/politica-de-sostenibilidad-v2.pdf>



**[DP 19, 21, 25, 27, 28]** To promote its values throughout the organization and create a structured path for the resolution of ethical dilemmas that may arise, the Bank has created an Ethics Channel for employees and third parties. Both groups can use this to securely and confidentially report any potential irregularities so that they can be investigated and studied by the competent bodies, with the aim of preventing inappropriate or unauthorised actions or conduct. This is in addition to the ordinary internal control and review work instituted by the Group..

Suggestions and enquiries related to possible violations of the regulations can also be raised through the Ethics Channel. The Bank has an Ethics Channel Regulation, approved by the Governing Board, which sets out the procedure for using it as a conduit for complaints.

At the subsidiaries, quality assurance policies are developed when defining the production process, and the different manufacturing and service

companies establish metrics for measuring the quality – as perceived by the producer – of the products and services received or enjoyed by the customer/user.

However, it is also essential to have a process for customer complaints to surface. The channel for comments, complaints and claims varies from sector to sector, but we believe it is appropriate and accessible to customers, consumers or users of our services:

- In the cereal sector, each company has a general hotline to deal with complaints and comments, which leads to the quality control department.
- In the care sector, although there is a telephone helpline, complaints come through two main channels: the ward or day centre manager, in the case of a complaint that needs to be resolved immediately, and satisfaction surveys in the case of non-urgent or less specific issues.

- In the winery services sector, there is a customer service telephone number, but given the nature of the customer, complaints and comments are always submitted to the sales team.
- In Caja Rural's support companies, complaints are generally made directly by telephone. They are rarely made through the Caja Rural branch network or in person.

For the management and processing of communications received through the Ethics Channel, the Bank has created the role of Channel Managers, structured into the following units::

- The Criminal Compliance Body via its Technical Unit for Criminal Compliance: this is generally the Channel Manager for all communications except those expressly assigned to the different managers in the cases indicated below.
- Management of the People Internal Area: Channel Manager for all communications

related to workplace, sexual and gender-based harassment.

- Internal Control via its Money Laundering Prevention Service: Channel Manager for all communications related to money laundering and terrorist financing.
- Management of the Regulatory Compliance Area: Channel Manager for all communications related to breaches of the Group's Internal Governance System, as well as any conflicts of interest that may arise.

The reporting of conduct that could constitute workplace, sexual or gender-based harassment always goes through the Group's Ethics Channel and is managed in accordance with the Protocol for the prevention of workplace, sexual and gender-based harassment.

Caja Rural de Navarra also has an Ethics and Conduct Committee, made up of the heads of

the internal areas Regulatory Compliance, Legal, Internal Authorization and Human Resources. Among its delegated functions is the processing of complaints received through the Ethics Channel, which are analysed by the Committee itself. It is also responsible for initiating and coordinating the investigation work for each of the complaints it is required to investigate.

Communications will be investigated in accordance with the general Internal Reporting System Procedure approved within the Bank, ensuring the strictest transparency, objectivity and confidentiality. To this end, the Group will not tolerate any retaliation against persons submitting any communication

**[DP 22, 23]** It should be specified that the profile of the informant is not considered in the processing and management of the communications received. For this reason, the Group does not currently have systems in place to identify whether the groups affected may be particularly vulnerable to incidents.

Finally, as mentioned above, the major quality or security incidents are reviewed on a monthly basis by the Management Committees and at regular meetings with Bank executives.

### **S3-4: Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions**

**[DP 30, 32, 33, 34, 35, 36]** No material negative incidents have been identified in relation to

the groups affected, nor have any complaints been reported by Caja Rural de Navarra Group for violation of human rights at suppliers or customers. Therefore, no measures have been defined to mitigate risks related to this type of incident, beyond the control systems established through the internal policies and procedures already mentioned.

**[DP AR 41]** The Sustainable Finance and ESG Risk Policy refers to social risks, defined as those risks posed by the exposure of entities to counterparties that can potentially be negatively affected by social factors. Such social factors relate to the rights, welfare and interests of individuals and communities that may have an impact on the activities of counterparties. Social risks include inequality, health, inclusion, labour relations and investment in human capital and communities.

The Commission's Platform on Sustainable Finance is currently considering a possible extension of the existing environmental taxonomy to include social targets, such as respecting human rights and promoting adequate living conditions. A number of underlying social risk drivers can be identified:

- Labour market risks, e.g. as a result of human rights violations, forced and/or child labour, poor health and safety conditions in the value chain.
- Product safety and consumer protection risks, e.g. social perception of products (gambling, weapons, tobacco, etc.), social responsibility of products, lack of product safety assurance, uncertainties about consumer protection.
- Discrimination or endangerment of cultures and ethnic groups, e.g. lack of protections for cultural assets and traditions, questionable treatment of other ethnic groups or local communities, religious discrimination, lack

of inclusion within organizations, gender gaps, lack of diversity strategy and/or policy, inequitable and unsustainable incentive systems.

- Risks related to social changes, e.g. migratory movements, political instability, conflicts over water scarcity, increased nationalism, protectionism, or changing work culture, if consumer and business customer choices shift towards products and services that are less damaging to the climate.

**[DP AR42]** The Bank will review how far and by what methods its processes for managing material risks to affected communities are integrated into its existing risk management processes.

Within the Group's Risk Appetite Framework, ESG risk is considered to be a type of risk that, should it occur, could have an actual or potential material adverse effect on the value of investments.

Furthermore, in accordance with Caja Rural's Sustainable Financing and ESG Risk policy, within the areas of general exclusion, the Group has undertaken not to finance or invest in operations, among others:

- Requested by companies where there is relevant involvement and strong evidence of disputes or incidents related to social aspects of human rights, labour rights, occupational health and safety or use of child or forced labour, as defined by the International Labour Organization (ILO) conventions..
- Requested by companies that have directly and significantly contributed to dictatorial regimes and have benefited from that situation.

Governance also plays a key role in ensuring the inclusion of environmental and social

considerations by a given partner. A corporate culture that respects equality, inclusion, fair labour standards and support for communities is a sign of good governance. On the other hand, poor conditions for employees, unfair treatment of customers or little interest in contributing to society can pose additional governance risks.

It was also identified that ESG events such as social unrest could influence the value of financial assets, which in turn could affect the liquidity of that asset, creating liquidity risk.

## **| METRICS AND TARGETS**

### **S3-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

**[DP 39, 41, 42, AR 44]** Caja Rural de Navarra Group maintains the objective of obtaining information on customers' views of service quality, as well as their user experience with the products and services offered by the Group. The ultimate aim is to identify opportunities for improvement and effectively manage the deficiencies detected.

In accordance with the importance for Caja Rural de Navarra of maintaining an open and active dialogue with the communities in which it operates, one of the areas defined in its Sustainability Master Plan is "Dialogue with the community". This sets out lines of action to strengthen the relationship between the Bank, its surrounding community and the other agents with which it interacts in its sphere of activity. It also commits the Group to:

- Increase direct investment in the local region and in social projects.
- Launch initiatives to maintain active dialogue with stakeholders by identifying key partnerships for the development of initiatives with added value for the Cajas Rurales.
- The objective of not only leading the sustainability strategy but also developing it through dialogue and relations with the Cajas.

Finally, in accordance with the above, in 2024 Caja Rural de Navarra's Acción Social continued to have a positive impact on the community, consolidating its commitment to the social, cultural, economic and environmental development of the region. With a total budget of EUR 10,630,411.03, the Bank wants to continue working to build up these initiatives in coming years, so contributing to a fairer and more sustainable society.

## NEIS S4

# Consumers and end-users

## STRATEGY

### SBM-2: Interests and views of stakeholders

**[DP 8, AR 3]** The focus of Caja Rural de Navarra's corporate activity is the customer in general and, particularly, the member in their dual role as both owner and customer. For this reason, one of the core principles that has always run through the Bank's business is customer focus.

The principles underlying the Group's relationships with its customers are as follows:

- To maintain a clear Communications and information policy.
- Not to use publicity that might be misleading, ambiguous or insufficiently clear for customers.
- To promote a socially responsible investment policy, by giving the right advice on customers' investment decisions, taking into consideration the customers' sustainability preferences in savings products and maintaining a set of lending policies based on sustainability criteria.
- To improve quality and accessibility for customers to the Bank and vice versa, promoting the use of new channels and technologies and developing innovative products and services.
- To protect the confidentiality of all data collected on customers as a consequence of business relationships.

At Caja Rural de Navarra it is understood that customers have financial needs that they seek to address with the products and services offered by the Bank, but also have expectations on the service they expect from the Bank. The Bank's response on both issues (needs and expectations) is what differentiates us from the competition.

One of Caja Rural de Navarra's priorities is to constantly improve our digital channels, without sacrificing our principals of local service and proximity to our customers. A big element here is the Bank's investment in technology to make it easier for those customers who so wish to conduct any transaction through digital channels.

This approach allows the Bank to:

- Design financial solutions adapted to each regional context, ensuring that products are relevant and accessible to customers according to their socio-economic circumstances.
- Promote innovation in its product portfolio, adjusting its offer in accordance with the trends and needs detected in each local market.
- Strengthen proximity to its customers, promoting closer banking, focused on local economic development and the creation of value for the community.

All this gives rise to a flexible and dynamic business model, where the products and services offered by Caja Rural de Navarra evolve according to the needs of the customer and the environment in which they operate.

In this respect, Caja Rural de Navarra has opted for a multi-channel customer service model, combining digital, physical and telephone channels, in order to guarantee consumers comprehensive coverage in the provision of services, tailored to their preferences.

During 2024 the Bank continued to work on improving its service to users by creating and improving the digital tools available on our websites ([cajaruraldenavarra.com](https://cajaruraldenavarra.com) and [ruralkutxa.com](https://ruralkutxa.com)), which make customers' lives easier. Highlights of the year included:

## NEW DIGITAL TOOLS

- A page where customers can set up direct debits for their bills and/or transfer their accounts with other banks online, without having to visit a branch. The sections enabled for this are: <https://www.cajaruraldenavarra.com/es/domiciliacion-recibos> and <https://www.cajaruraldenavarra.com/es/traslado-de-cuentas>
- A personal banking section: <https://www.cajaruraldenavarra.com/es/particulares/banca-personal> on the website, in the individual customers area, to foreground a new and expanding segment of the Bank's business. As well as key information about this service, users can get regular market reports to keep them up to date on investment trends.
- A page setting out the Disfruta Seguro Plan, an initiative where users can see all the insurance products and check out discounts: <https://www.cajaruraldenavarra.com/es/particulares/plan-disfruta-seguro>. The page also includes a calculator where users can simulate what discounts they would get on their various insurance policies..
- A special "Broker Online" page with a wide range of educational content to help when investing in the stock market: monitoring reports, daily videos on market news, training videos and explainers about everything that can be done with our "Broker Online" service available through Ruralvía digital banking.



## IMPROVEMENTS TO EXISTING DIGITAL TOOLS:

A number of tweaks and improvements have been made to tools already available, including:

- The loan, leasing and renting recommender in the business section of the website.
- The recommender for personal loans and mortgages in the individuals section of the website.
- The blog for companies, with articles on current economic events and weekly reports on the main news on the currency markets.
- A dedicated website where confirming customers can access, check and anticipate payments from their supplier.

## TRANSPARENCY IN MARKETING

Caja Rural de Navarra has been a member of Autocontrol since January 2011. Autocontrol is an association that seeks to promote responsible advertising that is true, legal, honest and fair. In 2024, Caja Rural de Navarra ran 38 communication projects, producing 85 publicity items, of which 56 obtained copy advice approval from Autocontrol. The rest went through the Bank's internal control process.

## COPORATE IDENTITY

The new Corporate Identity Handbook launched at the end of 2021 lays out Caja Rural de Navarra's communication strategy and purpose, based on the corporate values that make the Bank stand out in the market. In 2024 all communication actions by the Bank were tailored to comply with this Handbook.

## OFFICE COMMUNICATION MEDIA

To improve transparency and clarity in the way the branch network markets products and services, in-branch customer communications were updated quarterly in 2024.

## PRODUCT COMMITTEE

The Product Committee continued its work in 2023. It was set up in 2016 to bring all the products and services offered by the Bank under a validation process.

The Bank also continued to customise the documents highlighted and designed by BCE's Compliance Department to suit the Bank's needs and to update and approve standard documents such as the "Banking Product and Services Marketing Policy" and the Product Committee's own handbook.

This Committee met quarterly as planned. There were also 14 sessions of the Permanent Committee to approve one-off measures that were subsequently ratified in a full Product Committee meeting. Overall, 155 internal product brochures and 36 other documents were approved and/or revised. The 26 ESG fiches of the products created last year are maintained.

## QUALITY SURVEYS AND MYSTERY SHOPPING

In 2018, the Bank launched its "Measuring customer service in branches" project. The project involves all Banks in the Caja Rural Group and has two aims:

1. To ensure compliance with regulations laid down by the European Banking Authority (EBA) and European Securities Markets Authority (ESMA) on criteria for defining and setting

remuneration policies in the branch network that include quality factors.

### 2. Improving the candidate experience.

This project applies two methodologies:

- **Mystery Shopping:** The aspects assessed and their weighting in the overall assessment are: Physical aspects of the office, Speed, Treatment, Explanation of products, Sales performance. Below are the results obtained in 2024:

	MORTGAGE MYSTERY SHOPPING				
	Dec-20	Dec-21	Dec-22	Dec-23	Dec-24
Sales approach	62.93	67.70	60.69	58.69	84.38
Physical aspects	98.46	97.52	94.56	95.27	95.32
Explanation of products	57.8	63.22	55.71	56.34	55.71
Speed	94.63	93.34	90.48	93.16	88.93
Treatment	95.43	96.51	89.16	92.13	91.82
<b>Total</b>	<b>72.84%</b>	<b>76.17%</b>	<b>69.56%</b>	<b>69.91%</b>	<b>78.27%</b>

The trend was positive over the last year, particularly the improvement in "Sales performance".

- **Satisfaction surveys:** The aspects assessed and their weighting in the overall assessment are: Emotional value = 20%, service + 20% explanations + 20% documentation + 40% NPS recommender.

	SATISFACTION SURVEYS						
	Dec-18	Dec-19	Dec-20	Dec-21	Dec-22	Dec-23	Dec-24
Service	9.1	9.1	9.2	9.2	9.4	9.4	9.5
Explanation of products	8.9	8.9	9.1	9.0	9.2	9.2	9.3
Documentation provided	8.8	8.8	8.9	8.9	9.0	9.1	9.2
NPS recommendation	60%	61%	66%	63%	69%	72%	74%
<b>Emotional value</b>	<b>78,0%</b>	<b>77,9%</b>	<b>80,7%</b>	<b>79,7%</b>	<b>82,6%</b>	<b>84,0%</b>	<b>85,5%</b>





In 2024 the trend was very positive on emotional value, which has improved by more than five points over the last three years.

#### TELEPHONE SERVICE:

Customer service by telephone has been strengthened, making it easier to resolve enquiries and make transactions without having to visit a branch.

Furthermore, as explained in greater detail below, Caja Rural de Navarra has a Customer Service System offering a number of ways for customers to contact the Bank: mail, burofax, fax, email, official complaint forms of the Autonomous Communities where Caja Rural de Navarra operates, official brochures and the contact form on the website. All complaints and written communications received through the Customer Service System are brought to the attention of the Governing Board. At the same time, the Quality Committee meets every six months to analyse trends in the complaints and claims received, identify possible risks, determine the criteria to apply and make appropriate recommendations. This Committee is attended by people from different departments.

This multi-channel approach has a two-fold objective: first, to ensure accessibility for all customers, regardless of their level of familiarity with digital tools, and, second, to optimise the user experience, ensuring they can access services in the way that best suits their needs.

En suma, este enfoque multicanal tiene un doble objetivo: por un lado, garantizar la accesibilidad para todos los clientes, sin importar su nivel de familiaridad con las herramientas digitales, y por otro, optimizar la experiencia del usuario, asegurando que pueda acceder a los servicios de la manera que mejor se adapte a sus necesidades.

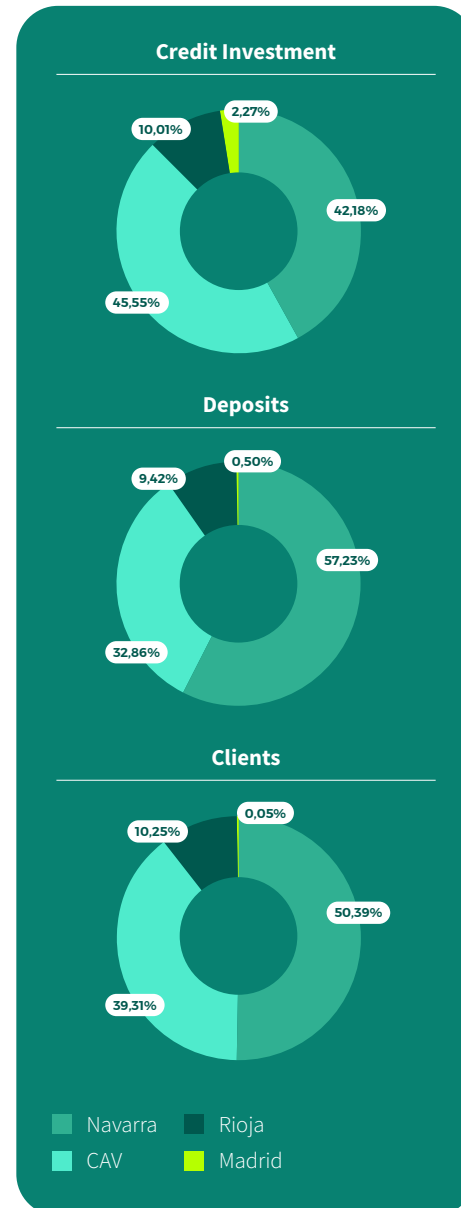
## CUSTOMER PROFILE AND DISTRIBUTION

With regard to the profile and distribution of Caja Rural de Navarra's customers, it should be noted that at 31/12/2024 the Bank had a total of 682,596 customers, of which 59,572 (8.73%) in the "Companies and Institutions" segment and 623,024 (91.27%) in the "Individuals" segment.

The table below shows the breakdown by customer type:

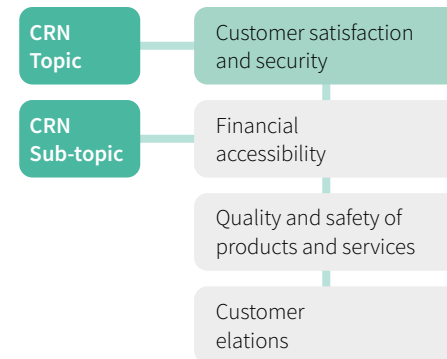
Segment	Customers
Individuals	623.024
Legal Persons	59.572
Companies	47.687
Institutions	11.521
Other	364
<b>Total (individuals + legal entities)</b>	<b>682.596</b>

The breakdown by province and the associated business volumes are as follows:



## SBM-3: Material IROs and their interaction with strategy and business model

Within the framework of compliance with the European Sustainability Reporting Standard (ESRS 2 SBM-3) and as a result of the Double materiality assessment carried out, Caja Rural de Navarra Group has identified a series of material issues in relation to its consumers and end users, ensuring their integration into the business strategy and the responsible management of their impacts:



**[DP 9, 10, 12]** Caja Rural de Navarra Group recognises that it has a considerable impact on consumers and end-users, both in terms of customer experience, accessibility and continuous improvement of its financial services. As part of its commitment to responsible and sustainable management, the Group has identified a number of material impacts, risks and opportunities in this area, which are detailed below.

In the Double Materiality process, the impacts assessed were categorised according to their likelihood of occurrence and severity for Caja Rural de Navarra Group. For these purposes, all the

material impacts identified in relation to customer satisfaction and security were considered actual positive impacts for the Group as they are related to:

- **Promoting accessibility and customer service**, provided through the multi-channel approach described above and the Group's network of physical branches, in order to combat exclusion in any area where it operates.
- **Improving the services provided by the Group** by listening to and engaging with customers via recurrent surveys and other channels, resulting in personalised attention and effective resolution of incidents. In addition to the dialogue process integrated into the materiality process and the Customer Service System, Caja Rural de Navarra's "Measuring customer service in branches" project in all the Group's branches has been running since 2018. This project uses two methodologies that are carried out simultaneously, Mystery Shopping and a Satisfaction Questionnaire, both with the aim of identifying areas for improvement in the customer experience
- **Supporting entrepreneurship** in areas vulnerable to financial exclusion, to promote social inclusion of people and communities. The Group has various initiatives and social projects, aimed at both customers and non-customers, to encourage and support entrepreneurship and the social inclusion of specific groups of the population, such as the Entrepreneurship Workshops for young people in the agricultural sector, in collaboration with the public sector company INTIA. The main goal of this programme is to address the problem of generational succession, while preventing rural depopulation and promoting the empowerment of women.

- **Integrating ESG risks into the investment management process.** Caja Rural de Navarra has a Policy for the Integration of Sustainability Risks into Investment Advice and has classified its portfolio to take account of the taxonomy regulations and their different technical requirements.

These actual positive impacts reflect the Group's efforts to maintain a close, transparent and accessible relationship with its customers, ensuring that the financial products and services offered meet their needs and expectations.

Risks and opportunities have been assessed on the basis of likelihood of occurrence and potential impact.

**[DP 11]** This identified several material risks for the Group related to the lack of adaptation to the needs of certain segments of the population, such as the young or the elderly, and reputational risks arising from inappropriate behaviour in the granting of loans.

These risks were considered to be of low to medium probability, as the Bank has a Product Committee that ensures banking products and services are designed taking into account the needs, characteristics and objectives of the target market for which they are intended, and are marketed through appropriate channels. However, the changing structure of the population and the emergence of new market demands require constant adaptation and high technological capabilities to capture and retain customer segments alienated from traditional banking and to define appropriate products and services in the investees.

The Group is also working to strengthen the consideration given to ESG risks and criteria in the

processes of credit risk management: approvals, pricing, collateral, monitoring and reporting.

As for opportunities, Caja Rural de Navarra identified a material opportunity in communicating regularly about the results and impacts of its sustainable products and services. There is a high likelihood the Bank will take this opportunity and bring it into its sustainability strategy. Under the Guiding Plan for Sustainability, part of the Sustainable Finance pillar, one of the three main lines of action is to give customers access to sustainable investment products through a catalogue and advisory services, backed up with repeated communications to these customers on the profitability and impact of these products.

#### **OFFERING SUSTAINABLE INVESTMENT VEHICLES TO CUSTOMERS**

Caja Rural de Navarra has a range of different investment services through which investment funds can be contracted.

In 2024, Caja Rural de Navarra continued to market investment funds through the same investment services as in 2023 and continued to prioritise service quality, transparency and investor protection. It pursues constant improvement in this area by adding to or enhancing the service for customers.

The Caja Rural de Navarra services that offer investment funds are:

#### **/ NON-INDEPENDENT ADVISORY SERVICE\*.**

This service offers customers advice\* on investment funds managed by Gescooperativo, with a view to recommending the investment best suited to the knowledge, experience, financial resources, investment aims and sustainability preferences of the customer, following a suitability

test and corresponding investment proposal. As part of our commitment to offer the best service, subscribers to investment funds recommended by our advisory\* services also have an annual opportunity to review the suitability of their investments in the recommended funds to make sure their investment remains appropriate to their risk profile and sustainability preferences based on information provided through the suitability test. Accordingly, once or three times a year (depending on which customer segment they belong to), all investors in funds recommended by advisory services are sent a communication with the Bank's proposal on the best allocation of assets to suit their profile and sustainability preferences in the current state of the markets.

In this Caja Rural de Navarra service, all investment funds are marketed face-to-face (in branch).

The Bank's non-independent advisory\* service also continued to market the investment funds of third-party managers in 2024. As in the non-independent advisory\* service for in-house funds, we commit to recommending to our customers the investment funds best suited to their knowledge, experience, financial resources, investment aims and sustainability preferences, following a suitability test and corresponding investment proposal. Each year, the managers responsible for these customers also send them at least one reallocation proposal.

This service is only available to Private Banking customers via the face-to-face channel (Private Banking managers).

\*Based on the definitions in Directive 2014/65/EU advice is given on a "non-independent" basis.

#### **/ DISCRETIONARY PORTFOLIO MANAGEMENT SERVICE.**

With this service, Caja Rural de Navarra customers can delegate management of their assets to the Bank, following an assessment of their investor profile and sustainability preferences by the Bank's professionals. Once they have subscribed for investment funds through this service, customers remain in continuous contact with Caja Rural to monitor the investments and verify any changes to the instructions and limits in the investment management contract.

In this Caja Rural de Navarra service, all investment funds are marketed face-to-face.

In the first half of 2024, in order to comply with sustainability regulations and meet our customers' demand for sustainability investments, the Bank extended and upgraded the sustainability module of the Suitability Tests for customers in the Advisory and DPM services. Now all Bank customers who are already receiving advice, and/or have signed up or will sign up to a CDM contract, will be able to continuously adjust the sustainability preferences for their investments.

#### **/ RTO**

Through this service, Caja Rural de Navarra customers can access a wide range of investment funds offered by well-known third-party managers unconnected to the Bank. We also make available to our customers straightforward tools that provide objective information and help them choose the funds that best suit their needs. Similarly, customers can compare various alternatives to see how they differ and take their own decisions.

In this Caja Rural de Navarra service, all investment funds are marketed through the digital (Ruralvía) channel.



### TRANSPARENCY AND INVESTOR PROTECTION IN INVESTMENT PRODUCT TRADING

In 2024, Caja Rural de Navarra continued to work to ensure that the marketing of investment products in the different services (advisory, CDM and RTO) is carried out with the greatest possible transparency and investor protection, providing the necessary resources to improve all the pre-contractual, contractual and post-contractual information received by our customers, and that this information is received by customers within the regulatory deadlines stipulated.

### IMPROVEMENTS IN INVESTMENT PRODUCT TRADING AND INFORMATION VIA DIGITAL CHANNELS

As in the previous point, Caja Rural de Navarra, throughout the year 2024, has continued to make progress so that our customers can carry out most of the operations related to investment products through digital channels, and receive all communications through these same channels, as long as the regulations allow it.

### SOCIALLY RESPONSIBLE INVESTMENT

In 2024, Caja Rural de Navarra continued to pursue its socially responsible investment strategy of recent years, from three different but related angles:

#### SALES

- The full range of pension plans and voluntary social provision plans (Entidades de Previsión Social Voluntaria or EPSVs) are managed according to socially responsible investment (SRI) criteria.

- In 2023, there was 1 Article 9 fund – compliant with Article 9 of EU Sustainable Finance Disclosure Regulation 2019/2088, the SFDR – in the range of impact funds we sell: RURAL IMPACTO GLOBAL, FI. It is an investment fund directly invested in international equities whose investment policy seeks to further the UN Sustainable Development Goals (SDGs). To measure its sustainability outcomes, the fund takes advice from independent consultants AFI Inversiones Globales, SGIC, which measures the portfolio's contribution to the Sustainable Development Goals in accordance with the ESG methodology developed for the fund. The fund ended 2024 with net assets under management of EUR 4.85 million at Caja Rural group level, up by EUR 850 thousand on end-2023.
- At end-2024, the range of sustainable funds that the Bank offers is as follows: 5 funds promoting environmental and social issues, and an environmental and social impact fund.

Rural Rendimiento Sostenible, FI.  
Rural Sostenible Conservador, FI  
Rural Sostenible Moderado, FI Fondo Sostenible y Solidario  
Rural Sostenible Decidido, FI  
Rural Impacto Global, FI.  
Rural Futuro ISR, FI Fondos Sostenible y Solidario. Total donations to charitable causes from this fund and the Fondo Rural Sostenible Moderado in 2024 were EUR 144,471.88, as follows:

- Cruz Roja: EUR 65,471.88
- Asociación Española contra el Cáncer: EUR 20,000
- Unicef: EUR 19,000
- Cáritas: EUR 40,000



This range of funds accounts for 8.45% of the entity's total fund assets. The percentage has dipped with respect to 2023 (by 14.10%), as funds with sustainable investment criteria underperformed those without. Mainly this was because high interest rates impacted the value of the companies that make up the assets of sustainable funds, and some clients are not maintaining the long-term view that is characteristic of this type of investment.

A video presentation and brochures explaining the socially responsible investment funds sold by the Bank remain available to the sales network and customers, as in 2023.

Finally, all the model portfolios used by the Discretionary Portfolio Management service continue to be managed using socially responsible investment criteria.

## REGULATIONS

Regulatory requirements on socially responsible investment continued to be implemented, following the principle of better compliance, given the lack of regulatory clarity that persists in the sector. Key actions in this area included the following:

- Governance of investment products continues to be adapted to update the target market and product brochures to the new requirements for socially responsible investment.
- In 2024 this mainly meant developing the sustainability module for the MiFID Suitability Test.

**[ DP 38, 40, 41 ]** Caja Rural de Navarra is aware that the products and prices offered by financial institutions are very similar, which is why the quality of service and proximity to customers must be differentiating factors and, probably, the key hallmarks of the Bank's identity. For this reason,

the Bank maintains its aim of gathering data on customer service quality and user experience of the products and services the Group offers.

In 2024, it also continued to provide the retail network with educational material on this point, including:

- Brochures and a sales video for the whole commercial network, which explained the key features of our socially responsible fund range..
- A module on Sustainable Finance is constantly available on the Bank intranet so employees get a better understanding of the practical application of these regulatory changes in the commercial relationship with our customers.

The key sustainability targets and working areas in 2025 will be:

- We will repeat the procedure applied in 2023 to find the right balance between the range of sustainable funds (SFDR Article 8 funds) and impact funds (SFDR Article 8 funds), the demand for such funds among our customers and the requirements of sustainability regulations.
- Continue internal and public communications and training about our range of Sustainable Funds, in line with recent years.
- Increase the range of solidarity funds; the Rural Sostenible Decidido fund will become a solidarity fund in 2025 and part of its management fee will go to non-profit organizations.
- Continue to adapt to the new regulations and requirements for sustainability in investment products.

At the subsidiaries, what end-customers are looking for in terms of products and services is wholly unrelated to what they want from the parent company.

The materiality assessment on the investees carried out in 2021, which was segmented by sub-sector of activity, found that customers particularly valued the commercial and customer service channels, the breadth of the range of products and services, the relationship with suppliers, the reduction of the environmental footprint and the contribution to economic development and growth, not to mention the working conditions.

However, to these aspects we must add, due to its key importance when it comes to requests for information and/or complaints, that, aside from price, the biggest issue is quality. Breaking this down by each sub-sector, this means:

- **Cereal sector** food safety, sensory perception of products, customer service
- **Senior care sector:** patient care and attention, incident management, food.
- **Winery and financial service sectors:** customer service, fast service.

Of these, at Group level we have always emphasised the essential nature of food safety and patient care and attention, since unless we get these key points right, no progress can be made on any of the other issues and the businesses will ultimately not be able to continue.

To optimise food safety, it is necessary to invest adequately in equipment and processes and to ensure correct and timely monitoring of the corresponding procedures, all of which is

subsequently reviewed in both public audits (FSC) and the private audits of bigger customers.

Proper treatment of patients is ensured through a strict process of staff selection, on-site training and reviews of plant and activity supervisors, and to reinforce control, KPIs and surveys are established, as discussed below.

Points S4-2 and S4-4 give further details on aspects of product and service quality management.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### S4-1: Policies related to consumers and end-users

Caja Rural de Navarra has developed a framework of regulations and corporate policies that guarantee the protection, transparency and safety of consumers and end users in their relations with the Group. These policies reflect the Group's commitment to the protection of personal data, transparency in the marketing of financial products and services and the safeguarding of customers' rights in all their interactions with the Bank.

**[ DP 13, 15, 16, 17, AR 9, AR10, AR12 ]**

Below are the main policies of Caja Rural de Navarra to ensure compliance with regulations, respect for human rights and responsible management of relations with consumers:



• **Customer Data Protection Policy:** this is fully implemented and structured in three layers of documentation, guaranteeing compliance with the General Data Protection Regulation (GDPR) and Spain's Organic Law on Personal Data Protection and Guarantee of Digital Rights (LOPDGDD). This structure ensures transparency in the processing of personal data and reinforces customer trust in the Group.

- **Data Protection Policy - Layer 1:** mandatory document that every customer or potential customer must sign when registering with the Bank. This policy details the requirements demanded by current regulations and includes the commercial consents that govern the relationship with customers.

Signing this policy is essential for the formalization of the contractual relationship with the Bank.

- **Data Protection Policy - Intermediate Layer:** a clause summarising the Data Protection Policy - Layer 1, included in the general clauses of the contracts of any product or service offered by the Bank. Its purpose is to provide customers with a clear and accessible view of how their personal data is handled in every interaction with the Bank.

- **Data Protection Policy - Additional Layer:** reference document published on the Caja Rural website, which provides

complementary information on the management of customers' personal data, guaranteeing transparent access to the applicable regulations.

• **Code of Conduct for Employees and Managers:** this establishes, among other things, the guidelines for professional and personal conduct for honest and diligent behaviour towards customers. Compliance with the Code of Conduct is how the way in which respect for human rights is addressed in the Bank's business activities in the Group's business activities.

• **Commercial Communication Policy** this regulates all advertising issued by Caja Rural de Navarra that refers to banking transactions, products and services or investment products and services, including payment services, aimed at both customers and potential customers of Caja Rural de Navarra. The scope of this policy applies to customers and non-customers of Caja Rural de Navarra, internal departments of the Bank, service providers of the Group and advertising agencies.

• **Product and Service Governance Manual:** This manual sets out the principles that underpin the Bank's procedures for creating/issuing or distributing products or providing services to its customers and reviewing existing products and services, guaranteeing compliance with applicable law and codes of best banking practice.

• **The Product Committee Manual:** this sets out the fundamental working principles for the Product Committee, whose function is to approve all the sales processes for the products and services marketed by the Bank.

• **Sustainability Policy:** its aim is to define and detail how sustainability considerations are integrated into the processes for granting different types of financing to the corresponding customers. The Policy is also designed to satisfy the demands of its stakeholders, and the requirements of EU and Spanish Supervisory and Regulatory Bodies. Its principles include to defend human rights, combat poverty and create policies to promote equality and financial inclusion.

• **Code of Practice for mortgage borrowers at risk of vulnerability,** applicable to cases in which customers have difficulties in repaying their home loan. The Bank applies Royal Decree-Law 6/2012 of 9 March on urgent measures to protect low-income mortgage debtors for borrowers in danger of exclusion, and Royal Decree-Law 19/2022, of 22 November, on mortgage borrowers at risk of vulnerability, who can show they meet the necessary requirements.

On 22 November 2022, Royal Decree-Law 19/2022 was published establishing a new Code of Practice for mortgage borrowers at risk of vulnerability and amending some aspects of Royal Decree-Law 6/2012.

Caja Rural de Navarra has been compliant with Royal Decree-Law 6/2012 since March 2012, and Royal Decree-Law 19/2022 since December 2022. Since those dates, by 31 December 2023, it has taken advantage of Royal Decree-Law 6/2012 in 88 transactions with primary residence guarantees, involving a cumulative total of EUR 9,472,165.55. A further 35 transactions were launched under Royal Decree-Law 19/2022, totalling EUR 3,348,892.10.

Customers can get all the information they need on both codes at their branch or on the noticeboard of the Bank's website: [www.cajaruraldenavarra.com](http://www.cajaruraldenavarra.com), or from the Bank. The specific personal



communications required by Royal Decree-Law 19/2022 have been sent out to mortgage customers informing them about each of the codes and the possibility of benefiting from their provisions.

• **The regulations governing Caja Rural de Navarra's Customer Services Department**

were created by Act 44/2002 of 22 November, on Measures to Reform the Financial System, and Ministerial Order ECO/734/2004 of 11 March, on customer services departments or services of financial institutions and other applicable rules.

• **Data Protection Manual:** this follows the following rules and standards to ensure data security within the Group, in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council) and Organic Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights.

**[DP 34]** Thanks to these internal policies and regulatory frameworks, the Group has sufficient systems in place to ensure that its own marketing, sales and data use practices do not cause or contribute to material adverse customer impacts.

**[DP AR 11]** It should be noted that none of the above policies expressly mention the UN Guiding Principles on Business and Human Rights.

## S4-2: Processes for engaging with consumers and end-users about impacts

**[DP 18]** In order to provide customers with a mechanism to report, manage and rectify impacts affecting them, Caja Rural de Navarra has a Customer Service Department to resolve all

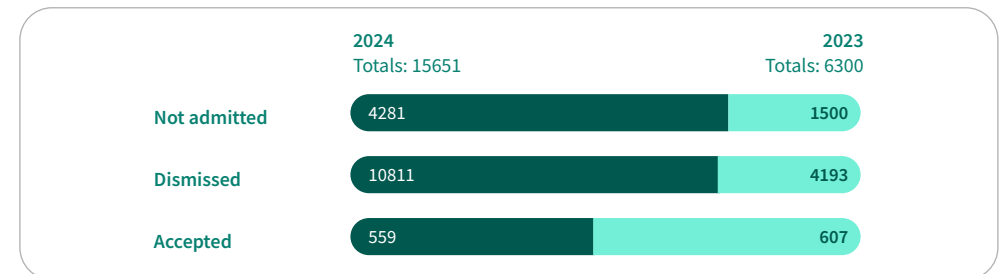


complaints and claims submitted by customers of the Bank.

The regulations governing Caja Rural de Navarra's Customer Services Department were created by Act 44/2002 of 22 November, on Measures to Reform the Financial System, and Ministerial Order ECO/734/2004 of 11 March, on customer services departments or services of financial institutions and other applicable rules.

There are various channels that customers can use to contact the department: mail, burofax, e-mail, official complaint forms of the Autonomous Communities where Caja Rural de Navarra operates, official brochures and the contact form on the website.

During 2024, the department received a total of 15,651 complaints or claims. The table below shows a breakdown of how they were resolved and a comparison with 2023:



The financial year 2024 ended with a considerable increase in the number of enquiries, complaints and claims received compared to 2023 and to previous years, in fact, as more contacts were received than ever before. As in the previous year, this was due to an increase in the number of claims about "mortgage administration costs", mainly in the first four months of the year. In 2023 this type of

claim accounted for 66.13% of 6,300 issues raised. In 2024 it was 83.97% of 15,651 issues.

Total complaints, claims, enquiries or incidents received in the financial year 2024, and claims received via the Bank of Spain:

Year	total	BoE	%
2024	15.651	28	0,18%
2023	6.300	16	0,25%

In 2024, the Customer Service department dealt with a total of 15,651 complaints, claims, enquiries or incidents, having issued a reasoned report on the rejection of 4,281 submissions. This is a 72.65% admission rate. Most of the rejections were due to a lack of data or documentation necessary for the processing of the files (accreditation of representation by a third party, police report in cases where this was necessary, etc.).

Also, 28 claims were passed up to the Bank of Spain's Banking Conduct Department. Of these, 6 related to fees for savings book and current accounts. In line with this general picture of rising volumes, the number of complaints and claims received through the Supervisor also rose, from 16 in 2023. That said, the rise was less marked than for the total of claims and complaints and they therefore fell as a share of the total.

The classification of complaints and claims by product, in accordance with the distribution proposed by the Bank of Spain, is as follows:

Subject	2024	2023
ASSETS (EUR)	14782	5363
LIABILITIES AND PAYMENT ACCOUNTS	270	257
INSTRUMENTS AND PAYMENT SERVICES	293	244
OTHER PRODUCTS/BANKING SERVICES	163	338
OTHER (investment products/services, Data Protection (LOPD))...	143	98
<b>TOTAL</b>	<b>15651</b>	<b>6300</b>

**[DP 35]** It is important to note that, in 2024, no complaints or claims related to human rights violations were received.

**[DP 20]** The Customer Services Department prepares an annual report for the Governing Board in accordance with Article 17 of Ministerial Order ECO/734/2004, including a summary of all complaints and claims received, the processes applied by the Bank following their reception, the general criteria applied when resolving complaints and claims and the recommendations and suggestions made during the year. The report is available to the Supervisor.

In addition, any critical concerns identified in the year are brought to the attention of the Governing Board. In 2024, the Board was kept informed about the surge in mortgage administration cost claims to the Customer Services Department starting in late 2023.

Every four months, there is a meeting of the Quality Committee, which is the forum used to review how complaints and claims were dealt with, identify possible risks, decide on criteria to apply and make

appropriate recommendations. The Committee is attended by people from a range of departments. It also seeks to explain the metrics for quality

incidents with work done at the equity investment. These incidents can have very different reasons depending on the business in which they occur, so, as in previous years, they are broken down by sector:

#### CEREAL SUB-SECTOR

Incidents are catalogued by category, which can be grouped into:

- Functional requirements such as product suitability to customer needs such as moisture, kneadability, protein, taste, etc.
- Logistical or administrative issues such as incorrect shipments, crossed delivery notes, a broken bag on a pallet, etc..
- Affecting food safety, such as thread residues from sack stitching, metal filings being dragged out of pipelines, etc.

They are also classed as serious or minor. All those affecting food safety are considered serious. Only some administrative or logistical faults that do not lead to the return of the product are considered minor.

As this sub-group delivers high volumes of products, it is worth noting the proportion of incidents in the specific product of oats: 17.3 per million units delivered in 2024 (69 in 2023). The level per million of incidents categorised as food safety was 3.5 (7.9 in 2023) of the total. A delivered unit is either a 24 tonne truckload of oat flour for an industrial customer or a half kilo packet for sale in a supermarket.

#### SENIOR CARE SUB-SECTOR

Quality policies are central to management of the business. The issue is approached from a multilateral perspective:

a) Surveys are conducted with residents and family members

b) Targets have been set for several years.

c) Specific annual targets for improvement are set.

d) External audits are carried out by the Department of Social Welfare.

Perceptions of quality are measured through surveys of family members when a resident leaves, and surveys of families and residents about their stay.

The annual resident satisfaction survey asks for

a score from 0 (Poor) to 5 (Excellent) on several different topics corresponding to the resident's day-to-day life, and is segmented by activities and even by floors of the residential centres. Comments or suggestions for improvement are also requested. The target score is an average of 4/5 across 17 criteria. In 2024, the result of the survey was 4.1/5 (3.9 in 2023).

The survey of family members when a resident ends their stay. Discharges are not necessarily due to death. Some are due to illness or accident and after recovery the resident returns to their routine. The target was over 4.45/5 and this year the score achieved was 4.80 (4.82 in 2023). Solera has also set multi-year targets. Thirteen general targets have been set, measured against one or more associated indicators. These targets are maintained for several years to track their performance over time. One is the number of complaints, which has been set at 27 compared to 37 in 2023. Not only the more formal, written complaints are recorded, but also verbal complaints.

Based on surveys, audits, incidents and training, an annual improvement plan is drawn up, broken

down by activities and departments. Indicators are established for direct monitoring. For 2023 and 2024, 70 indicators were set with 22 improvement actions in 2024 and 27 in 2023.

It is also usual to conduct an annual employee survey but no employee survey data was reported from this in 2024. In 2023 the biggest complaints focused on wages.

#### WINERY SERVICES SUB-SECTOR

In this case, complaints tend to be very specific complaints and dealt with immediately and directly. Complaints are infrequent in the cooperage sector and more normal in the distribution sector, mainly relating to late deliveries and logistical errors. In this sector, some complaints of an administrative nature have also been reported (incorrect delivery note, wrong goods) and also three complaints about the functional performance of the barrels.

#### FINANCIAL SERVICES SUB-SECTOR

These are end-customer service companies whose complaints are mainly due to dissatisfaction with the cost of services and delays. In 2024, complaints were received in 0.06% of the actions carried out with third parties (0.09% in 2023).

To manage this type of incident, the main quality or safety incidents are reviewed by the Management Committees and at the regular meetings with Caja Rural executives on a monthly basis. The implementation of “lean manufacturing” methodologies and the involvement of the staff in them has been an important driver of improvement in this aspect. Incidents are grouped by type and their severity is rated, so progress on improvements can be quantified by measuring these variables. Defects in raw materials are analysed in the same way.

**[DP 21]** Currently, Caja Rural de Navarra does not take into account the perspectives of customers who may be particularly vulnerable to the incidents reported when dealing with complaints and claims received through the Customer Service Department,

With regard to the deadlines for the resolution of complaints or claims, and in accordance with the provisions of the Bank’s Customer Service Manual, depending on the type of claim and the status of the claimant, the deadlines shall be as follows:

- Complaints from users (consumers and non-consumers) on matters relating to Royal Decree-Law 19/2019, of 23 November, on payment services and other urgent financial measures (the “Payment Services Law”): the time limit for resolving them is fifteen (15) working days from receipt of the complaint. Notwithstanding the above, the exception provided for in Payment Services Law 69, 2 shall be complied with..
- Consumer complaints on other matters: the time limit is one month from receipt of the complaint.
- Non-consumer complaints on other matters: the time limit is two months from receipt of the complaint.n.

Decisions must always be given with a justification, may recognise financial rights for the customer and must contain clear conclusions on the request made in each complaint or claim, based on the contractual clauses, the applicable rules on transparency and customer protection, and financial best practice. If the decision deviates from the criteria expressed in previous similar cases, the reasons for this must be stated.

We analyse a number of specific issues below:

### 1. FRAUDULENT USE OF PAYMENT MEDIA, PHISHING AND PRODUCT SECURITY

The Customer Services Department received 53 claims for fraud perpetrated through cards, transfers and Bizum payments, or retailers’ PoS terminals or a combination of the above. Of these, 19 were upheld in full or in part in favour of the customer. 16 were not accepted for processing because they lacked essential data requested from the claimants, had already been resolved. Finally, 27 were not upheld, on the grounds either that the transactions in question had been authorized by the customer and were therefore not a fraudulent use of the payment media in question or that the customer had not kept the payment media sufficiently secure, in which case regulations say claims cannot be accepted.

Of the aforementioned complaints, 3 were received through the Bank of Spain’s Entity Conduct Department.

There were no firm penalties, warnings or cases of non-compliance in this area in 2024.

### 2. INFORMATION ON PRODUCTS AND SERVICES

187 issues were raised about information and documentation on products and services in 2024. Of these, 144 were enquiries, 22 complaints, 20 claims and 1 was an incident.

There were no firm penalties, warnings or cases of non-compliance in this area in 2024.

### 3. ADVERTISING OF PRODUCTS AND SERVICES

The Customer Services Department received no consultations, complaints or claims about advertising for products and services in 2024.

There were no firm penalties, warnings or cases of non-compliance in this area in 2024.

### 4. DATA PROTECTION

During 2024, the Department dealt with one request for cancellation of the receipt of commercial communications and 24 customers asked to delete and cancel their personal data. The Department also received 19 enquiries, 3 complaints and 3 claims related to data protection. In addition, a case has been filed with the Spanish Data Protection Agency (Agencia Española de Protección de Datos).

There were no firm penalties, warnings or cases of non-compliance in this area in 2024.

## S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

**[DP 23, 25, 26]** As mentioned above, Caja Rural de Navarra has a Customer Service System with various channels for customers to send in claims. Under article 17 of Order ECO/734/2004, of 11 March, of the Ministry of the Economy, on the Customer Care Departments and Services of Financial Institutions, Caja Rural de Navarra reports annually on the performance of its system and the activity of its Customer Care System.

Service quality is one of the most important aspects for the Bank. For this reason, this report not only provides a summary of the complaints and claims received during the year, but also the treatment and analysis of these, making it possible to identify areas for improvement and supporting target-setting for the Group going forward.

Caja Rural de Navarra also has different customer relations channels, as detailed below:

### 1. BRANCH NETWORK

The branch is the usual place for conducting relationships with the customer in accordance with a business model based on local service and advice. Caja Rural de Navarra had 252 branches to serve its business at the end of 2024, distributed among the Autonomous Regions as follows: 138 in Navarre, 90 in the Basque Country and 24 in La Rioja.

Access to financial services is identified as a fundamental factor in social cohesion. In Spain, the erosion of branch networks in the banking industry over recent years could increase levels of financial exclusion in the regions.

Caja Rural de Navarra stands out against this trend, maintaining 72 branches in locations with fewer than 3,000 inhabitants. The Bank's presence in these communities is fundamental to its provision of a full financial service, which unquestionably helps sustain economic activity and so over the medium term helps prevent depopulation in these areas. This is part of the Bank's social commitment to the rural world, the market where it began many decades ago.

### ARCHITECTURAL BARRIERS TO ACCESSIBILITY:

At Caja Rural de Navarra we have long been aware of the need to have an accessible network

of branches, not only to comply with accessibility regulations but also to benefit our employees and customers.

There are now no architectural barriers in most branches. However, some, due to the features of the building where they are located, do present some minor accessibility problems. Whenever a branch undergoes renovation work, we take the opportunity to make improvements designed to improve its accessibility.

### 2. PAYMENT MEDIA (CARDS, POS TERMINALS AND ATMS)

At the end of the year, the Bank had 327 ATMs, of which 311 were in branches and 15 elsewhere.

It also had 29,592 PoS terminals in 24,277 stores and other businesses.

We have begun installing PoSs based on Android, which will allow customers to install value-added apps and, in the future, text or email paperless receipts to their customers.

### 3. DIGITAL

Caja Rural de Navarra's digital banking service is branded as Ruralvía. A Ruralvía contract allows the customer to access a wide range of financial products and services as well as conducting nearly all banking operations online through a computer, tablet or smartphone (Ruralvía app).

To guarantee secure delivery of financial services through Ruralvía, Rural Servicios Informáticos (RSI) develops security protocols that comply with legal standards.

**A new Ruralvía app was upgraded in 2023, with a modern design and new functionalities:**



Access to the new  
online broker



Integrated  
Bizum







Option to delay  
payments



Breakdown of spending  
by category

**Caja Rural de Navarra uses the following methods to communicate with its stakeholders:**

-  [bancocooperativo.es/en/customer-service](https://bancocooperativo.es/en/customer-service)
-  [blog.cajaruraldenavarra.com](https://blog.cajaruraldenavarra.com)  
[blogempresas.cajaruraldenavarra.com](https://blogempresas.cajaruraldenavarra.com)
-  [info@crnavarra](mailto:info@crnavarra)
-  Facebook, Caja Rural de Navarra, Joven In and Rural Kutxa pages
-  Joven In page - Caja Rural de Navarra
-  Caja Rural de Navarra y Rural Kutxa Joven In Caja Rural de Navarra
-  [youtube.com/CajaRuralNavarra](https://youtube.com/CajaRuralNavarra)  
y canal Rural Kutxa
-  Caja Rural de Navarra y Rural Kutxa

#### **S4-4: Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions**

**[DP 28]** With regard to the process followed by the Customer Service Department once customer complaints and/or claims are received, firstly, each one is analysed individually, with the Department working with the heads of the branches or departments affected to respond to the customer as satisfactorily as possible. Then, if necessary, the appropriate corrective measures are taken to avoid any repetition.

Incidents notified are analysed at the meetings of the Quality Committee. This Committee is made up, among others, of the following members: the Head of Marketing, a branch manager; Risk Management staff; the Head of Human Resources; the Compliance Officer; the Head of the Collections and Payments Department; staff from Organization and IT; the Head of Legal, the Head of Internal Audit and staff from the Customer Service Department.

At each meeting of the Committee, the attendees are given a details of the complaints or claims received in the period under analysis, with specific comments on most numerous or significant, so that the Department can set criteria for resolving them - based on rules of conduct, best banking practice and jurisprudence - identify possible future events that could affect the Group, ensure all of the Bank's internal areas represented on the Committee are aware of the issues and take the appropriate

preventative and improvement measures in each department and for each product that has been the subject of complaints.

**[32]** Regulations governing the Customer Care Department set a number of general resolution criteria, in line with Circular 8/1990, of 7 September, on transparency of operations and customer protection, commercial and banking practices, and banking best practice, as well as Order ECC/2502/2012, of 16 November, on the procedure for complaining to the Complaints Services of the Bank of Spain, the National Securities Market Commission and the Directorate General for Insurance and Pension Funds, and other regulations in force related to the matter that was the subject of the complaint. Case law and the resolutions of the Bank of Spain's Department of Conduct of Institutions are also followed, as are the applicable civil and commercial regulations and the terms and conditions in the contracts and other documents agreed with customers.

**[DP 33]** In the Annual Report of the Caja Rural de Navarra Customer Service Department, a section is dedicated to potential improvements to the management of files received. This section includes recommendations for improvements and proposals derived from the experience of this Customer Care Service, with a view to better achieving its aims.

By way of example, the Customer Service Department discovered that pre-approved loan contracts were being uploaded to the Ruralvía agreement number. However, they should be uploaded to the agreement number of the loan that has been signed itself. The Organization Department and Channels Department will have to review this to find a solution.

**[DP 31]** Another section of the Customer Service department report details the follow-up given

to its recommendations for improvements and proposals in the previous annual report, analysing the degree of implementation or resolution. For example, it was found that term deposits contracts did not include the fact that the withholding tax may be deducted from the capital when there is a penalty for early cancellation of the deposit. In this regard, the Bank of Spain indicates in its reports that the practice is correct but that it should be correctly stated in the contracts. For this reason, the Legal Department was informed to work on amending these contracts at group level, as it is a Group contract and an amendment is of interest to all cajas.

**[DP 34]** However, the Group does not report what approach is taken when tensions arise between the prevention or mitigation of material adverse impacts and other commercial pressures.

**[DP 30, AR 25]** In order to continue improving the quality of Customer Service, several training sessions for department staff have been scheduled for 2025:

**Regulatory watch updates to the Customer Service Department** through the UNACC and/or the Spanish Cooperative Bank.

**Different sessions/webinars** hosted by Banco Cooperativo Español and given by third party experts (Auren, FinReg360, Deloitte, etc.) on new regulations or issues of interest.

**Training course on "Customer service and complaints management"** for two Customer Service technicians, given by Banco Cooperativo Español.

The staff of the Customer Service Department certified in the LCCI regulations receive continuous, **training bulletins every six months (2 per year).**

Department employees with qualifications in MiFID regulations receive bimonthly **continuous training bulletins (6 per year).**

Cybersecurity training is provided by KnowBe4 for all Customer Service Department employees.

As in previous years, we should also point out the fundamental factors affecting our service, factors that are clearly reflected in the number of claims and complaints submitted to the Customer Services Department in 2024:

1. The image of the banking industry has been different for some years now. Banks are seen as tarnished and customers' perceptions have changed. The high profits made by all banks, the interest rate rises that have hit customers' finances, and the continuing high costs of some products have all been contributory factors..
2. Our customers have are better informed both financially and legally. They are aware of the latest regulations and rulings and able to exercise their rights.
3. There has been a proliferation of law firms and websites specialising in claims against banks. These provide general information on claims that customers can bring and even provide boilerplate claim templates.
4. There are new channels offering easy access to make claims and complaints. Customer services departments are now obliged to provide easy and prominent ways to file claims, including the requisite forms e-mail address, on the banks' websites.
5. In Navarre, some law firms are advertising and bringing pressure to bear through the media to encourage claims. Methods include sponsored news items in regional newspapers and showing



up at residents' meetings for shared-ownership buildings.

6. In the Basque Country, a high number of complaints come through the consumer bodies of local municipalities (OMIC-KIUB) or the Kontsumobide (the Basque Government's consumer body).

7. Against this backdrop, every new judicial finding on financial matters is featured in the press, often with partial information on the rulings and slanted against financial institutions.

**At the investee companies** it is also essential to monitor certain core variables of product and service quality.

The lines of action in these companies are clear: top priority must be given to food safety and occupational health and safety, followed by the strengthening of medium- and long-term strategies to maintain sustainable commercial and economic competitiveness, and to the long-term growth of the company's equity value.

In the cereal sector, food safety is based on comprehensive process of control, collection and analysis of quality metrics, staff training and, of course, having insurance to reassure our customers in the event of any incident.

The search for excellence in food safety has become the focus of action - both in terms of investments and procedures - in recent years. Beyond obtaining the appropriate approvals from the OCAs (authorised quality control bodies) and industrial customers, we are aware that our product is a food or a food ingredient, and that without extreme care in this aspect, efficiency and productivity are meaningless. The plant is IFS certified. In the Management Committees and regular meetings with Caja Rural managers,

the main quality or safety incidents that arise each month are reviewed. The implementation of "lean manufacturing" methodologies and the involvement of the staff in them has been an important driver of improvement in this aspect. Incidents are grouped by type and their severity is rated, so progress on improvements can be quantified by measuring these variables. Defects in raw materials are analysed in the same way. Each incident is assigned a person in charge, an alert date and a resolution date, as well as, if applicable, a conclusion from the customer regarding the event and its resolution. In these aspects, we are grateful for the demands of certain industrial customers who push us to constantly improve and maintain our commitment in this area.

In Solera Asistencial's residential homes, day centres and home care service, we have defined care quality metrics to determine if we are meeting our targets and the satisfaction of residents and families. These metrics cover all kinds of points:

- Global satisfaction survey
- Response time in resolving complaints
- Aspects related to cleaning, laundry, food, diet, time to book someone in, etc.
- Healthcare, administration of medicines, punctuality in treatment, etc.
- Leisure activities
- Physiotherapy activities, cognitive stimulation, etc.
- Staff training, absenteeism.
- Metrics relating to the maintenance of facilities.

Annual targets are set for these indicators and performance is reviewed on a monthly and annual basis. We work with a quality model based on the UNE 158101 (Services for the Promotion of Personal Autonomy) and ISO 9001 standards, adapted to our needs and services. The system is built into all areas of the organization and, in particular, into the care model and the Acción Social department.

## METRICS AND TARGETS

### S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Caja Rural de Navarra recognises the importance of managing customer relations responsibly, addressing possible negative impacts, promoting positive results and managing the risks and opportunities arising from this interaction. The main goals are detailed below:



### 1. Targets related to managing material negative customer impacts:

- **Reduction of claims and complaints:** target annual percentage reduction in the total number of claims and complaints received, improving the processes for customer service, conflict resolution, information transparency and root cause analysis.
- **Improving incident response and resolution times:** specific targets to reduce average response and resolution times by streamlining workflows, training staff, implementing management tools and establishing escalation protocols.
- **Preventing financial exclusion:** goals to ensure accessibility to products and services for vulnerable groups, developing inclusive products, offering accessible channels, collaborating with other organizations and promoting financial education.

### 2. Targets related to advancing material positive customer impacts:

- **Increase in customer satisfaction:** target of increasing satisfaction rates, improving the quality of products/services, personalization in customer service, anticipating needs and promoting transparency.
- **Promotion of sustainable products and services:** targets to increase supply and uptake of products with social benefits, developing social products, communicating and offering incentives.
- **Fostering financial inclusion and local development:** targets to support initiatives through customers, developing specific credit lines, collaborating with local companies and offering support programmes.

### 3. Targets related to managing material customer risks and opportunities:

- **Strengthening data protection and cybersecurity for customers:** targets to improve data security and prevent incidents by implementing advanced measures, conducting audits, staff and customer training, and regulatory compliance.
- **Risk management related to product suitability and transparency:** targets to ensure product suitability and information clarity by strengthening assessment processes, improving information clarity and training commercial staff.
- **Seizing opportunities for customer-centric innovation:** targets to develop new products/services that respond to needs and leverage digital transformation and sustainability, fostering internal innovation and collaboration with fintechs, conducting market research and investing in technology.

For each target, specific KPIs, actions, timelines and quantified goals are detailed wherever possible.





# 04/

## Governance

ESRS G1. Business conduct

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## ESRS G1 Business conduct

Caja Rural de Navarra Group promotes and has always promoted a corporate culture based on zero tolerance of behaviour that is illegal, prohibited or contrary to good banking practices, and the prevention of money laundering and terrorist financing, in line with the framework of the Group's commitment to promoting an ethical corporate culture of compliance and encouraging responsible behaviour in the Bank.

### ESRS G1-1: BUSINESS CONDUCT

**[DP 7]** The Governing Board of Caja Rural de Navarra is responsible for defining its corporate principles and values, which are set out in the Bank's various internal rules and procedures of conduct, such as: (i) the Code of Conduct and other rules of conduct and (ii) the Criminal Risk Prevention Model (CCMS - Criminal Compliance Management System).

### Code of Conduct and other rules of conduct

As we assume all the companies, organizations and individuals that make up Caja Rural de Navarra Group must always behave in a way consistent with ethical concepts, it is logical to lay out how they should be applied to our specific circumstances in a Code of Conduct that serves as a useful reference for the actions of the Group's managers and professionals.

The main aim of the Code of Conduct of Caja Rural de Navarra is to inspire trust among customers and society in general, establishing the duty of managers and employees to tailor their actions to ethical principles and behaviour. In this way, the Code of Conduct implies a commitment by the Bank to all its stakeholders: customers, employees, suppliers, business partners, supervisors and society in general. It also contributes to shaping the ethical conduct of employees and has a dissuasive effect against any deviations from it. Finally, it also contributes to the Group's transparency.

Caja Rural de Navarra has an Ethics and Conduct Committee, made up of Management and the Regulatory Compliance Department. The Committee's functions are as follows:

- To promote the dissemination and knowledge of and compliance with the regulations and the Code of Conduct for managers and professionals.
- To interpret the Code of Conduct for managers and professionals and guide actions in case of doubt.
- To receive, filter and classify complaints received through the Enquiries and Complaints Channel.

The Ethics and Conduct Committee is governed by the Criminal Compliance Unit regulations, which set the ground rules for its work in overseeing the functioning of the CCMS and the management of communications received through the Group's Ethics Channel.

These rules of conduct are developed and complemented by other internal provisions and procedures such as the Principles of Action established by Caja Rural de Navarra for the Prevention of Criminal Risks, as we shall see below.

### Criminal Compliance Management System (CCMS)

In 2016, the Governing Board of Caja Rural de Navarra approved its first Criminal Risk Prevention Model, applicable to both the Caja and its controlled entities, which included all the requirements that article 31a of the Criminal Code imposes on models established by legal entities for the prevention of crimes and the reduction of the risk of crime.

This Model was transformed into a Criminal Compliance Management System (CCMS), adapted to meet the UNE 19601 Standard, which includes procedures, policies and measures to assess the Group's criminal risk and to prevent, detect and manage it at an early stage.

This Criminal Compliance Management System has its corresponding handbook (the Criminal Compliance Management System Handbook), which establishes the system of compliance, organization, prevention, management and control of criminal risks of the Bank and the subsidiaries of the Savings Bank in relation to the criminal liability regime for legal persons established in Organic Law 10/1995, of 23 November, of the Criminal Code, as amended by Organic Law 5/2010 of 22 June, by Organic Law 1/2015 of 30 March, by Organic Law 1/2019 of 20 February, by Organic Law 10/2022 of 6 September, by Organic Law 14/2022 of 22 December and by Organic Law 3/2023 of 28 March, which amended Organic Law 10/1995 of 23 November of the Criminal Code.

The ultimate objectives of this handbook are: to ensure the effectiveness of control rules and procedures that minimise the Group's risk of unlawful conduct by its employees, and to demonstrate that due control has been exercised over its activities, thereby complying with the requirement set out in the Criminal Code.

**[DP 9]** We mention below some of the tasks that Caja Rural de Navarra has carried out to ensure the effective implementation of the System of compliance, organization, prevention, management and control of criminal risks:

- It has established a management model with sufficient financial, technological and human resources to prevent the commission of applicable offences, such as the implementation of the Motor de Cumplimiento application and the creation of the Technical Unit for Criminal Compliance.
- It has appointed a Criminal Compliance Unit, charged with managing and monitoring of the CCMS;
- It has included the CCMS in the internal audit processes;
- It has implemented a training and awareness-raising plan for employees on criminal compliance.
- It has confirmed there is a whistleblowing process for the notification of possible breaches or violations of rules of conduct, which enables the Bank to be aware of and react to possible unlawful situations, known as the Ethics Channel. This channel allows the Group to be informed of any irregular or unlawful conduct committed within the Group; (a) that could constitute offences under the Criminal Code; (b) violations of the Code of Conduct for managers and employees. This channel is also medium where any user and consult the Criminal Compliance Unit and obtain from it the necessary advice on matters relating to certain conduct, activities or criminal risks that could arise within the Group.

(vi) It has chosen to apply, in the event of non-compliance with the obligations contained in the PCMS Manual, the disciplinary and sanctioning regime in force, as set out in the Spanish Labour Code and in the applicable Collective Bargaining Agreement.

Both the CCMS and its handbook apply to directors, managers and employees, as well as to all persons who provide services to the Group or who may act under the Group's authority. Therefore, all persons who make up the Group's staff are obliged to know and comply with the regulations in force that affect their professional activity at all times in the Group, especially the rules set out in the Group's Criminal Compliance Management System, in order to prevent and detect the possible commission of a crime.

The Criminal Compliance Management System is based on a Criminal Compliance Policy, the principles of which are available to the public and other stakeholders on the Caja's website and which also applies to its controlled subsidiaries, Informes y Gestiones Generales S.A. and Promoción Estable del Norte S.A., which carry out activities complementary to those of Caja Rural de Navarra, as well as Explotación Agrícola Las Limas, S.L. and Espiga I&D Alimentaria, S.L., as they are supported by the Social Welfare Fund.

Finally, it should be noted that the Bank is confident it has a robust and efficient Criminal Compliance Management Systems. Since 18 May 2021, it has been certified by AENOR with a Certificate that accredits the Bank's compliance with UNE 19601:2017. This Certificate is renewed each year.

**[DP 10]** In line with all of the above and in addition to the tools already mentioned, the Bank has various Codes, Policies and Procedures that form

part of the Group's Criminal Compliance and Conduct environment, such as:

- Criminal Compliance Policy.
- Internal Rules of Conduct for Capital Markets Personnel ("IRC").
- Diagnosis of criminal offences and tips on how to avoid them.
- Internal Information System (IIS) that incorporates the Ethics Channel.
- Irregularity Reporting and Whistleblower Protection Policy.
- Regulations of the Governing Board: Document adapted to the model drawn up by the National Securities Market Commission and to the recommendations of the European Banking Authority ("EBA"), which establishes the appropriate standards of action in matters of corporate governance of the Governing Board.
- Handbook on the Prevention of Money Laundering and Terrorist Financing.
- The Bank's Conflict of Interest Policy

## Criminal Compliance Policy

The purpose of Caja Rural de Navarra's Criminal Compliance Policy is:

- To transmit to the Group's stakeholders respect for the laws and regulations in force,
- To establish and defend the Group's fundamental values and principles of action,

- To define a Code of Conduct,

- To establish an CCMS for the Group and adapt it to the new regulatory provisions and the requirements of the UNE 19601 standard

- To comply with the duties of supervision and control of its activity, establishing appropriate measures to mitigate the risk of crimes being committed.

This Policy has been communicated to the staff of the Bank and is accessible to stakeholders through the relevant channels.

In addition, a training document called Business Principles for the Prevention of Criminal Risks, annexed to the Criminal Compliance Policy, has been drawn up and approved by the Criminal Compliance Unit, in which various actions to be avoided in order to avoid the risk of committing unlawful acts are explained to employees in a straightforward manner.

## Anti-Corruption and Bribery Policy

The policy to prevent corruption and bribery is based in particular on the Caja Rural Code of Conduct, which applies to all Caja Rural employees and managers of its subsidiaries.

In accordance with the Code of Conduct, Caja Rural de Navarra Group is committed to combatting corruption in any form, including extortion and bribery. This policy is an integral part of the crime prevention programme implemented in the organization, as it serves as a guide to best practice and prohibited conduct to prevent either the Bank or its staff from being exposed to practices that could result in or be perceived as corruption.

The Internal Audit Department has, among other functions, a commitment to ensure compliance with our Codes of Conduct, and will seek to detect unethical behaviour.

## The Bank's Conflict of Interest Policy

Caja Rural de Navarra's Governing Board is obliged to define a system for corporate governance that guarantees sound and prudent management of the Bank and, among other matters, addresses the issue of conflicts of interest. Caja Rural de Navarra has put in place a series of measures to identify those types of conflict of interest that could potentially arise in the course of its relationships and put in place procedures to manage them and ensure business is conducted independently and without harming the interests of the customers or the Group itself.

To this end, the Bank has a Policy on the Management of Conflicts of Interest approved by the Governing Board. The Policy provides for a register of all different types of conflict that could seriously damage the interests of one or more customers and which have arisen or may arise in relation to regulated services or business activities.

The register also identifies and documents conflicts of interest related to the structure and sales practices that may arise due to the different services and transactions that the Bank engages in. The organizational and functional structure of the Group provides appropriate segregation of functions which allows it to conduct activities that could potentially give rise to conflicts of interest, by persons or segregated areas, while avoiding undue interference.

## Internal Reporting System (IRS)

In accordance with Law 2/2023 of 20 February, the ultimate purpose of which is to provide adequate protection against retaliation by natural persons who report any of the actions or omissions referred to therein, the Group has made the relevant efforts, actions and adaptations during 2023 to establish an Internal Reporting System (IRS) and internal channels for the communication of information.

With regard to the IRS, the Bank has designed and implemented the role of Head of IRS, which can be a natural person of managerial rank or a collegiate body appointed by the Governing Board. The IRS is established by the following documents approved by the Governing Board: 1. on Whistleblowing and Whistleblower Protection Policy, 2. General Procedures of the Internal Reporting System.

In addition, the IRS draws on various processes developed within the Bank in the Regulatory Compliance Framework, notably the CCMS:

- 1/ Identification, assessment and handling of risks arising from non-compliance with Law 2/2023 and the Whistleblowing and Whistleblower Protection Policy, a process integrated into the Group's risk analysis framework, through the application of the Regulatory Compliance Risk Analysis Methodology..
- 2/ Clear allocation of roles and responsibilities across all lines of the Group.
- 3/ Maintenance of existing internal reporting channels appropriate to the Group's risk profile.

- 4/ Implementation of communication campaigns, included in the Communication Plan of the CCMS.
- 5/ Implementation of measures to protect whistleblowers and other users of the IRS.
- 6/ Implementation of processes to correct irregularities detected through the IRS and remedy any harms caused.
- 7/ Implementation of internal and external due diligence measures for positions and relationships with higher than low risk.
- 8/ Training and awareness-raising actions in the appropriate training and awareness plans to ensure that Group employees and other users of internal channels are aware of and use the IRS.
- 9/ Maintaining adequate internal and external lines of communication to ensure the effectiveness of the IRS.
- 10/ Conducting the internal audits in the Audit Plans and managing corrective actions and continuous improvement, in accordance with the process defined in the CCMS.
- 11/ Collect and store evidence on the IRS's effectiveness, by applying the procedure for the creation of new procedures and using the 360 Compliance Engine.
- 12/ Reporting in accordance with the review process defined in the CCMS.

## Whistleblowing and Whistleblower Protection Policy

Closely linked to the Internal Reporting System, Caja Rural de Navarra has developed and implemented the Whistleblowing and Whistleblower Protection Policy, approved by the Group's Governing Board. The purpose of this policy is to import the fundamental principles of Law 2/2023 into the Bank's internal regulations. These must inspire all actions aimed at protecting people who report breaches of the Regulations which may be communicated.

This Policy sets out the scope and general procedure of the Group's Internal Reporting System in accordance with the provisions of Law 2/2023.

In particular, the Whistleblowing and Whistleblower Protection Policy has been developed in order to:



- Establish a mandatory IRS for all members of the Group: Governing Board, General Management, Management Committee, employees, as well as other stakeholders and business partners related to the Bank.
- Provide the Bank with effective internal communication channels for individuals to report irregularities or breaches, as well as procedures that guarantee the anonymity of informants or safeguard their identity, avoiding any kind of reprisals.
- Assure stakeholders, whistleblowers, partners, customers, suppliers, administrative and judicial bodies and society in general, that the Bank complies with the duties established by whistleblower protection legislation, and has communication channels and effective measures in place to mitigate the risk of non-compliance with its obligations.

In line with the aims of the Whistleblowing and Whistleblower Protection Policy, Caja Rural de Navarra applies the necessary measures and controls to guarantee that information received through the whistleblowing channels is subject to confidentiality in accordance with Law 2/2023 article 9.2 g), through the internal procedure established for this purpose, and that any type of full or partial public disclosure affecting the Bank will automatically trigger a preliminary investigation procedure.

Consequently, the Head of IRS and, where appropriate, the managers of the internal reporting channels, are responsible for ensuring that all communications, information, enquiries or complaints received are analysed independently and confidentially, as well as for guaranteeing the confidentiality of the identity of the person submitting the information and of the person(s)

being reported on, informing only those persons strictly necessary in the process.

In addition, regarding the confidentiality and protection of informants, the aforementioned Policy establishes, among other things, the following:

- Prohibition of reprisals, including threats of reprisals and attempts at reprisals, and protection of whistleblowers and users of internal channels
- Prohibition of acts intended to prevent or impede the submission of communications and disclosures, as well as acts that constitute retaliation or cause discrimination following the submission of such communications or complaints.

In addition, the Head of the Internal Reporting System may develop instructions establishing interpretative criteria or guidelines on conduct that might be considered retaliatory.

Protection of users of communication channels and whistleblowers shall apply from the moment of initial triage and admission of their communication and be governed by the following criteria:

- a/ The Head of IRS and channel managers shall ensure constant and fluid communication with the informant or user of the communication channel such that they will know at all times whether he/she has suffered any type of reprisal or consequence after having made the report.
- b/ They shall be offered support and advice on the consequences of their report, in particular by being informed about the protection offered by the competent Whistleblower

Protection Authorities and about external reporting channels.

In addition, in the managing communications the rights of the person who is the object of the report must be safeguarded at all times, especially their rights:

- a/ to be informed of the acts or omissions attributed to him or her,
- b/ to be heard at any time,
- c/ to have his or her presumption of innocence and right to honour respected. The person concerned shall be informed in the time and manner deemed most appropriate to ensure the successful outcome of the investigation. All applicable provisions on the protection of personal data under Title VI of Law 2/2023 on data protection and guarantee of digital rights and the GDPR shall be respected.

In accordance with the above, the Whistleblowing and Whistleblower Protection Policy applies to anyone in the Group who reports any action or omission, i.e. to all potential users of the Internal Reporting System: Directors, managers, partners and employees of the investees and third parties who have a contractual or commercial relationship with the investees.

## Internal Reporting Channels

In accordance with the Whistleblowing and Whistleblower Protection Policy, Caja Rural de Navarra has set up the following Internal Reporting Channels for the reception and management of communications:

- The Ethics Channel, which can be accessed through the corporate website (corporate

information - Ethics Channel) and the Employee Portal (Fénix), which allows communications to be submitted, even anonymously, in writing or by means of audio recordings that will be transcribed into text in order to prevent voice identification.

- Personal interviews, held within seven days of the reporting person requesting one by email to the Criminal Compliance Technical Unit, as a support body to the Criminal Compliance Unit, at: [cumplimentopenal.unidadtecnica@crnavarra.com](mailto:cumplimentopenal.unidadtecnica@crnavarra.com)
- Information received through other communication channels, guaranteeing confidentiality in accordance with Law 2/2023.
- Any public disclosure affecting the Group automatically triggers a preliminary investigation procedure.

In addition to the Internal Reporting Channels above, the whistleblower may report directly to the Independent Authority for the Protection of Whistleblowers (the AAI) or to the corresponding regional authorities or bodies, any actions or omissions that fall within the scope of Law 2/2023, either directly or following communication through the Internal Channels indicated above.

## Ethics Channel

In addition to the above, the Group's Ethics Channel has been set up as the main channel through which employees of the Bank and third parties related to the Group can report to the Group any actions or omissions that could constitute criminal or administrative offences or infringements of the Bank's internal regulations under the Code of Conduct for managers and professionals, the Conflict of Interest Policy, or even irregularities



committed in the process of issuing financial and accounting information.

For the management and processing of communications received through the Ethics Channel, the Bank has created the role of Channel Managers, structured into the following units:

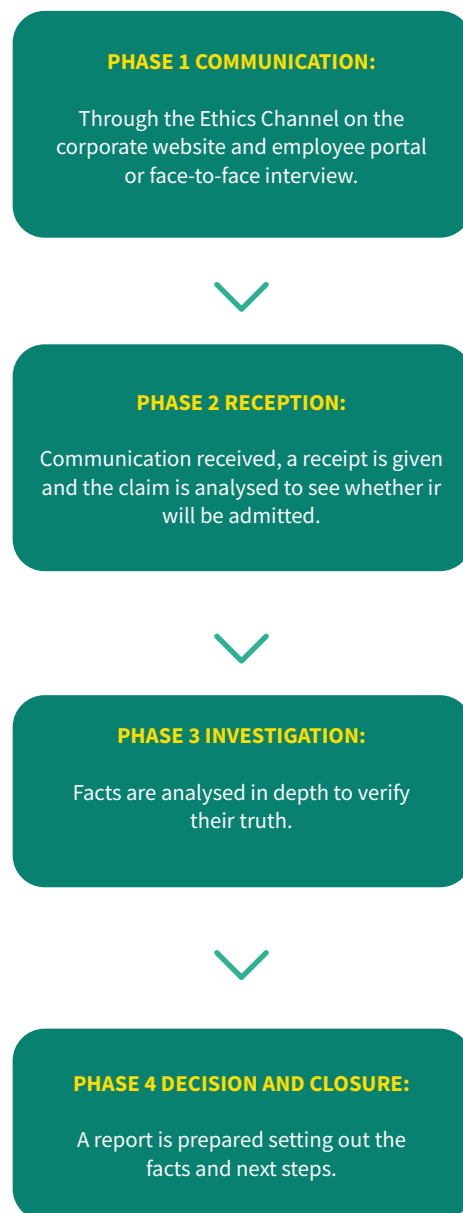
→ The Criminal Compliance Body via its Technical Unit for Criminal Compliance: this is generally the Channel Manager for all communications except those expressly assigned to the different managers in the cases indicated below.

→ Management of the People Internal Area: Channel Manager for all communications related to workplace, sexual and gender-based harassment.

→ Internal Control via its Money Laundering Prevention Service: Channel Manager for all communications related to money laundering and terrorist financing.

→ Management of the Regulatory Compliance Area: Channel Manager for all communications related to breaches of the Group's Internal Governance System, as well as any conflicts of interest that may arise.

The different phases of the process of managing information and communications received through the Ethics Channel and other internal channels are shown below:



Note that in those cases in which the Reporting Person detects a possible conflict of interest with the Channel Manager who is going to receive and/or investigate the communication, or in which the Channel Manager identifies the existence of a possible conflict of interest at the reception stage, the communications shall be managed directly by the Head of the Regulatory Compliance Area. This shall entail the separation of the person in whom the possible conflict of interest arises from the processing of the file originated by the communication, in the phase of the same in which that person intervenes. In the case of communications relating to workplace, sexual or gender-based harassment, the conflict of interest shall be managed in accordance with the provisions of the Protocol for the Prevention of Workplace, Sexual or Gender-Based Harassment.

This Channel comes under the framework of the Criminal Compliance Management System (CCMS) which conforms to the UNE 19601 Standard and is certified by the certification body AENOR.

Caja Rural de Navarra also has other internal channels or procedures for its own purposes, such as for situations of harassment in the workplace or sexual harassment, Prevention of Money Laundering or the Customer Service Department. In all circumstances, the reporting of conduct that could constitute workplace, sexual or gender-based harassment must go through the Group's Ethics Channel and be handled in accordance with the provisions of this Procedure and the Protocol for the Prevention of Workplace, Sexual and Gender-Based Harassment.

With regard to training in business conduct, Caja Rural de Navarra Group has defined and deployed various training procedures and programmes for all members of the Group (i.e. Governing Board, General Management, Management Committee, employees, stakeholders and business partners),

in order to guarantee their ethical conduct and behaviour and thus achieve the best outcome for the Group, the customer and all relevant stakeholders.

To this end, Caja Rural de Navarra Group carries out different actions:

- Training and awareness actions included in the appropriate training and awareness plans to ensure that Group staff and other users of internal channels are aware of and use the IRS.
- A training and awareness-raising plan on criminal compliance has been implemented for employees. The training contains a description of the control framework, where the Criminal Compliance Policy and the implemented CCMS are described and the applicable regulations on criminal matters detailed, plus an analysis of the main risks they may encounter in the course of their work, how they can help prevent and detect risks, and the related general and specific controls applied.
- An annual training programme has been established for the Management Committee and other particularly exposed personnel on the Group's control environment with a particular focus on training in criminal compliance.

The Bank also runs a Group training programme for managers and employees, which includes various courses:

- **Members of the Governing Body:** the members of the Governing Body take a specific classroom training course every three years, which takes into account the level of responsibility of the recipients. A certificate is issued on completion and filed by the Criminal Compliance Technical Unit.



→ **Newly hired employees:** new hires have their own training pathway and must take a mandatory e-learning training course within the first month from the date of incorporation. The programme includes a specific course on the prevention of money laundering.

→ A refresher training course, also using e-learning methodology, is planned:

a) At least every 5 years.

b) When new legislation or relevant changes in the Group's internal procedures so recommend.

It is also worth mentioning that the Bank has a Register of Particularly Exposed Persons (PEE), which lists those employees of the Group who occupy positions that are particularly exposed to criminal risks, including the risk of corruption and bribery.

Employees in these particularly exposed positions must take a one-hour on-site training course during the last quarter of each year. At the end of the session, a test is carried out which is kept on record by the Criminal Compliance Technical Unit

## GOVERNANCE

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

**[DP 5]** In the context of the Bank's organization, leadership in relation to the Criminal Compliance Management System (CCMS) is exercised by the Governing Body, Senior Management and the Criminal Compliance Unit.

In the Bank, the Governing Board is considered to be the Governing Body, which, in certain cases, delegates part of its functions to the Audit Committee.

The functions, composition and structure of the Governing Board, the status of its members and the functioning and composition of its Committees are set out in the Group's corporate Rules, essentially in the Articles of Association and Governing Board Rules of Procedure.

The Rules define the principles of action of the Governing Board and the basic rules for its functioning and codes of conduct for its members and those of its Committees. The Rules also define the duties of diligence and loyalty for directors and the associated rules on non-competition, disclosure, recusal in the event of conflict of interest and the ban on using corporate assets or exploiting business opportunities arising in the course of the Bank's or CRN Group's business for their own benefit.

The Governing Body has the following functions in relation to the CCMS:

- To establish and defend as one of the Bank's fundamental values that the actions of all members of the organization must always comply with the legal system in general and with criminal law in particular, promoting an appropriate culture of compliance.
- To adopt, implement, maintain and continually improve the appropriate CCMS to detect, prevent or reduce the risk of crime in the Bank.
- To provide the CCMS, and in particular the Criminal Compliance Unit, with appropriate and sufficient financial, material and human resources for its effective functioning.

→ To approve the Group's Criminal Compliance Policy.

→ To periodically review the effectiveness of the CCMS, modifying it if necessary, when serious breaches are detected or when there are changes in the Group, its control structure or its activities.

→ To establish a Criminal Compliance Unit responsible for supervising the functioning and implementation of the CCMS, granting it autonomous powers of initiative and control so that it can carry out its work effectively.

→ To ensure that appropriate procedures are in place to guarantee the Group can express its will, make decisions and execute its decisions effectively by promoting a culture of compliance that ensures high ethical standards of behaviour.

For its part, senior management is entrusted with the following functions in relation to the CCMS:

- To ensure that the CCMS is properly implemented to achieve the goals set out in the Criminal Compliance Policy, to approve the goals of the CCMS and to effectively address the Group's criminal risks.
- To ensure that the requirements flowing from the CCMS are incorporated into the Group's operational processes and procedures.
- Ensure the availability of adequate and sufficient resources for the effective implementation of the PCMS.
- To comply with and enforce the Criminal Compliance Policy, both internally and externally.

→ To lead and support staff to comply with and make effective the CCMS in accordance with their role in the Group.

→ To promote continuous improvement and support the various management roles to demonstrate leadership in crime prevention and criminal risk detection as appropriate to their areas of responsibility.

→ To encourage the use of the Ethics Channel for the reporting of potentially criminal conduct that may affect the Bank and its activities.

→ To ensure that no member of the organization is subject to retaliation, discrimination or disciplinary sanction for reporting in good faith breaches or substantiated suspicions of breaches of the Criminal Compliance Policy or for refusing to participate in criminal conduct, even if this leads to a loss of Group business.

In addition, as representatives of the Group, management has a responsibility to lead by example. They must be role models to inspire others to follow the Group's Code of Conduct and their actions must be guided by the highest standards of ethical and professional behaviour.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### IRO-1: Description of the process to identify and assess material IROs

**[DP 6]** Caja Rural Group of Navarra took into account the following key factors when identifying

material impacts, risks and opportunities in the field of Governance.

→ **Location**

Caja Rural de Navarra Group operates in Spain. This is important to bear in mind as internal and external governance systems may vary depending on the location of the company's activity and of the physical assets where the Group operates, giving rise to different impacts, risks and opportunities.

→ **Business activity**

The business the Group is in is another factor analysed when identifying material impacts, risks and opportunities in the field of governance. Caja Rural de Navarra Group's current business lines have been analysed, in order to understand the governance implications of each.

→ **Sector**

The sector has also been taken into account to identify material issues, risks and opportunities in the field of governance.

→ **Organizational structure**

Structure is in itself a key factor in identifying impacts, risks and opportunities. In fact, it is from the governance model of Caja Rural de Navarra Group and its own organizational structure that the greatest number of impacts, risks and opportunities can be extracted and identified.

## COMBATING CORRUPTION AND BRIBERY

### ESRS G1-3 and G1-4: Prevention and detection of corruption and bribery

Caja Rural de Navarra Group is classed as a Credit Institution and so comes under the supervision of a number of regulatory bodies. These include, most notably, the Bank of Spain and the European Central Bank (ECB) in prudential matters as a Credit Institution of the European Union, the National Securities Market Commission (CNMV), with regard to the provision of investment services, and the Executive Service for the Prevention of Money Laundering ("SEPBLAC") as a regulated financial institution, subject to the strict rules of conduct and organization established by the regulations of its sector. As a result, the Bank has numerous controls in place, required both by its supervisors and by specific sector regulations, to prevent fraudulent transactions.

First, Caja Rural de Navarra Group maintains a corporate culture based on zero tolerance of behaviour that is illegal, prohibited or contrary to good banking practices, and the prevention of money laundering and terrorist financing, in line with the Bank's commitment to promoting an ethical corporate culture of compliance and encouraging responsible behaviour in the Bank.

As mentioned above, this corporate culture of Caja Rural de Navarra Group is governed by two pillars: (i) the Code of Conduct and other rules of conduct and (ii) the Criminal Risk Prevention Model (CCMS - Criminal Compliance Management System).



In accordance with the provisions of the Code of Conduct, Caja Rural de Navarra Group is committed to the fight against corruption in any form, including extortion and bribery.

The standards set out in the Code of Conduct are further developed and complemented by other internal provisions and procedures such as the Action principles established by the Bank for the Prevention of Criminal Risks.

The Code is communicated to all Caja Rural de Navarra employees. Its latest version is dated February 2023 and is available from the Documentation Centre (Caja Rural de Navarra Intranet). At the subsidiaries, the management teams are familiar with the Caja Rural de Navarra Ethics Code and obliged to comply with it.

With regard to anti-corruption, the purpose of Caja Rural de Navarra's Criminal Compliance Management System is to identify which of the Group's activities could be vulnerable to crimes being committed and to establish the appropriate controls and procedures to prevent them.

Accordingly, the system puts in place measures to mitigate any risk of conduct that constitutes a criminal offence, including corruption between private individuals, bribery, influence peddling and corruption in international business transactions. All the information on risks and controls associated with the Criminal Compliance Management System (CCMS) is collected in an application called Motor de Cumplimiento.

The Criminal Compliance Management System is familiar to all Group employees.

This system has a manual, the Criminal Compliance Management System Handbook, which lays out the system of compliance, organization, prevention, management and control of criminal risks at the

Bank and its subsidiaries, in light of the system of criminal liability of legal persons established by Organic Law 10/1995 of 23 November on the Criminal Code, as amended by Organic Law 5/2010 of 22 June, by Organic Law 1/2015 of 30 March, by Organic Law 1/2019 of 20 February, by Organic Law 10/2022 of 6 September, by Organic Law 14/2022 of 22 December and by Organic Law 3/2023 of 28 March.

The CCMS Handbook prescribes three basic lines of defence in the Bank that guarantee the supervision, monitoring and control of its activities: (a) a first line formed by the different Heads of the Areas of Activity; (b) a second line formed by the Regulatory Compliance Department and the Internal Control Department and; (c) a third line formed by the Internal Audit Department.

In addition, the Bank has a number of other specific control bodies required by the regulations governing Credit Institutions, including:

- Pursuant to Law 10/2014 of 26 June 2014 on the regulation, supervision and solvency of credit institutions: Audit Committee, Risk Committee, Appointments Committee and Remuneration Committee.
- Pursuant to Law 10/2010, of 28 April, on the prevention of money laundering and terrorist financing and its implementing regulations: the Internal Control Body (ICB) for the Prevention of Money Laundering;
- Pursuant to securities market regulations: the Internal Control and Monitoring Body of the Internal Code of Conduct;
- Product Committee
- Cost Control
- Operational Risk Committee.

Specific controls to prevent private-to-private corruption include:

- Internal procedures for contracting and making payments to suppliers.
- Procedure for making payments.
- Procedure for the review and approval of employee expenses.
- Policy on accepting/offering gifts and benefits.
- Remuneration policy.
- Policy on the delegation of essential services or functions.

Specific controls to prevent bribery, influence peddling and corruption in international business transactions include:

- Different levels of powers of attorney to conduct transactions on behalf of the Group.
- Internal procedures for contracting and making payments to suppliers.

The CCMS Handbook also identifies which offences the Bank could be exposed to, based on the activities it carries out, as follows:

Delito	Caja
Organ trafficking	x
People smuggling	x
Prostitution and corruption of minors	x
Crimes against personal and family privacy	✓
Fraud	✓
Fraudulent bankruptcy and frustration of creditors	✓
Computer damage	✓
Intellectual and industrial property	✓
Corporate secrecy	✓
Price manipulation (raw materials)	x
Misleading advertising	✓
Fraudulent invoicing	x
Financial market crimes	✓
Piracy of broadcasting services	x
Private-to-private corruption	✓
Money laundering and terrorist financing	✓
Illegal political party financing	✓

Delito	Caja
Tax evasion	✓
Smuggling	x
EU budget fraud	✓
Social Security fraud	✓
Subsidy fraud	✓
Non-compliance with accounting obligations	✓
Breach of the rights of foreign nationals	x
Breach of planning laws	x
Crimes against natural resources and the environment	✓
Relating to nuclear energy and ionising radiation	x
Against public health	x
Counterfeiting of credit cards, debit cards and traveller's cheques	✓
Bribery/Influence peddling	✓
Corruption in international business transactions	✓
Counterfeiting	✓
Embezzlement	✓

Similarly, criminal compliance and the implementation of the control measures set out in the Criminal Compliance Management System Handbook must be accompanied by adequate dissemination and proper explanation to employees.

In addition, the Bank has a Code of Conduct and a Criminal Compliance Policy which establishes and develops the following matters:

- Receipt of gifts or commissions: in relations with the Bank's customers, no member of staff may accept commissions or gifts that exceed social customs or hospitality of any kind that may affect or condition their decisions.
- Public authorities and officials: the Criminal Code prohibits the offering or giving of a gift or any other kind of consideration to an authority, public official or person involved in the exercise of a public function to perform an act contrary to the duties inherent to their position or an act proper to their position, to not perform or delay an act that they should perform, or in consideration of their position or function.

Likewise, Caja Rural de Navarra is not authorised to make donations or debt cancellations to political parties of any kind and does not take any position on any ideological or partisan affiliation. Any participation by its employees or collaborators in public or political activities will be exclusively on a personal level and never on behalf and/or in representation of the Group.

- Relations with suppliers: Caja Rural de Navarra has established an approval manual for the selection of suppliers with the aim of ensuring that suppliers adhere to the values and principles in its Code of Ethics.
- Relationships with third-party collaborators: for the purposes of these relationships, the Criminal Compliance Management System requires that the Bank conduct supervision and assessment of the entities or business partners with which maintains commercial relationships in order to determine the possible risk of corruption associated with them.
- Conflicts of interest: the contractual duty of loyalty of Group members to the Bank is expressly stated, and such situations should therefore be avoided.
- Action in cases of corruption or bribery: in the event that Caja Rural de Navarra employees detect any infringement in this respect or perceive that an action could be considered a corrupt practice, they must immediately inform the Compliance Officer, using the Ethics Channel set up by Caja Rural de Navarra.

Furthermore, to make it easier for employees to be aware of which conduct that could be classified as a criminal offence, the Bank has prepared a document on "Business Principles for the Prevention of Criminal Risks".

The Business Principles are as follows:

- 1. We are committed to respecting the personal and family privacy of all individuals who interact with the Bank.**
- 2. We are committed to applying principles of honesty and transparency in our dealings with third parties.**
- 3. We are committed to the responsible use of information technologies.**
- 4. We are committed to respecting intellectual and industrial property rights.**
- 5. We are committed to the confidentiality of third-party information to which we have access.**
- 6. We are committed to proper conduct on the securities markets.**
- 7. We are committed to freedom of competition in the private sector.**
- 8. We are committed to the prevention of money laundering and terrorist financing and against the illegal financing of political parties.**
- 9. We are committed to the lawful use of our customers' credit cards, debit cards and travellers' cheques and to the prevention of currency counterfeiting.**
- 10. We are committed to transparency in our relations with public authorities.**
- 11. We are committed to fulfilling our financial obligations to our creditors, respecting their right to have their claims met.**

- 12. We are committed to fluidity, transparency and loyalty in the Bank's relationship with the tax and social security authorities.**
- 13. We are committed to the lawful collection and use of public funds and the honest administration of public funds.**
- 14. We are committed to complying with all legal requirements in environmental matters**

private sector, the following conduct, among others, is prohibited:

- Offering managers, administrators, employees or collaborators of the companies with which the Bank has a relationship a benefit or advantage of any kind that is not justified in order to grant the Bank favourable treatment, in breach of its own internal procedures or its obligations in the contracting of professional services.
- Receiving or soliciting an unjustified benefit or advantage of any kind from third-party companies or suppliers in return for favouring those companies or suppliers over third parties (e.g. by contracting their services).
- Accepting any kind of gift, present, income or commission that exceeds social customs, arising from transactions carried out by the Bank. This prohibition applies to relations with other employees, customers, suppliers, counterparties, intermediaries or any other third party with whom a relationship is maintained



It is strongly emphasised that the Group's compliance with, and adherence to, the above-mentioned principles of conduct is essential to prevent any criminal misconduct.

Caja Rural de Navarra's internal audit department verifies compliance with the Code of Conduct in the parent company and at its subsidiaries.

### G1-3: Prevention and detection of corruption and bribery

**[DP 16, 18]** To promote and guarantee its corporate values throughout the organization and create a structured path for the resolution of ethical dilemmas that may arise, the Bank has created an Ethics Channel for employees and third parties. Both groups can use this to securely and confidentially report any potential irregularities so that they can be investigated and studied by the competent bodies, with the aim of preventing inappropriate or unauthorised actions or conduct.

All employees and the general public have access to this Ethics Channel to report any type of misconduct detected.

The Ethics Channel is therefore the system that allows any user to confidentially and, where appropriate, anonymously report to the Group:

- a) Any conduct defined as illegal in the Criminal Code and, in particular, any conduct that could give rise to criminal liability of the legal persons listed in the Bank's CCMS.
- b) Breaches of the Code of Conduct for managers and employees.
- c) Any event or circumstance that may incur a penalty or administrative sanction under the regulations in force at the time, and in particular,

any infringement of the regulations governing the prevention of money laundering and terrorist financing.

- d) Any irregularity (material error or fraud) committed in the process of issuing the Group's financial and accounting information.

Users may use the Ethics Channel to lodge complaints related to the conduct described above, or to address enquiries or suggestions to the Criminal Compliance Unit on all matters falling within its remit.

Once the Criminal Compliance Unit has received the report, it will verify that it meets the minimum requirements of the Group's Ethics Channel Regulations and, if so, will launch an investigation of the facts itself or by the corresponding department.

Once the investigation has been completed, the Channel Manager will produce a Report with the main conclusions and proposed resolution, which may be:

- a) To close the proceedings.
- b) To refer the matter to the competent internal body given the nature of the facts communicated.
- c) To refer the matter to the Public Prosecutor's Office or the European Public Prosecutor's Office, if appropriate.

In general, the competent internal decision-making body will be the Criminal Compliance Unit, except in cases where the matter being reported involves workplace, sexual or gender-based harassment, in which case the HR Department or, where appropriate, the General Management shall be competent, in accordance with the provisions

of the Protocol for the Prevention of Workplace, Sexual or Gender-Based Harassment. Similarly, if the report concerns breaches of anti-money laundering regulations, Internal Control will be responsible for this phase and the decision on next steps.

Once the final decision has been adopted and in compliance with current legislation on data protection, the file will be archived and access to it will be restricted. This process will be carried out by the Head of the IRS.

**[DP 19, 20, 21]** The following measures have been taken regarding awareness-raising and training to combat corruption and bribery, both in Caja Rural de Navarra and in its affiliated companies (Informes y Gestiones Generales, S.A., Promoción Estable del Norte S.A., Explotación Agrícola Las Limas and Espiga I&D Alimentaria S.L.):

- The Criminal Compliance Policy has been defined and approved with the aim of conveying to the Group's stakeholders respect for the laws and regulations in force. This policy has been communicated to all Bank staff and is accessible to stakeholders through the corresponding channels.
- The Business Principles for the Prevention of Criminal Risks is a training document annexed to the Criminal Compliance Policy, in which various actions to be avoided in order to avoid the risk of committing unlawful acts are explained to employees in a straightforward manner.
- A specific training programme on criminal compliance has been developed for all employees. It walks them through the control framework, describing the Criminal Compliance Policy and the CCMS, details of the applicable regulations on criminal matters, the main risks they are likely to encounter in their particular job and how they can help prevent and detect them, and the related general and specific controls. It also includes the process for reporting possible offences and instances of non-compliance with the CCMS, as well as doubts and concerns regarding criminal compliance.
- A training programme has also been established for the Management Committee on the Group's control environment and, in particular, to train them on criminal compliance.

**ANTI-CORRUPTION AND ANTI-BRIBERY TRAINING (2024)**

	Caja Rural de Navarra			Investees	Total		
	Own workforce	Of which at risk	OAMSB <sup>1</sup>	Own workers	Own workforce	Of which at risk	OAMSB <sup>2</sup>
Total number of employees trained	1303	19	0	36	1339	19	0
Total number of employees	1334	22	0	36	1370	22	0
%	97,67	86,36	0	100	97,73	86,36	0

<sup>1</sup> Órganos de administración, dirección y supervisión

<sup>2</sup> Órganos de administración, dirección y supervisión

## G1-4: Incidents of corruption or bribery

**[DP 22, 24, 26]** In the event that Caja Rural de Navarra staff detect any infringement or perceive that an action could be considered a corrupt practice, they must immediately report it to the Compliance Officer, using Caja Rural de Navarra's whistleblowing channel.

Regarding operations assessed by the Group for corruption-related risks, there were none in the financial year 2024.

No reports of corruption-related cases were received through the Ethics Channel in 2024, nor have any other corruption cases been identified in the year.

Likewise, Caja Rural de Navarra Group has no convictions or fines for breaching anti-corruption and bribery laws; nor are there any confirmed cases of corruption or bribery in the Group. At present, there are also no public legal proceedings

related to corruption or bribery brought against the company and its own workers during year or in previous years.

In 2024 Caja Rural de Navarra Group made no contributions of any kind to political parties, nor to persons with public responsibilities or related institutions, and therefore it has not been necessary to notify the Court of Auditors under the terms of article 4.2 b) of Organic Law 8/2007, of 4 July, on the financing of political parties.

## ESRS G1-5: Political influence and lobbying activities

Caja Rural de Navarra Group avoids situations in which it might exert political influence and any presence in social or political pressure groups.

First, it should be pointed out that Caja Rural de Navarra, due to its systems for electing its administrative bodies and its internal compliance with the regulatory guidelines on the banking sector,

is not likely to attract managers or administrators with an interest in lobbying. Secondly, its regional activity and its limited size would make it very difficult to exert lobbying pressure.

The codes of business conduct prohibit Caja Rural de Navarra from making donations, debt cancellations or any other type of aid to political parties.

However, Caja Rural de Navarra belongs both to the Spanish Asociación Española de Cajas Rurales, the representative body of the Caja Rural Group, and to the Unión Nacional de Cooperativas de Crédito, the trade association for credit co-operatives which acts as an umbrella body and represents most of them on certain issues. Both associations try to resolve common problems and issues, and are a forum for debate and an economic reference for small financial institutions.

Given the fact that the Unión Nacional de Cooperativas de Crédito is an interlocutor with the Administration for certain specific matters, and although its lobbying capacity is very limited, we

show below our membership fees to it in the last two financial years:

2024	2023
<b>89.342€</b>	<b>73.173€</b>

In short, no activities that could involve political influence or lobbying are carried out by the Caja Rural Group.

## ESRS G1-6: Payment practices

Caja Rural de Navarra is committed to fair and sustainable business practices, including compliance with payment terms with suppliers. The Bank applies internal procedures to ensure that payments are made in accordance with the contractually established deadlines, thus promoting responsible and stable relations with its business partners.

Each Internal Area contracts with suppliers as its needs and demands dictate.

Having each department contract its own suppliers ensures better quality control of the services provided. Each Area head has first-hand knowledge of any incidents or irregularities.

With regard to expenditure control, an annual expenditure budget for each area is approved by the Procurement and Outsourcing Committee, expenditure is controlled monthly by the Management Committee, and two half-yearly

controls are also carried out by the Procurement and Outsourcing Committee.

In this context, the Bank reports the following metrics in quantitative sheet G1 on payment terms:

- **Average number of days to pay an invoice,** calculated from the date when the contractual or statutory payment period begins to run: 60 days.
- **Percentage of payments made within the terms of the deadlines** agreed by the Bank with suppliers: 99.94%

These metrics reflect Caja Rural de Navarra's performance in meeting its commitments to third parties.



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**T1**

## Responsible tax

### GOVERNANCE

Caja Rural de Navarra Group has robust internal control procedures to facilitate the prevention of tax evasion and avoidance, such as the Criminal Compliance Management System (SGCP), based on the UNE 19601 Standard and certified by the certification body AENOR. The main purpose of this system is to avoid, or at least minimise the risk of illegal behaviour within the scope of the Group's own activity, as well as to accredit that Caja Rural de Navarra Group exercises the necessary controls over its activities, complying with all requirements of the Spanish Criminal Code.

This system is based on a Criminal Compliance Policy, the principles of which are available to the public and other stakeholders on the Caja Rural Group's website and which also applies to its controlled subsidiaries: Informes y Gestiones Generales S.A. and Promoción Estable del Norte S.A., which carry out activities complementary to those of Caja Rural de Navarra, as well as Explotación Agrícola Las Limas, S.L. and Espiga I&D Alimentaria, S.L., as they are supported by the Social Welfare Fund. This is in line with Caja Rural de Navarra Group's principle of "zero tolerance" with regard to the commission of crimes in its business relations.

In addition to the Criminal Compliance Management System, the Bank has a Financial Reporting Control model that complies with the provisions of Law 10/2014, of 26 June, on the regulation, supervision and solvency of Credit

Institutions, as well as with securities market regulations.

Caja Rural de Navarra Group is committed to strict compliance with all national and international regulations governing its activities and proper conduct and development of its business. To this end, it has Internal Areas/Departments with designated responsibilities in matters of corporate governance, including tax, such as the Legal and Tax Department or the Regulatory Compliance Function.

Certain activities to guarantee regulatory compliance are directly managed through specialist units, with the Regulatory Compliance Unit taking a coordination and monitoring role. These include Combating Money Laundering and Terrorist Financing through Internal Control, personal data protection through the Data Protection Officer (DPO), customer protection in the distribution of banking and investment products through the Product Committee and criminal liability through the Corporate Compliance Officer.

Also, as indicated above, Caja Rural de Navarra Group has an Ethics Channel which forms part of the Internal Reporting System, implemented in accordance with Law 2/2023, on the protection of people who report regulatory infringements and the fight against corruption. This system ensures that all reports are handled appropriately, guaranteeing the protection of whistleblowers who report possible misconduct.

As this indicates, all the corporate policies and procedures implemented seek to ensure that the structure of Caja Rural de Navarra Group is not used for activities related to money laundering or terrorist financing, thus guaranteeing the integrity of its operations and compliance with the regulations in force in this area. The establishment and execution of these processes is supervised by

the Executive Service for the Prevention of Money Laundering (SEPBLAC).

### STRATEGY

For Caja Rural de Navarra Group, the concept of responsible taxation is understood as the clear, complete and accessible disclosure of information related to the Group's tax management. This includes the payment of taxes and tax benefits obtained, ensuring that this information is available to all stakeholders in a transparent manner. Accordingly, as we shall see below, in its Statement of Non-Financial Information (NFI), Caja Rural de Navarra Group has reported in detail on taxes paid, profits obtained by country and public subsidies received, thus contributing to greater understanding and clarity about its tax practices.

In addition, as part of its strategy to implement a responsible tax policy, the Bank has a Criminal Compliance Policy, which establishes, in its Annex I: Principles of action, the guidelines related to tax crime (point 2.12). Through Principle 2.12. "We are committed to fluidity, transparency and loyalty in the relationship of the Bank with the tax authorities and the Social Security", the Bank defends proper tax management and contributes to sustaining public spending, promoting transparency in all transactions with the Tax and Social Security agencies, and active collaboration with these bodies.

For this reason, certain conduct is prohibited, including:

→ Any avoidance of payment of taxes, withholdings or amounts that should have been withheld, or any payment in kind that result in undeserved rebates (e.g. failure to file the relevant tax returns).

→ Avoiding payment of social security contributions, undeservedly obtaining refunds of such contributions or enjoying undeserved deductions to the detriment of the social security system.

→ Any failure to keep business accounts and tax ledgers or records (e.g. false or double bookkeeping; failure by the person responsible to record certain transactions in the books).

Bank employees are required to comply with Bank's internal rules, in particular the Accounting Policy Handbook and the principles set out in the Code of Conduct. These internal rules serve as a guide to best practices in tax management and the prevention of tax-related offences.

Consequently, non-compliance with Business Principle 2.12 could lead to the commission of a Social Security offence, a tax offence and/or an offence of non-compliance and false accounting.

Furthermore, the anti-corruption and anti-bribery framework identifies tax crime as one of the offences to which the Bank is exposed within the scope of its business activity. In this regard, the Bank regularly reviews the control framework related to this risk.

The Criminal Compliance Management System Manual includes the following specific controls aimed at preventing criminal conduct related to tax:

- **External tax advice.**
- **External Audit of accounts.**
- **Specific training for employees on personal income tax management.**
- **Course on tax updates and tax closure.**
- **Automated procedures for the withholding and collection of indirect taxes**



These controls explicitly related to tax are supplemented by other controls to prevent offences related to breaches of the Group's accounting obligations.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

The Double materiality assessment carried out by Caja Rural de Navarra Group identified some material impacts and risks related to the Group's fiscal and tax management which, if they prove inadequate, could negatively affect the Bank in key areas such as regulatory compliance or the trust of its customers, suppliers and business partners.

The impacts assessed are categorised by their likelihood of occurrence and severity of impact for Caja Rural de Navarra Group. The material impacts identified in the analysis have been considered actual positive impacts for the Group, as they are related to the compliance and transparency of the Bank's tax obligations, and the Bank has reported transparently and in detail on taxes paid and its tax practices in its Non-Financial Statements.

The risk assessment is based on both their likelihood of occurrence and their potential impact, allowing informed decisions to be made on which risks need to be managed with greater urgency. In relation to responsible taxation, only one material risk associated with non-compliance with tax regulations has been identified. Furthermore, the Group's exposure to this risk is low because Caja Rural Navarra currently controls, monitors and mitigates this risk through various internal procedures and policies that ensure compliance with all legal and tax requirements, such as the Criminal Compliance Management System and the Ethics Channel.

In addition, in order to minimise the risk of tax non-compliance on the part of Caja Rural de Navarra employees, the company has regulatory training in matters such as the Prevention of Money Laundering and Compliance.

## METRICS AND TARGETS

The Group fulfils its tax obligations under the applicable local, regional and state tax authorities. Total amounts incurred by the subsidiaries for financial years 2023 and 2024, as reported by the Group companies at year-end, are as follows:

Tax information (EUR)	2024	2023
<b>Corporate income tax</b>	889.337,37 €	1.213.119,77 €
<b>Business tax</b>	52.731,89 €	98.084,47 €
<b>Real estate tax</b>	173.037,34 €	77.908,25 €
<b>VAT (output VAT - input VAT = VAT paid)</b>	1.360.464,91 €	1.939.482,91 €
<b>Other taxes and charges (except refuse collection)</b>	74.825,46 €	24.566,06 €



It should be noted that the values corresponding to Value Added Tax are low because the cereal business is subject to reduced rates, while on the input side its supplies, investments and outsourced services contracted to third parties are taxed at the general rate. Also, there are certain activities that are exporters.

With regard to subsidies, subsidiaries apply for investment or operating subsidies, where applicable. The amounts approved, if any, come with the condition that, as a Group, they retain their status as a large company.

No data is available for subsidies received by subsidiaries in 2024 and 2023. Nor have the subsidiaries

made any irrevocable donations through the box relating to social purposes on corporate income tax returns.

The Group has adopted a firm and committed approach to responsible taxation, ensuring that its tax obligations are managed in an ethical and transparent manner. In this regard, it should be noted that Caja Rural de Navarra Group does not consider it necessary to define goals or targets in tax matters.

It also promotes transparency, actively contributes to social development and supports sustainability through its investments in non-profit initiatives:

Tax information (EUR thousands)	2024	2023
<b>Profit before tax</b>	274.484	236.270
<b>Income tax</b>	(29.350)	(25.905)
<b>Total public subsidies received</b>	2.060	336
<b>Appropriation of capital grants to profit for the year</b>	336	336
<b>Contributions to foundations and non-profit organizations</b>	25.675	20.800

CSR report figures are also reported:

Data from CSR report (EUR)	2024	2023
<b>TURNOVER</b>		
<b>Total assets</b>	17.435.442 €	16.315.303 €
<b>Shareholders' equity</b>	2.080.064	1.791.433
<b>Customer deposits</b>	12.833.603	12.132.882
<b>Loans and advances to customers</b>	9.401.550	9.243.273
<b>PROFIT</b>		
<b>Net interest income</b>	315.969	264.255
<b>Gross income</b>	479.533	409.346
<b>Administrative expenses</b>	148.387	137.396
<b>Profit after tax</b>	245.134	210.365
<b>DISTRIBUTION OF WEALTH GENERATED</b>		
<b>1. Directly generated economic value</b>	568.621	503.993
<b>Gross income (excluding other operating expenses)</b>	564.915	500.287
<b>Proceeds of sales, property and equipment and foreclosed assets</b>	3.706	3.706
<b>2. 2. Distributed economic value</b>	268.100	257.802
<b>Payment to suppliers (operational expenses)</b>	118.698	126.369
Other general administrative expenses	58.991	56.228
Other operating expenses	59.707	70.141
<b>Personnel expenses</b>	89.396	81.168
<b>Income tax</b>	29.350	25.905
<b>Interest on investment capital</b>	4.981	3.560
<b>Investments/Donations to the community</b>	25.675	20.800
Education and Development Fund (EDF)	25.675	20.800

## T2 Data privacy and security

In line with the EBA Guidelines on ICT and Security Risk Management, Caja Rural de Navarra Group has in place various policies in relation to technological risks and information security, the development of which has led to the creation of governing bodies and the definition and establishment of a Technology Risk Control Function.

These policies are periodically reviewed and constantly adapted in accordance with the Digital Operational Resilience Act (DORA) and the European Network and Information Security Directive (NIS), incorporating best practice into the Management Framework, incident management and reporting, and the management and alignment of technology providers with the Group's policies.

As a result, technical and procedural measures have been adopted to ensure the identification, management and mitigation of technological risks, improving the security, integrity, authenticity and availability of information with special attention to the cybersecurity framework. All of this is aligned with the corporate principles of Technological Risk and Security Management of the Caja Rural Group.

With this in mind, Caja Rural de Navarra carried out an analysis of Digital Operational Resilience, in accordance with the DORA Regulation, obtaining a level of compliance of 81%, a high level compared to other organizations of a similar size. The conclusions of this analysis included that Caja Rural de Navarra:



- Meets fundamental requirements such as that to manage and assess the Group's exposure to potential operational risks.
- Has a robust risk management framework, which includes a comprehensive assessment of operational and technological risks, and effective supervision by the relevant governance bodies, the Management Committee and Governing Board.
- Has implemented comprehensive business continuity planning with regular testing and training of staff to address any operational disruptions.

However, opportunities and areas for improvement were identified, such as:



- The need to strengthen the management and supervision of third-party suppliers and the implementation of additional cybersecurity measures in the Caja Rural Group to strengthen the organization's resilience to growing cyber threats.
- Caja Rural de Navarra has a regularly tested Business Continuity Plan, but it must actively work on updating the Communication Plan to include all the necessary interlocutors.
- Caja Rural de Navarra details how it identifies and assesses the importance of assets in its ICT inventory. However, it should carry out an asset labelling project to improve risk management, facilitating the assessment and understanding of critical assets, their interconnections and their vulnerability to various risks, in line with the project being defined by the Caja Rural Group's Cybersecurity Sub-Committee.

On the other hand, it should be pointed out that Caja Rural de Navarra has partially delegated to Rural Servicios Informáticos (RSI) certain aspects of its ICT policy, such as implementation of the ICT strategy and the execution of reviews, evaluations, security tests and ICT project and change management. The aspects delegated to RSI were assessed in the Internal Audit of the ICT and security risk management guidelines, included in RSI's 2023 Annual Audit Plan. This is why 75% of controls were assessed (in full) under the EBA/GL/2019/04 standard for this audit.

### Technology Risk Management

In view of the recent regulation and the need to establish a management model for technological risks in the organization, Caja Rural de Navarra has developed an ICT and Security Risk Policy which, having been approved by the Governing Board and aligned with regulatory requirements, establishes the objectives, responsibilities and behaviour necessary to manage business processes and information assets in a secure professional environment.

Exposure to ICT and Information Security risks is adequately controlled and considered appropriate to the Group's risk appetite. It is structured around the following axes:

- Involvement of all staff in its management, including administrative bodies.
- Specific functions and bodies in charge of ICT and Information Security risk management, including the Technology Risk Control Function.
- An internal procedure for the identification of threats and vulnerabilities of information assets, business processes and the Group's

own activities that allows it to make the adjustments needed to maintain the level of risk at acceptable levels.

- The Group has a formalised and updated register of all its ICT assets, jointly inventoried with the key contacts from the Internal Areas and owners of the Group's business processes and which is documented by the risk team.
- The Policy complies with the relevant regulations (EBA/GL/2019/04), identifying the following risks derived from the IT process, among others: security management, ICT operations management, ICT project and change management and ICT business continuity management
- The responsibilities of the Internal Audit Function include overseeing compliance with the ICT and Information Security Risk Management Policy through regular checks (minimum frequency: annual).

To manage its technology risks, Caja Rural de Navarra has an IT risk analysis programme in which the Group's different business processes are reviewed and analysed. As a result of this analysis, an action plan has been drawn up for Caja Rural de Navarra, which includes actions to reduce the residual risk level in areas where shortcomings were identified with respect to the control activities in the control framework on which the risk analysis was based. Although it is true that no risks above the established threshold (medium) have been identified in the Group, it is sensible to continue working on mitigating the medium risks. Hence the action plans to lower residual risk levels.

It should be noted that Caja Rural de Navarra has part of its technological infrastructure and, therefore, of its support processes, partially or totally delegated to RSI, as the main provider of technological services. Despite this, the Group is

ultimately responsible for these processes and is in charge of ensuring that they are executed correctly, follow all the defined procedures and backed by the associated security measures. Specifically, the methodology used in the IT risk analysis:

- is aligned with the ICT and security risk management guidelines (EBA/GL/2019/04).
- integrates concepts from recognised standards for the establishment and assessment of security controls (such as ISO/IEC 27002, NIST SP 800-53A, etc.).

## Data Protection Governance Model

The main objective of current data protection legislation is to safeguard and guarantee the privacy and data protection of natural persons in the context of the personal data processing activities carried out by companies in the course of their daily business.

As a consequence of the processing of personal data, companies must assume certain legal obligations and requirements under the General Data Protection Regulation 2016/779 of the European Parliament and of the Council of 27 April 2016, (the "GDPR"). The Bank must be able to demonstrate its compliance with these obligations, which are key to the protection and security of personal data. It is also bound by Spain's Organic Law 3/2018 of 5 December, on the Protection of Personal Data and guarantee of digital rights, (the "LOPDGDD").

For this reason, and in compliance with the principle of proactive responsibility, Caja Rural de Navarra Group has a Governance Model that lays the foundations for supervising and controlling compliance with the legal obligations

and requirements of the GDPR, so that clear responsibilities are defined when making decisions that may affect the processing of personal data of data subjects.

The main functions and roles that take responsibility within Caja Rural de Navarra's Data Protection Governance Model for the control and supervision of compliance with data protection regulations, are:

- **Governing Board:** Its functions in the area of data protection include: approval of the data protection governance model, approval of the measures defined in the action plan to remedy the deficiencies found in the annual audit plan, appointment of the Data Protection Officer, facilitating and enabling the Data Protection Officer to carry out his or her functions, etc. In addition, as the Group's main governance body, it reviews and approves the strategic plans, annual plans, risk management framework and budgets, including the IT budget.
- **Local head of data protection:** Their assigned functions include: proposing the appointment of the DPO and supervision in the event of outsourcing; approving the annual report, the annual plan of data protection audits as well as the different security measures necessary for the implementation of new applicable legislation; reviewing and approving procedures and the Data Protection Manual; updating and maintaining the Record of Processing Activities (RoPA); periodically carrying out the data protection impact assessment (DPIA) and risk analysis.
- **The Data Protection Officer (DPO):** This is a figure introduced by the GDPR whose ultimate aim is to facilitate and guarantee compliance

with data protection regulations under the coordination and monitoring of the Regulatory Compliance Unit. To achieve this, good communications between the savings banks and the DPO is essential to ensure compliance, which is why the following e-mail address dpo.entidades@rsi.cajarural.com has been defined as the main channel of communication between the two.

- **Systems Department:** This is the Internal Area responsible for defining and implementing systems and applications in matters of privacy and data security that affect the processing of personal data, analysing the data protection impact of new developments, products, applications and/or processes and adapting or modifying them, and, for example, defining the training plan in matters of security.

The Data Protection Governance Model is structured in the following layers:


**GOVERNANCE LAYER:**

- Governance structure that adequately organises and delimits roles and responsibilities.
- Policies and the overarching framework that applies to all components of the framework, and which sets the privacy strategy.


**MONITORING AND  
CONTROL LAYER**

- Control model based on three layers of defence
- Management model/scorecard to enable decision-making. - Monitoring of mitigating action plans and consolidated record of GDPR management..


**OPERATIONAL LAYER**

- Set of processes, procedures and operations that provide operational support for GDPR compliance. They must be coordinated with the supervision and control layer, and in accordance with the Governance Layer.

## Protection of Personal Data

In order to help the Group and its employees to comply with and adapt to the General Data Protection Regulation (RGPD), as well as to comply with the principle of proactive responsibility or accountability set out in article 5.2 of the GDPR, Caja Rural de Navarra has a Data Protection Manual, which describes key aspects in the day-to-day operations of the Bank. Among other points, it sets out the principles for the processing of personal data, the requirements that consent must meet to be valid, the information that must be provided to data subjects at the time of data collection and the rights and obligations that apply to data subjects, data controllers and data processors.

The principles set out in the Manual, relating to Article 5 of the GDPR, are as follows:

- **Principle of legality**
- **Principle of transparency**
- **Principle of proportionality**
- **Principle of accuracy**
- **Principle of limitation of the retention period**
- **Principle of integrity and confidentiality**
- **Principle of proactive responsibility**

The Bank has a GDPR Monitoring Report that summarises the work by the Group in monitoring compliance with the GDPR and LOPDGDD. The Group also prepares an annual GDPR Report, which specifies the most important developments during

the year and is intended to make sure the Group achieves an adequate level of compliance with the GDPR and LOPDGDD. In addition, this report establishes a documentary trace of due diligence, by comparing the Data Protection actions carried out in successive periods. This makes it possible to identify areas for improvement and to take the appropriate management measures.

GDPR rights belong to customers, suppliers, employees and related third parties (guarantors, proxies, representatives, etc.). In general, the Bank has three channels through which data subjects can exercise their GDPR rights:

- **By e-mail.**
- **By post.**
- **By going to the branches.**

In addition, Article 35 of the GDPR requires data controllers to carry out, prior to processing, an assessment of the impact of the processing operations on the protection of personal data. In carrying out this data protection impact assessment, the Bank is assisted by the Data Protection Officer. The DPIA is reviewed on an annual basis and whenever there is a relevant change in the context of the processing activities that may lead to an increase in the risk associated with the processing. The Bank's DPIA can be found in Globalsuite and is made available to the Spanish Data Protection Agency upon request.

## Internal management policies and procedures

Caja Rural de Navarra has the following internal policies and procedures that set the basis for actions in the field of data privacy and security:

- **Cookies Policy for the Bank's website**
- **Data Protection Policy for Minors and People with Disabilities**
- **Customer Data Protection Policy**
- **Data Protection Manual**
- **ICT Operations Management and Security Procedure**
- **ICT Systems Acquisition and Development Policy.**
- **ICT Project Management Policy**
- **ICT Risk Management Policy**
- **Information Security Policy**
- **Physical and Environmental Security Policy**
- **Business Continuity Policy**
- **Privacy by Design and by Default procedure**

Additionally, Caja Rural has specific controls to prevent or mitigate the commission of criminal offences related to privacy and data security. Specific controls aimed at preventing activities related to crimes against personal and family privacy include the following:

- Existence of a Data Protection Officer (DPO).
- Centralization of third party data protection complaints.
- Management of security breaches.



- Review of data protection documentation.
- Data protection rules for the use of IT tools.
- Confidentiality and data protection clauses in contracts with suppliers.
- Passwords for access to computer systems.
- Traceability and access control to customer databases.
- Data protection training.
- Data protection verification process..
- Procedure for the conservation and archiving of information and documentation.

Specific controls aimed at preventing criminal conduct related to computer-related damage include the following:

- Data protection rules for the use of IT tools.
- Business continuity policy.
- Audit of IT systems.

Specific controls aimed at preventing criminal conduct related to intellectual and industrial property offences include the following:

- Data protection rules for the use of IT tools..
- Commercial communications policy.
- Inventory of software licences acquired by the Group.

Specific Controls aimed at preventing conduct related to the disclosure and discovery of trade secrets include the following::

- Data protection rules for the use of IT tools.
- Procedure for the conservation and archiving of information and documentation.
- Confidentiality and data protection clause in contracts with suppliers.
- Passwords for access to computer systems.

### Other binding regulations

In addition to all the aforementioned regulations, the Bank's Data Protection Manual adopts the following rules and standards to ensure data security within the Group, in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council) and Organic Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights.

In addition, advertising sent by electronic media (SMS and/or e-mail) will come under the Law on Information Society Services and Electronic Commerce (LSSI).

### Training and prevention

Caja Rural de Navarra, in its drive to strengthen its data protection measures, runs various training and awareness-raising actions:

- All new employees receive a data protection course as part of the welcome training package.



- There are cross-cutting training and awareness-raising programmes for staff on data protection, prevention and cybersecurity.
- The DPO Service runs specific training for all CRN employees on data protection in the financial sector. This data protection training is available to all employees on the Caja Rural de Navarra Virtual Classroom platform.
- In addition, the DPO Service publishes a monthly newsletter on the blog shared with the Bank where significant news about data protection or other regulations or references affecting data protection is analysed.
- Employees should also be familiar with the Roles and Responsibilities of Staff and the Policy on the use of Information Media, which are available on the Employee Portal.

Caja Rural de Navarra has an Internal Reporting System (IRS) and Whistleblowing Channel to reassure the stakeholders – whistleblowers, members, customers, suppliers, administrative bodies, courts and wider society in general – that the Bank complies with its legal duties to protect whistleblowers, and has communication channels and effective measures in place to mitigate the risk of non-compliance with its obligations.

There were no firm penalties, warnings or cases of non-compliance in this area in 2024.

## Rural Servicios Informáticos (RSI)

As mentioned above, RSI is Caja Rural Group's vehicle for defining and implementing the shared strategy for automated data processing at the Caja Rural Group. As such, it is a Banking IT firm that designs, develops and manages solutions and services for Caja Rural Group banks and now also for other customers.

Rural Servicios Informáticos (RSI) has obtained several certifications for its Technological Outsourcing Services:

- **ISO27001 (ISMS) by AENOR - Information Security (Information Security Management Systems)**
- **ISO22301 (BCMS) by AENOR - Business Continuity (Business Continuity Management Systems)**
- **UNE19601/UNE-ISO 37001 by AENOR - Criminal and Bribery Risk Management System (Criminal Compliance Management System and Anti-Bribery Management System)**

- **Reasonable assurance report on the overall IT control framework under ISAE3402 Type 2 (SOC1).**
- **LEET Cybersecurity rating (Services Rating) + C4V**
- **AAA rating in PINAKES (Interbank Cooperation Centre) in relation to the areas of confidentiality, integrity and availability.**
- **Payment Card Industry Data Security Standard (PCI - DSS)**
- **SEAL ADMS (Advanced Digital Manuscript Signature)**
- **SWIFT CSP by Service Bureau - SWIFT Customer Security Programme (CSP)**
- **TIER III - DPC DOCALIA and TIER III (Design) – Tres Cantos Data Processing Centre for the infrastructure of its facilities.**
- **ISO 9001 by AENOR - (Quality Management System) for its processes of providing IT services to non-member entities.**
- **ISO 14001. INDEX C - Business Processes**

## T3 Innovation and Digitization of more responsible processes and services

### Innovation and Digitization

To guarantee the high quality of its services, Caja Rural de Navarra Group pursues constant innovation, seeking excellence in the processes and actions carried out and versatility and adaptation to new needs and demands.

Aware that innovation and digitization can bring extraordinary advantages and a more prosperous future for society as a whole, Caja Rural de Navarra Group's social work is oriented through four areas of activity, including:

- **The promotion of education and technology, supporting the different digitization processes.**
- **Support for entrepreneurship and innovation as a form of progress.**

Caja Rural de Navarra Group also makes a direct contribution to achieving Sustainable Development Goal 8 on decent work and economic growth, through different job creation initiatives and actions, as well as through the promotion of entrepreneurship and innovation.

On this point, Caja Rural de Navarra has a dedicated financing stream to support entrepreneurship, Línea Inicia, created in 2007, through which it encourages and supports entrepreneurship, both

by providing funding and by driving and promoting actions linked to entrepreneurship and innovation in all regions where the Bank is active. Since its launch, Línea Inicia has financially supported 2,866 projects, with a total of 4,992 initial partners. In 2024 alone, it has enabled the development of 197 new projects led by 362 entrepreneurs, providing a total of 12.27 million euros in financing.

It has also signed collaboration agreements with different actors looking to support entrepreneurship, with the aim of promoting innovative projects through mentoring and training support, for example:

- **Collaboration with CEIN (Impulso Emprendedor programme).**
- **Call for start-ups selection and acceleration: Berriup and Deusto University/Berriup – CEIN – Sodena**
- **Collaboration with Consorcio Eder (Ribera Nexo programme).**
- **Ribera Nexo: incubation and acceleration programme for entrepreneurial and innovative projects in the Ribera de Navarra.**

Caja Rural de Navarra is also committed to supporting the different local processes to promote digitization, whether with individuals, companies or institutions, through programmes such as:

#### → **Enpresare grants**

Rural Kutxa: a programme to promote the transition to Industry 4.0 in industrial SMEs in Bergara and the District of Debagoiena, by supporting young talent, as well as innovative projects and entrepreneurship/

intra-entrepreneurship initiatives, through dual training. Specific focus on Smart Manufacturing, Artificial Intelligence and Big Data.

#### → **Family business immersion programme**

Part of the Family Business Chair of the Antonio Aranzabal Foundation and Deusto Business School, its aim is to attract young talent to family businesses in Gipuzkoa and increase their visibility among university students, in order to show them an interesting training alternative leading to high-quality jobs in the future.

Caja Rural de Navarra has also run training and awareness-raising activities on technology and digitization such as:

#### → **Digitization for the elderly:**

Training workshops on digital skills, spread across different towns and neighbourhoods in Navarre, the Basque Country and La Rioja, with the aim of closing the digital divide and facilitating financial inclusion for all.

#### → **Digitize Transform your Company:**

Programme run in collaboration with Cámara Navarra supporting 14 businesses to totally transform their business to digital by diagnosing their needs and offering training and personal support.

#### → **Cybersecurity for SMEs:**

Working with CEN and Navarra Cybersecurity Centre to promote cybersecurity training through gamification, impacting nearly a thousand employees of SMEs in Navarre.

Finally, it should be noted that one of Caja Rural de Navarra's priorities is to constantly improve our digital channels, without sacrificing our principals of local service and proximity to our customers. For this reason, A big element here is the Bank's investment in technology to make it easier for those customers who so wish to conduct any transaction through digital channels. An important tool for this is the service the Bank offers its customers through Ruralvía, its digital banking facility, accessible through a range of devices including computers, smart phone, tablet and other IT apps (Ruralvía pay, etc.) as well as the ATM network. There are also the constant upgrades to the functionalities of existing digital tools, including recently:

- **Loan, leasing and renting recommender on the website.**
- **Personal loan and mortgage simulator on the website.**
- **A dedicated website where confirming customers can access, check and anticipate payments from their supplier.**

### Sustainable finance

Caja Rural Navarra's strategic and corporate purpose is to promote social cohesion, balanced economic growth and the preservation of the environment, taking into account the United Nations SDGs and the Principles of Responsible Banking.

What is more, the European Commission has allotted financial institutions a crucial role to play in its wide-ranging Sustainable Finance Plan, and the role comes with numerous and demanding regulatory requirements. These include EU Regulation 2019/2088 on sustainability-related

disclosure in the financial services sector and EU Regulation 2020/852 on Taxonomy, a single and homogeneous framework in relation to what are considered sustainable assets, projects, categories and services. There are also amendments and proposed amendments to existing regulations: CRR II, on own funds ratio and requirements, Delegated Regulation 2017/565 and Delegated Directive 2017/593 (both related to MiFID II). Finally, there are guidelines, guides, questions and answers and other communications issued by supervisors: EBA on lending, ECB and BoE on supervisory expectations on climate risks, and CNMV on clarifying aspects of some of the aforementioned regulations.

In this respect, Caja Rural de Navarra and all the savings banks belonging to the Caja Rural Group have developed frameworks and policies to meet the regulatory requirements of Sustainable Finance and to adopt the practices of the financial sector in non-regulated matters where appropriate.

Note, too, that Caja Rural de Navarra Group will be keeping a close eye on changes to the regulatory environment and amendments to regulations at European level, resulting from the ongoing debate in the EU and development of the so-called Omnibus Law, which aims to reduce duplication in certain regulatory frameworks, especially sustainability disclosures, by exploiting synergies in overlapping requirements.

## Sustainable Finance and ESG Risks Policy

Caja Rural de Navarra Group has grown as a Financial Institution with a firm social commitment to its business, and which engages with its stakeholders (customers, shareholders, employees, suppliers, etc.) to support the sustainable development of its territories. Accordingly, the Bank's main focus with regard

to all its stakeholders is on the establishing and developing strategies, processes, methodologies, and control and monitoring systems related to Environmental, Social and Governance (ESG) risks. The main objective of the Sustainable Financing and ESG Risk Policy is to define and detail the Bank's approach to managing environmental, social and governance (ESG) risks as part of its risk management process and define and detail its integration and consideration in the processes for granting various types of finance to the relevant customers. This Policy reflects the demands of its stakeholders, as well as those of the Supervisory and Regulatory Bodies of the EU and Spain.

This Policy expresses the need to integrate ESG criteria and risks into the lending procedures, to ensure that such risks are considered when granting finance and thus comply with regulatory requirements and with the Bank's intention to finance the transition to a more sustainable economy. The Bank's approach to financing a sustainable economy is embedded in the framework of its lending processes.

ESG risks are the subject of internal and external communications through the corresponding channels. Caja Rural de Navarra discloses information on its ESG risk profile, as well as on the applicable criteria and factors, through the corresponding public reports established by regulations, such as the Non-Financial Statements. It also publishes an annual Corporate Social Responsibility (CSR) report, which covers ESG factors and risks, and other more specific reports on sustainable finance, such as the Loan Portfolio Allocation and Impact Report, which is included in full as an Annex to this report.

These reports give customers a high degree of transparency on how the Bank manages the applicable risks and the definition of its objectives and performance. The Bank also has an ESG risk

communication policy that covers all relevant stakeholders.

In the field of sustainable finance, Caja Rural de Navarra has established a Sustainable Bond Framework, with the aim of complementing its general ESG policies and establishing the criteria for investing in financial assets, in accordance with the best socially and environmentally responsible investment practices. It also has a sustainability framework for its loan portfolio in order to promote those financing lines that have the greatest social and environmental impact in the regions where the bank is active in line with the priorities of its social projects.

In addition, Caja Rural de Navarra has a currently approved Sustainability Master Plan, which defines, among other points, the tasks required to properly consider ESG risks and factors, and establishes a total of 63 lines of action and 171 tasks (34 of which focus solely on the area of risks). The tasks, lines of action and goals are established for short, medium and long terms. Implementation is assured and supervised by the Sustainability Committee.

## Socially Responsible Investment

Caja Rural de Navarra implemented a Sustainability Framework for its loan portfolio in order to promote those financing lines that have the greatest social and environmental impact in the regions where the Group is active. These lines are consistent with its commitment to the local social and natural environment.

The Group prioritises responsible banking with a long-term view of its customers' needs regarding products (transparency and advice on investment and financing products) and in its marketing processes, emphasising local connections and quality of service.

Along these lines, as indicated in section S4-5, Caja Rural de Navarra has been implementing a socially responsible investment strategy in recent years from three different but interrelated perspectives:

### SALES

- Managing the full range of pension plans and voluntary social provision plans (Entidades de Previsión Social Voluntaria or EPSVs) according to socially responsible investment (SRI) criteria. They include impact investment funds (known as Article 9 funds under Regulation (EU) 2019/2088), such as Rural Impacto Global, FI, an investment fund directly invested in international equities whose investment policy seeks to further the UN Sustainable Development Goals (SDGs).
- Marketing sustainable funds, a total of 5 funds promoting environmental and social features, and one environmental and social impact fund:
  - **Rural Rendimiento Sostenible, FI.**
  - **Rural Sostenible Conservador, FI**
  - **Rural Sostenible Moderado, FI Fondo Sostenible y Solidario**
  - **Rural Sostenible Decidido, FI**
  - **Rural Futuro ISR, FI Fondos Sostenible y Solidario.**
  - **Rural Impacto Global, FI.**
- Managing all model portfolios of the Discretionary Portfolio Management service according to socially responsible investment criteria.





- Creating a video and leaflets explaining the socially responsible investment funds marketed by Caja Rural de Navarra for the commercial network and for customers..

### REGULATIONS

- Regulatory requirements on socially responsible investment continued to be implemented, following the principle of better compliance, given the lack of regulatory clarity that persists in the sector. In particular, governance of investment products continues to be adapted to update the target market and product brochures to the new requirements for socially responsible investment.
- Integrating the new regulatory requirements to the sustainability module of suitability tests. Adapting advice on customers' investment decisions to their sustainability preferences in savings and investment products..

### EMPLOYEE TRAINING:

- Green MiFID: all staff are now certified with a MiFi II advisory certificate after taking a MiFID II course.
- Continuing to provide the commercial network with information materials on this subject.
- Maintaining a module on Sustainable Finance on the Bank intranet so employees better understand the practical application of these regulatory changes in the commercial relationship with our customers.

### ESG RISK MANAGEMENT

Caja Rural de Navarra Group integrates ESG risks and factors into its General Risk Management Framework, through which these risks are managed, monitored and mitigated over a

long-term perspective. The Risk Management Framework is reviewed periodically, ensuring that it is up-to-date and that new risk factors that may be applicable to the Group are included.

Adapting the Risk Management Framework to incorporate ESG risks meant including a number of functions, roles and responsibilities in the area of ESG risk management. To manage these risks, the Bank defined a Sustainability Master Plan roadmap which, together with the General Sustainability Policy, lays out the tactical and strategic plans in the area of sustainability. Both documents were approved and are updated by the Governing Board of the Bank.

At Caja Rural de Navarra Group, ESG risks are managed in a cross-cutting manner and integrated with the other applicable risks, such as credit risk or market risk.

In addition, Banco Cooperativo Español, a member of the Caja Rural Group, has a Policy for the Integration of Sustainability Risks in Investment Advice, which considers sustainability aspects and criteria in investment advice, and offers "Socially Responsible Investment" (SRI) products within an investable universe determined by criteria that include ESG aspects. Regarding investment and portfolio management, the Bank has followed this Policy and classified its portfolio in light of the taxonomy regulation and its technical requirements.

Furthermore, the Remuneration Policy applicable to the Bank is consistent with the integration of sustainability risks defined in the Policy for the Integration of Sustainability Risks in Investment Advice. Thus, the principles of the remuneration policy include consideration not only of financial risks but also of non-financial risks (sustainability risk).



## **SUSTAINABILITY COMMITTEE**

Caja Rural de Navarra Group has set up a Sustainability Committee to deal with those issues most directly related to ESG matters. This Committee has two missions, both approved by the Governing Board: a general mandate to drive forward the General Sustainability Policy of the Bank, and a specific remit to organise implementation of the Guiding Plan for Sustainability (putting into practice the Action Plan for Strategy and Governance).

The Committee will be assisted in its work by the Group's technical support in the form of the "Sustainability Office", staffed by employees of the Bank.

The Sustainability Committee is made up of people with responsibility for various departments such as:

- **Treasury and Capital Markets**
- **Acción Social**
- **Risk Management Unit**
- **Regulatory Compliance**
- **HR**
- **Marketing**

Committee meetings will be held at least quarterly, in accordance with the calendar of meetings approved by the Committee itself.

## **INTERNAL GOVERNANCE MODEL**

Caja Rural de Navarra Group manages the ESG risk framework through the Governing Board

as the highest authority. The Governing Board in turn delegates the Risk Committee and the Sustainability Committee to define and develop ESG risk management strategies, and integrate them into the Group's risk processes.

The Group has also established a three lines of defence model, which is applied across the entire scope of ESG risk management as it relates to funding procedures, and is set out in the Policy.

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# Annex I

## **Material impacts, risks and opportunities**

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Environmental	The promotion of operationally safe and stable infrastructures, particularly in sectors such as mobility and sustainable transport, by providing financial solutions that encourage investment in infrastructure that is resilient to climate change and developing innovative financial products to manage the risks associated with climate events.	Impact	Positive	Actual	Climate Change	Climate Change Adaptation	Customers Company
Environmental	Entry into force of the new regulations that require changes to the procedures for providing financial advice and communications to customers, to take account of the increasing importance of ESG criteria in making investment decisions.	Risk	Regulatory and legal	-	Climate Change	Climate Change Adaptation	Customers
Environmental	Entry into force of new regulations that impose levies or restrictions on economic activities with a negative impact on climate change adaptation.	Risk	Regulatory and legal	-	Climate Change	Climate Change Adaptation	Customers Investees Shareholders
Environmental	Application of disciplinary measures to companies that engage in greenwashing or green-hushing.	Risk	Regulatory and legal	-	Climate Change	Climate Change Adaptation	Customers
Environmental	Increasing environmental awareness is driving profound changes in the preferences of consumers and other market actors that are forcing companies to adapt their business models to this new reality.	Risk	Market	-	Climate Change	Climate Change Adaptation	Customers Investees Shareholders
Environmental	Lack of accurate and reliable data that hampers the development of robust statistical models capable of measuring the potential impacts of climate and environmental risk factors.	Risk	Technological	-	Climate Change	Climate Change Adaptation	Customers Shareholders Investees
Environmental	Statistical integration of climate factors into credit and investment risk assessment processes to quantify and manage the financial impacts of climate change.	Opportunity	Financial Resilience	-	Climate Change	Climate Change Adaptation	Customers Shareholders Investees

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Environmental	Optimisation of operating costs by improving the resilience of the Bank's physical infrastructure to extreme weather events.	Opportunity	Resilience	-	Climate Change	Climate Change Adaptation	Human resources Shareholders
Environmental	Rising carbon footprint from the financing of customers in carbon-intensive industries.	Impact	Negative	Potential	Climate Change	Energy transition and decarbonisation	Customers Shareholders Investees Nature
Environmental	Driving the energy transition and building up key economic sectors through vehicles that finance and invest in decarbonisation projects.	Impact	Positive	Potential	Climate Change	Energy transition and decarbonisation	Customers Nature Investees
Environmental	Failure to meet GHG targets set by the Bank.	Risk	Regulatory and legal Reputational	-	Climate Change	Energy transition and decarbonisation	Investees Shareholders Nature Customers Company
Environmental	Failure to adequately implement the energy transition and decarbonisation could undermine perceptions of the Bank and its reputation.	Risk	Reputational	-	Climate Change	Energy transition and decarbonisation	Customers Investees Shareholders Company
Environmental	Initiatives to transition to use of renewable energy in the Bank as part of its carbon footprint reduction strategy.	Opportunity	Efficient use of resources	-	Climate Change	Energy transition and decarbonisation	Suppliers Nature
Environmental	Strengthening the Bank's reputation by decarbonising the loan book, achieving targets and supporting counterparties' decarbonisation initiatives.	Opportunity		-	Climate Change	Energy transition and decarbonisation	Customers



Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Environmental	Promote energy efficiency measures to cut energy consumption and costs.	Impact	Positive	Actual	Climate Change	Energy efficiency	Investees
Environmental	Compliance with regulations that penalise energy-inefficient economic activities or homes with poor energy efficiency ratings.	Risk	Regulatory and legal	-	Climate Change	Energy efficiency	Shareholders
Environmental	Development of energy-saving programmes targeted at all employees.	Opportunity	Efficient use of resources	-	Climate Change	Energy efficiency	Suppliers
Environmental	Finance and investment in high environmental impact industries, which generate air pollution and degrade the environment affecting people's quality of life and health.	Impact	Negative	Potential	Pollution	Air pollution	Nature
Environmental	Promotion of sector-wide policies to cut air pollution, avoiding the financing and investment in activities that have a high risk of environmental impacts.	Impact	Positive	Potential	Pollution	Air pollution	Customers
Environmental	Increased credit/market loss risk due to a failure to integrate environmental risks when assessing finance and/or seeking investment opportunities.	Risk	Risk	-	Pollution	Air pollution	Customers Investees Shareholders
Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain

<b>Social</b>	Loss of productivity from poor motivation and commitment among the workforce caused by poor working conditions in respect of working hours, pay, health and safety at work, diversity, inclusion, etc.	Risk	Acute	-	Management of talent and working conditions for own workers	Commitment, job satisfaction and attracting talent.	Human resources
<b>Social</b>	Decline in quality of service due to difficulties attracting and retaining talent and a failure to bring on new generations in the workforce.	Risk	Acute	-	Management of talent and working conditions for own workers	Commitment, job satisfaction and attracting talent.	Human resources Customers
<b>Social</b>	Promote employee well-being through initiatives to encourage healthy lifestyles and physical activity, prevent stress-related mental health problems and work-related accidents and run ergonomic working programmes.	Impact	Positive	Actual	Management of talent and working conditions for own workers	Health and workplace	Human resources
<b>Social</b>	Apply hiring policies that target vulnerable groups so promoting a more diverse and inclusive community.	Impact	Positive	Actual	Management of talent and working conditions for own workers	Diversity, equality and inclusion	Human resources Company
<b>Social</b>	Make sure branches are accessible to people with disabilities, in compliance with applicable law.	Opportunity	Reputational Regulatory and lega	-	Management of talent and working conditions for own workers	Diversity, equality and inclusion	Human resources Customers
<b>Social</b>	Strengthen the Bank's image and attractiveness to talent by promoting a working environment of non-discrimination on grounds of gender, origin, race, disability, religion or sexual orientation.	Opportunity	Reputational	-	Management of talent and working conditions for own workers	Diversity, equality and inclusion	Human resources Company
<b>Social</b>	Strengthen the Bank's image and attractiveness to talent by promoting a working environment of non-discrimination on grounds of gender, origin, race, disability, religion or sexual orientation.	Impact	Positive	Actual	Management of talent and working conditions for own workers	Training	Company

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Social	Ensure human rights are respected in all financing activities by requiring that companies meet international standards.	Opportunity	Reputational	-	Workers in the value chain	Protect and guarantee human rights in value chain activities	Investees
Social	Damage to communities and/or the environment caused by the conduct and/or financing of projects and operations.	Impact	Market	Potential	Social engagement and community relations	Socially responsible engagement and communication with the community and affected groups	Customers
Social	Agreements with public sector bodies to prevent financial/insurance exclusion in certain areas where the Bank is active.	Impact	Negative	Actual	Social engagement and community relations	Socially responsible engagement and communication with the community and affected groups	Company
Social	Strengthen the Bank's image through financing/investment projects for the local communities where it operates, including social volunteering.	Opportunity	Positive	-	Social engagement and community relations	Socially responsible engagement and communication with the community and affected groups	Company
Social	Promote initiatives for active dialogue and listening to improve and strengthen community relations.	Opportunity	Reputational	-	Social engagement and community relations	Socially responsible engagement and communication with the community and affected groups	Customers

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Social	Increase customer trust by adopting ethical and responsible marketing practices.	Opportunity	Reputational	-	Customer satisfaction and security	Responsible marketing	Human resources
Social	Facilitate accessibility and customer service through a range of communication channels (digital, physical, telephone, etc.), and by providing high-quality and secure financial products and services.	Impact	Positive	Actual	Customer satisfaction and security	Financial accessibility	Customers Company
Social	Proves impossible to adapt to new social standards on issues such as equality and diversity.	Risk	Reputational Regulatory and legal	-	Customer satisfaction and security	Financial accessibility	Customers
Social	Failure to meet the needs of certain population segments for accessing new products and/or services due to changing consumer preferences, which affects the Bank's business models.	Risk	Market	-	Customer satisfaction and security	Financial accessibility	Customers
Social	Clients find it hard to access products and services due to branch closures or a lack of physical and/or digital access provision.	Impact	Negative	Potential	Customer satisfaction and security	Quality and security of products and services	Customers
Social	Shrinking customer base and problems in capturing new customers due to dissatisfaction with inadequate digital services.	Risk	Market Reputational	-	Customer satisfaction and security	Quality and security of products and services	Customers

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Social	Disappointing levels of quality and security in the products and services offered.	Risk	Reputational Market	-	Customer satisfaction and security	Quality and security of products and services	Customers
Social	Customer discontent with the way customer services deal with incidents.	Impact	Negative	Potential	Customer satisfaction and security	Customer relations	Customers
Governance	Promotion of appropriate protections for whistleblowers through measures like dissemination of the Code of Conduct and internal and external whistle-blowing channels.	Impact	Positive	Actual	Ethics and transparency	Ethics and transparency	Suppliers Shareholders Investees Partners Company Customers Human resources
Governance	No cases of corruption, bribery or money-laundering.	Impact	Positive	Actual	Ethics and transparency	Ethics and transparency	Suppliers Shareholders Institutional investors Government bodies Partners Investees
Governance	Weaknesses in internal governance (standards, procedures, controls) intended to prevent crime and/or fraud.	Risk	Regulatory and legal Reputational	-	Ethics and transparency	Ethics and transparency	Company Government bodies Human resources



Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Governance	Strengthen trust by markets and customers by having a robust financial crime prevention framework, including independent auditing and continuous training for all employees.	Opportunity	Regulatory and legal Reputational	-	Ethics and transparency	Ethics and transparency	Suppliers Shareholders Institutional investors Customers Human resources
Governance	Ensure good corporate governance by implementing standards and best practice when making investments, making sure these activities are conducted in an ethical and responsible manner.	Impact	Positive	Actual	Corporate Governance	Governance bodies and responsible leadership	Government bodies Human resources
Governance	Promote best practice in corporate governance and responsible leadership through annual training programmes for members of the Governing Board.	Impact	Positive	Actual	Corporate Governance	Governance bodies and responsible leadership	Government bodies Human resources
Governance	Weaknesses in the performance of senior management functions, including in areas like diversity in decision-making, equitable compensation and the quality of skills development programmes.	Risk	Regulatory and legal Reputational	-	Corporate Governance	Governance bodies and responsible leadership	Company Human resources
Governance	Promotion of a culture of ethical enterprise and regulatory compliance, founded on trust and transparency, that can catch possible breaches early, protect those who comply with regulations, and involve all employees in a collective endeavour.	Impact	Positive	Actual	Corporate Governance	Corporate culture	Government bodies Human resources
Governance	Promotion of an organisational culture based on excellence, respect and proximity that can sustain and strengthen links with the community, while pursuing socially responsible economic growth.	Impact	Positive	Actual	Corporate Governance	Corporate culture	Company Customers Human resources

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Governance	Reputational damage from an inadequate corporate culture where behaviours fail to align with the Bank's internal ESG policies.	Risk	Reputational	-	Corporate Governance	Corporate culture	Company Customers Human resources
Governance	Improve the corporate image through good management of corporate ethics practices (e.g. Encouraging an ethical culture and compliance with the principles in the code of conduct and the Bank's other tools in this area).	Opportunity	Reputational		Corporate Governance	Corporate culture	Human resources
Cross-cutting	Promote relationships of trust with all taxation authorities based on transparent and ongoing communications to promote voluntary compliance with tax obligations.	Impact	Positive	Actual	Topics specific to CRN	Responsible tax	Company
Cross-cutting	Help improve the economic development of the Bank's environment through taxes paid.	Impact	Positive	Actual	Topics specific to CRN	Responsible tax	Company
Cross-cutting	Exposure to legal disputes over tax as a result of poor tax management, endangering the trust of customers, suppliers and commercial partners.	Risk	Regulatory and legal Reputational	-	Topics specific to CRN	Responsible tax	Suppliers Shareholders Partners Investees Institutional investors Government bodies Customers
Cross-cutting	Implement a continuous improvement process for cyberattack prevention and mitigation procedures, ensuring these are up-to-date with best market practice.	Impact	Positive	Potential	Topics specific to CRN	Data privacy and security	Suppliers Human resources Customers

Block	Description	IRO	Type	Sub-type	Topic	Sub-topic	Value chain
Cross-cutting	No breaches of data security or cyberattacks in the Bank (e.g. leaks of personal data)	Impact	Positive	Actual	Topics specific to CRN	Data privacy and security	Suppliers Human resources Customers
Cross-cutting	Cybersecurity training courses and awareness-raising of the issues across the Bank.	Impact	Positive	Actual	Topics specific to CRN	Data privacy and security	Human resources
Cross-cutting	Reputational damage to the Bank and legal penalties for personal data leaks due to poor IT safeguarding of data.	Risk	Regulatory and legal	-	Topics specific to CRN	Data privacy and security	Customers Shareholders Investees Partners Government bodies
Cross-cutting	Reducing the Bank's environmental footprint through digitization, less use of paper and minimising customers' travel by making functionalities available through their digital personal manager.	Impact	Reputational	Actual	Topics specific to CRN	Innovation and digitization of processes and more responsible services	Nature Customers
Cross-cutting	Extending digitisation by creating remote channels where our customers can transact more flexibly and simply (online and telephone banking).	Impact	Positive	Actual	Topics specific to CRN	Innovation and digitization of processes and more responsible services	Customers
Cross-cutting	Inadequate budgeting for innovation, preventing the company identifying and seizing new business opportunities.	Risk	Positive	-	Topics specific to CRN	Innovation and digitization of processes and more responsible services	Human resources

# Annex II

## **Corporate policies and identified IROs**

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	The promotion of operationally safe and stable infrastructures, particularly in sectors such as mobility and sustainable transport, by providing financial solutions that encourage investment in infrastructure that is resilient to climate change and developing innovative financial products to manage the risks associated with climate events.	Environmental policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Entry into force of the new regulations that require changes to the procedures for providing financial advice and communications to customers, to take account of the increasing importance of ESG criteria in making investment decisions.	Sustainable finance framework	<ul style="list-style-type: none"> <li>Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>
Ambiental	Entry into force of new regulations that impose levies or restrictions on economic activities with a negative impact on climate change adaptation.	Environmental policy Sustainable finance framework	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> <li>Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>



Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Application of disciplinary measures to companies that engage in greenwashing or green-hushing.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Increasing environmental awareness is driving profound changes in the preferences of consumers and other market actors that are forcing companies to adapt their business models to this new reality.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Lack of accurate and reliable data that hampers the development of robust statistical models capable of measuring the potential impacts of climate and environmental risk factors.	ESG Risk Policy Risk Appetite Framework	<ul style="list-style-type: none"> <li>Establish a framework to manage the risks associated with ESG factors within the Bank's operations and strategic decisions. This policy's principal goal is to identify, assess and mitigate risks deriving from climate-related regulatory changes, the physical risks from extreme weather events and opportunities arising from the transition to clean energy and sustainable project finance. The policy also enshrines a commitment to integrate ESG criteria into all the Bank's investment decisions and activities, ensuring mitigation and adaptation strategies are aligned with the goals of sustainability and the transition to a low carbon economy.</li> <li>Defines a set of sustainability indicators under its MAR system (Sustainability Indicators Framework), to measure how far it is meeting its climate commitments and sustainability targets. These indicators make it possible to quantify the impact of environmental policies and fulfilment of the climate goals set, as well as providing a basis for informed decision-making on future projects and alignment with long-term sustainability targets.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Statistical integration of climate factors into credit and investment risk assessment processes to quantify and manage the financial impacts of climate change.	ESG Risk Policy Risk Appetite Framework	<ul style="list-style-type: none"> <li>Establish a framework to manage the risks associated with ESG factors within the Bank's operations and strategic decisions. This policy's principal goal is to identify, assess and mitigate risks deriving from climate-related regulatory changes, the physical risks from extreme weather events and opportunities arising from the transition to clean energy and sustainable project finance. The policy also enshrines a commitment to integrate ESG criteria into all the Bank's investment decisions and activities, ensuring mitigation and adaptation strategies are aligned with the goals of sustainability and the transition to a low carbon economy.</li> <li>Defines a set of sustainability indicators under its MAR system (Sustainability Indicators Framework), to measure how far it is meeting its climate commitments and sustainability targets. These indicators make it possible to quantify the impact of environmental policies and fulfilment of the climate goals set, as well as providing a basis for informed decision-making on future projects and alignment with long-term sustainability targets.</li> </ul>
Environmental	Optimisation of operating costs by improving the resilience of the Bank's physical infrastructure to extreme weather events.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Rising carbon footprint from the financing of customers in carbon-intensive industries.	Sustainable finance framework	<ul style="list-style-type: none"> <li>Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Driving the energy transition and building up key economic sectors through vehicles that finance and invest in decarbonisation projects.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Failure to meet GHG targets set by the Bank.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Failure to adequately implement the energy transition and decarbonisation could undermine perceptions of the Bank and its reputation.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Initiatives to transition to use of renewable energy in the Bank as part of its carbon footprint reduction strategy.	Environmental Policy	<ul style="list-style-type: none"> <li>• Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Strengthening the Bank's reputation by decarbonising the loan book, achieving targets and supporting counterparties' decarbonisation initiatives.	Environmental Policy Sustainable finance framework	<ul style="list-style-type: none"> <li>• Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> <li>• Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Promote energy efficiency measures to cut energy consumption and costs.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Compliance with regulations that penalise energy-inefficient economic activities or homes with poor energy efficiency ratings.	Environmental Policy	<ul style="list-style-type: none"> <li>Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> </ul>
Environmental	Compliance with regulations that penalise energy-inefficient economic activities or homes with poor energy efficiency ratings.	Sustainable finance framework	<ul style="list-style-type: none"> <li>Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>



Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Finance and investment in high environmental impact industries, which generate air pollution and degrade the environment affecting people's quality of life and health.	Sustainable finance framework	<ul style="list-style-type: none"> <li>• Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>
Environmental	Promotion of sector-wide policies to cut air pollution, avoiding the financing and investment in activities that have a high risk of environmental impacts.	Environmental Policy Sustainable finance framework	<ul style="list-style-type: none"> <li>• Set clear guidelines for management and reduction of environmental impacts of the Bank's operations. The policy puts in place responsible corporate practices that reduce the Bank's environmental footprint, through efficient use of resources and appropriate waste management, and seeks to mitigate the potential problems of a drier climate for domestic cereal cultivation. It also sets out a climate change commitment, promoting the adaptation of its operations to the potential impacts of climate change and supporting mitigation efforts. The policy is an integrated part of the wider sustainability strategy and is aligned with the 2030 Agenda for Sustainable Development and the international climate goals.</li> <li>• Set a clear focus for issuing sustainable finance instruments such as green bonds and sustainability-linked loans to finance projects that support the transition to a sustainable economy. The framework defines what types of projects are eligible and the criteria for assessing and selecting projects that help mitigate climate change or adapt to its effects. With the framework, the Bank is seeking to mobilise capital for projects that make a positive impact, by reducing carbon emissions, improving energy efficiency or promoting renewable energy. The Second Party Opinion by an independent external body, Sustainalytics, provides assurance that the framework aligns with best international practice, the ICMA Green Bond Principles and Green Loan Principles.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Environmental	Increased credit/market loss risk due to a failure to integrate environmental risks when assessing finance and/or seeking investment opportunities.	ESG Risk Policy Risk Appetite Framework	<ul style="list-style-type: none"> <li>Establish a framework to manage the risks associated with ESG factors within the Bank's operations and strategic decisions. This policy's principal goal is to identify, assess and mitigate risks deriving from climate-related regulatory changes, the physical risks from extreme weather events and opportunities arising from the transition to clean energy and sustainable project finance. The policy also enshrines a commitment to integrate ESG criteria into all the Bank's investment decisions and activities, ensuring mitigation and adaptation strategies are aligned with the goals of sustainability and the transition to a low carbon economy.</li> <li>Defines a set of sustainability indicators under its MAR system (Sustainability Indicators Framework), to measure how far it is meeting its climate commitments and sustainability targets. These indicators make it possible to quantify the impact of environmental policies and fulfilment of the climate goals set, as well as providing a basis for informed decision-making on future projects and alignment with long-term sustainability targets.</li> </ul>
Social	Loss of productivity from poor motivation and commitment among the workforce caused by poor working conditions in respect of working hours, pay, health and safety at work, diversity, inclusion, etc.	Remuneration policy Health and safety policy Equality and non-discrimination policies Social protection policies	<ul style="list-style-type: none"> <li>Establish a fair and equitable remuneration policy which recognises the performance and contribution of every employee. It also ensures compliance with labour regulations and transparent salary management.</li> <li>Prevent labour risks and provide a safe and healthy working environment for all employees. This includes preventative measures, safety training and a focus on health at work.</li> <li>Ban any form of discrimination for reasons of gender, ethnic origin, incapacity, sexual orientation or any other characteristic. Policies and practices are reviewed regularly to make sure they are compliant and effective.</li> <li>Guarantee protection for staff in vulnerable situations, whether due to sickness, unemployment, retirement or maternity/paternity. Its target is to ensure the continuity income and access to benefits.</li> </ul>
Social	Decline in quality of service due to difficulties attracting and retaining talent and a failure to bring on new generations in the workforce.	Training plan	<ul style="list-style-type: none"> <li>Promote employees professional and personal development by offering training and upskilling programmes tailored to their needs and aspirations. Its aim is to improve the skills and employability of the Bank's own workforce.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Social	Promote employee well-being through initiatives to encourage healthy lifestyles and physical activity, prevent stress-related mental health problems and work-related accidents and run ergonomic working programmes.	Health and safety policy	<ul style="list-style-type: none"> <li>• Prevent labour risks and provide a safe and healthy working environment for all employees. This includes preventative measures, safety training and a focus on health at work.</li> </ul>
Social	Apply hiring policies that target vulnerable groups so promoting a more diverse and inclusive community.	Policies to integrate people with functional diversity into work Equality and non-discrimination policies	<ul style="list-style-type: none"> <li>• Promote the integration of people with disabilities into work, guaranteeing equal opportunities and non-discrimination on access to employment, training and professional development.</li> <li>• Ban any form of discrimination for reasons of gender, ethnic origin, incapacity, sexual orientation or any other characteristic. Policies and practices are reviewed regularly to make sure they are compliant and effective.</li> </ul>
Social	Make sure branches are accessible to people with disabilities, in compliance with applicable law.	Policies to integrate people with functional diversity into work Equality and non-discrimination policies	<ul style="list-style-type: none"> <li>• Promote the integration of people with disabilities into work, guaranteeing equal opportunities and non-discrimination on access to employment, training and professional development.</li> <li>• Ban any form of discrimination for reasons of gender, ethnic origin, incapacity, sexual orientation or any other characteristic. Policies and practices are reviewed regularly to make sure they are compliant and effective.</li> </ul>
Social	Strengthen the Bank's image and attractiveness to talent by promoting a working environment of non-discrimination on grounds of gender, origin, race, disability, religion or sexual orientation.	Policies to integrate people with functional diversity into work Equality and non-discrimination policies Equality plan Protocol on Prevention of workplace harassment, sexual harassment and gender-based harassment	<ul style="list-style-type: none"> <li>• Promote the integration of people with disabilities into work, guaranteeing equal opportunities and non-discrimination on access to employment, training and professional development.</li> <li>• Ban any form of discrimination for reasons of gender, ethnic origin, incapacity, sexual orientation or any other characteristic. Policies and practices are reviewed regularly to make sure they are compliant and effective.</li> <li>• Promote equal opportunities and non-discrimination on grounds of gender in the workplace. This includes measure to eliminate the pay gap, promote work-life balance and prevent sexual and gender-based harassment.</li> <li>• Prevent and address situations of workplace harassment, guaranteeing a respectful and non-violent working environment.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Social	Partnerships with educational institutions to create specialised training programmes.	Training plan	<ul style="list-style-type: none"> <li>Promote employees professional and personal development by offering training and upskilling programmes tailored to their needs and aspirations. Its aim is to improve the skills and employability of the Bank's own workforce.</li> </ul>
Social	Ensure human rights are respected in all financing activities by requiring that companies meet international standards.	Code of Conduct	<ul style="list-style-type: none"> <li>Establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.</li> </ul>
Social	Damage to communities and/or the environment caused by the conduct and/or financing of projects and operations.	Code of Conduct	<ul style="list-style-type: none"> <li>Establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.</li> </ul>
Social	Agreements with public sector bodies to prevent financial/ insurance exclusion in certain areas where the Bank is active.		
Social	Strengthen the Bank's image through financing/ investment projects for the local communities where it operates, including social volunteering.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>
Social	Promote initiatives for active dialogue and listening to improve and strengthen community relations.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>
Social	Increase customer trust by adopting ethical and responsible marketing practices.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Social	Facilitate accessibility and customer service through a range of communication channels (digital, physical, telephone, etc.), and by providing high-quality and secure financial products and services.	Banking and Investment Product and Services Marketing Policy Governance of Products and Services	<ul style="list-style-type: none"> <li>• It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> <li>• Detail the principles that underpin the Bank's procedures for creating/issuing or distributing products or providing services to its customers and reviewing existing products and services, guaranteeing compliance with applicable law and codes of best banking practice.</li> </ul>
Social	Proves impossible to adapt to new social standards on issues such as equality and diversity.	Policies to integrate people with functional diversity into work Equality and non-discrimination policies Equality plan	<ul style="list-style-type: none"> <li>• Promote the integration of people with disabilities into work, guaranteeing equal opportunities and non-discrimination on access to employment, training and professional development.</li> <li>• Ban any form of discrimination for reasons of gender, ethnic origin, incapacity, sexual orientation or any other characteristic. Policies and practices are reviewed regularly to make sure they are compliant and effective.</li> <li>• Promote equal opportunities and non-discrimination on grounds of gender in the workplace. This includes measure to eliminate the pay gap, promote work-life balance and prevent sexual and gender-based harassment.</li> </ul>
Social	Failure to meet the needs of certain population segments for accessing new products and/or services due to changing consumer preferences, which affects the Bank's business models.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>• It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>
Social	Clients find it hard to access products and services due to branch closures or a lack of physical and/or digital access provision.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>• It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>
Social	Shrinking customer base and problems in capturing new customers due to dissatisfaction with inadequate digital services.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>• It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>
Social	Disappointing levels of quality and security in the products and services offered.	Banking and Investment Product and Services Marketing Policy	<ul style="list-style-type: none"> <li>• It sets general guidance criteria for the marketing of Caja Rural de Navarra's banking and investment products and services.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Social	Customer discontent with the way customer services deal with incidents.	Policy on whistle-blowing and protection of whistle-blowers	<ul style="list-style-type: none"> <li>It sets an Internal Reporting System (IRS) for all people, establishing effective internal communication channels for people who wish to report irregularities or failures of compliance.</li> </ul>
Governance	Promotion of appropriate protections for whistleblowers through measures like dissemination of the Code of Conduct and internal and external whistle-blowing channels.	Code of Conduct Policy on whistle-blowing and protection of whistle-blowers	<ul style="list-style-type: none"> <li>Establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.</li> <li>It sets an Internal Reporting System (IRS) for all people, establishing effective internal communication channels for people who wish to report irregularities or failures of compliance.</li> </ul>
Governance	No cases of corruption, bribery or money-laundering.	Anti-corruption policy	<ul style="list-style-type: none"> <li>Establishes a robust and comprehensive framework to prevent, detect, investigate and sanction any form of corruption in the Bank and its relations with third parties.</li> </ul>
Governance	Weaknesses in internal governance (standards, procedures, controls) intended to prevent crime and/or fraud.	Code of Conduct Anti-corruption policy	<ul style="list-style-type: none"> <li>Establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.</li> <li>Establishes a robust and comprehensive framework to prevent, detect, investigate and sanction any form of corruption in the Bank and its relations with third parties.</li> </ul>
Governance	Strengthen trust by markets and customers by having a robust financial crime prevention framework, including independent auditing and continuous training for all employees.	Code of Conduct	<ul style="list-style-type: none"> <li>Establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.</li> </ul>
Governance	Ensure good corporate governance by implementing standards and best practice when making investments, making sure these activities are conducted in an ethical and responsible manner.	Sustainable Finance and ESG Risks Policy	<ul style="list-style-type: none"> <li>Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> <li>Establecer un marco integral y robusto para prevenir, detectar, investigar y sancionar cualquier forma de corrupción dentro de la entidad y en sus relaciones con terceros.</li> </ul>



Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Governance	Promote best practice in corporate governance and responsible leadership through annual training programmes for members of the Governing Board.	Code of Conduct Anti-corruption policy	<ul style="list-style-type: none"> <li>• Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> </ul>
Governance	Weaknesses in the performance of senior management functions, including in areas like diversity in decision-making, equitable compensation and the quality of skills development programmes.	Código de Conducta	<ul style="list-style-type: none"> <li>• Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> </ul>
Governance	Promotion of a culture of ethical enterprise and regulatory compliance, founded on trust and transparency, that can catch possible breaches early, protect those who comply with regulations, and involve all employees in a collective endeavour.	Código de Conducta	<ul style="list-style-type: none"> <li>• Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> </ul>
Governance	Promotion of an organisational culture based on excellence, respect and proximity that can sustain and strengthen links with the community, while pursuing socially responsible economic growth.	Código de Conducta	<ul style="list-style-type: none"> <li>• Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> </ul>
Governance	Reputational damage from an inadequate corporate culture where behaviours fail to align with the Bank's internal ESG policies.	Code of Conduct	<ul style="list-style-type: none"> <li>• Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> <li>• Establece un Sistema de Información de Denuncias (IRS) para todas las personas, estableciendo canales de comunicación internos efectivos para quienes deseen reportar irregularidades o incumplimientos.</li> </ul>
Governance	Improve the corporate image through good management of corporate ethics practices (e.g. Encouraging an ethical culture and compliance with the principles in the code of conduct and the Bank's other tools in this area).	Code of Conduct Policy on whistle-blowing and protection of whistle-blowers	<ul style="list-style-type: none"> <li>• Establishes the ethical principles and rules of conduct to guide the behaviour of all Bank employees. It aims to promote a culture of integrity, transparency and responsibility.</li> <li>• It sets an Internal Reporting System (IRS) for all people, establishing effective internal communication channels for people who wish to report irregularities or failures of compliance.</li> </ul>

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Cross-cutting	Promote relationships of trust with all taxation authorities based on transparent and ongoing communications to promote voluntary compliance with tax obligations.	Management Control Procedures Handbook	<ul style="list-style-type: none"> <li>• Establece los principios éticos y las normas de conducta que deben guiar el comportamiento de todos los empleados de la Entidad. Su objetivo es fomentar una cultura de integridad, transparencia y responsabilidad.</li> <li>• Establece un Sistema de Información de Denuncias (IRS) para todas las personas, estableciendo canales de comunicación internos efectivos para quienes deseen reportar irregularidades o incumplimientos.</li> </ul>
Cross-cutting	Help improve the economic development of the Bank's environment through taxes paid.		
Cross-cutting	Exposure to legal disputes over tax as a result of poor tax management, endangering the trust of customers, suppliers and commercial partners.		
Cross-cutting	Implement a continuous improvement process for cyberattack prevention and mitigation procedures, ensuring these are up-to-date with best market practice.	<ul style="list-style-type: none"> <li>• Business Continuity Policy</li> <li>• ICT Risk Management Policy</li> <li>• Data Security Policy</li> <li>• Physical and Environmental Safety Policy</li> </ul>	
Cross-cutting	No breaches of data security or cyberattacks in the Bank (e.g. leaks of personal data)	<ul style="list-style-type: none"> <li>• Business Continuity Policy</li> <li>• ICT Risk Management Policy</li> <li>• Data Security Policy</li> <li>• Physical and Environmental Safety Policy</li> </ul>	

Block	Description of IRO	Associated policy	Policy contribution to mitigating or achieving IROs
Cross-cutting	Cybersecurity training courses and awareness-raising of the issues across the Bank.	<ul style="list-style-type: none"> <li>• Business Continuity Policy</li> <li>• ICT Risk Management Policy</li> <li>• Data Security Policy</li> <li>• Physical and Environmental Safety Policy</li> </ul>	
Cross-cutting	Reputational damage to the Bank and legal penalties for personal data leaks due to poor IT safeguarding of data.	Data Protection Governance Model	<ul style="list-style-type: none"> <li>• Define the Bank's Governance Model for data protection listing the functions and roles that will take responsibility within the Bank for control and oversight of compliance with data protection regulations.</li> </ul>
Cross-cutting	Reducing the Bank's environmental footprint through digitization, less use of paper and minimising customers' travel by making functionalities available through their digital personal manager.	General strategy of the Bank	
Cross-cutting	Extending digitisation by creating remote channels where our customers can transact more flexibly and simply (online and telephone banking).	General strategy of the Bank	
Cross-cutting	Inadequate budgeting for innovation, preventing the company identifying and seizing new business opportunities.	General strategy of the Bank	

# Annex III

## **Cross-reference table: Law 11/2018 and CSRD**

Section	Standard	Disclosure requirement (1)	Page of Report
Business model	Description of the business model including its corporate environment, its organisation and structure	ESRS 2 GOV-1	Pages 5, 14, 20, 29, 32, 33, 50
		ESRS 2 GOV-2	
		ESRS 2 GOV-3	
		ESRS 2 SBM-1	
		ESRS 2 SBM-2	
		ESRS 2 SBM-3	
		ESRS E1-GOV-3	
	Markets where the Bank operates	ESRS 2 SBM-1	Page 29
	Targets and strategy of the organization	ESRS 2 SBM-1	Page 29
		ESRS 2 MDR-T	
	Key factors and trends affecting future performance	ESRS 2 SBM-1	Pages 29, 32, 33
		ESRS 2 SBM-2	
		ESRS 2 SBM-3	
Reporting framework used	ESRS 2 BP-1	Page 4, 6	
	ESRS 2 BP-2		
Materiality principle	ESRS 2 SBM-3	Page 48, 49, 63, 94	
	ESRS 2 IRO-1		
	ESRS 2 IRO-2		
	ESRS S1-SBM-3		
Key risks and incidents	Management approach: policy and risks	ESRS 2 GOV-5	Page 31, 48, 49, 63
		ESRS 2 SBM-3	
		ESRS 2 IRO-1	
		ESRS 2 IRO-2	
		ESRS 2 MDR-T	
Environmental information			
Environmental management	Management approach: Policies and risks	ESRS E1-2	Page 69
		ESRS 2 MDR-T	
		ESRS 2 MDR-T	
		GRI 3-3	

Section	Standard	Disclosure requirement (1)	Page of Report
Environmental management	Current and foreseeable impacts of activities of the company and the environment and, where applicable, health and safety	ESRS E1-SBM-3	Page 65, 69
		ESRS E1-1	
		GRI 3-3	
	Environmental assessment or certification procedures	ESRS E1-IRO-1	Page 68, 85, 89, 90, 91
		ESRS E2-IRO-1	
		ESRS E3-IRO-1	
		ESRS E4-IRO-1	
		ESRS E5-IRO-1	
		GRI 3-3	
	Resources dedicated to prevent environmental risks	ESRS E1-3	Page 71, 73
		ESRS E1-8	
		ESRS E1-4	
		ESRS 2-MDR-A	
	Application of precautionary principle	GRI 3-3	Page 65, 69, 71, 73
		ESRS 2-MDR-P	
		ESRS 2-MDR-A	
		ESRS 2-MDR-M	
	Provisions and guarantees for environmental risks	ESRS 2-MDR-T	
		ESRS E1-1	Page 69, 71, 73, 81
		ESRS E1-3	
		ESRS E1-7	
		ESRS 2-MDR-A	
		ESRS 2-MDR-M	
Pollution	Measures to prevent, reduce or remediate emissions that severely impact the environment; including any type of atmospheric pollution specific to an activity, including noise and light pollution.	ESRS E2-IRO-1	Page 85
Circular economy and waste prevention	Measures of prevention, recycling, reuse, other forms of waste recovery and elimination	ESRS E5-IRO-1	Page 91
	Actions to prevent food waste	Immaterial	



Section	Standard	Disclosure requirement (1)	Page of Report
Sustainable resource use	Water consumption and water supply in line with local limits	ESRS E3-IRO-1	Page 89
	Consumption of raw materials and measures to use them more efficiently	ESRS E5-IRO-1	Page 91
	Direct and indirect energy consumption	ESRS E1- 5	Page 74
	Measures to improve energy efficiency	ESRS E1-3 ESRS 2-MDR-A	Page 71
	Use of renewable energy	ESRS E1- 5	Page 74
Climate Change	Key factors in greenhouse gas emissions generated as a result of the company's activities, including use of the goods and services it produces	ESRS E1- 6 ESRS E1-7 ESRS 2-MDR-M	Page 74, 81
	Climate change adaptation measures	ESRS E1- 6 ESRS E1-7	Page 73
	Voluntary medium- and long-term targets to reduce greenhouse gas emissions and measures taken to achieve this	ESRS E1-4 ESRS 2-MDR-T	Page 73
Biodiversity	Measures to preserve or restore biodiversity	ESRS E4-IRO-1	Page 90
	Incidents caused by activities or operations in protected areas	N/A	
<b>Information on the company and workforce</b>			
Employment	Management approach: Policies and risks	ESRS S1-1 ESRS 2-MDR-P	Page 97
	Headcount and breakdown by diversity criteria (gender, age, country, etc.)	ESRS S1- 6 ESRS S1-7 ESRS S1-9 ESRS 2-MDR-M GRI 2-7, 405-1	Page 104, 110, 112
	Total number and breakdown of types of employment contract, annual average permanent, temporary and part-time contracts by gender, age and professional classification	ESRS S1- 6 ESRS 2-MDR-M GRI 2-7, 405-1	Page 104
	Departures by gender, age, country and professional classification	ESRS S1- 6 ESRS 2-MDR-M GRI 401-1	Page 104

Section	Standard	Disclosure requirement (1)	Page of Report
Employment	Average remuneration and change by gender, age and professional classification or equal value	ESRS S1-10 ESRS 2-MDR-M ESRS S1-16 GRI 405-2	Page 113, 123
	Pay gap, remuneration for equivalent jobs or company average	ESRS 2-MDR-M ESRS S1-16	Page 123
	Average remuneration of directors and managers, including variable remuneration, directors' fees, compensation and payments to long-term prudential arrangements and any other payments broken down by gender	ESRS 2-MDR-M ESRS 2-GOV-3 ESRS E1-GOV-3	Page 30, 65, 127
	Introduction of right to disconnect policies	ESRS S1-1 ESRS 2-MDR-P	Page 97
	employees with disabilities	ESRS S1-12	Page 115
	Organisation of working time	ESRS 2-MDR-A ESRS 2-MDR-T ESRS S1-4 ESRS S1-5	Page 102, 103
	Organisation of working time	ESRS S1-14 ESRS 2-MDR-M GRI 403-9 GRI 403-10	Page 120
	Measures to promote work-life balance and promote shared responsibility by both parents	ESRS S1-15 ESRS 2-MDR-A ESRS S1-4	Page 121 , 102
	Conditions for health and safety at work	ESRS S1-14	Page 120
	Workplace accidents, including frequency and severity and professional illnesses, broken down by gender	ESRS S1-14 ESRS 2-MDR-M	Page 120

Section	Standard	Disclosure requirement (1)	Page of Report
Employee relations	Organisation of social dialogue with employees, including procedures to inform and consult and negotiate with employees	ESRS S1-2 ESRS S1-8	Page 98, 108
	Percentage of employees covered by collective agreement, by country	ESRS S1-8	Page 108
	Summary of collective agreements, particularly health and safety at work	ESRS S1-8	Page 108
	Mechanism and procedure to promote employee involvement in management, including information, consultation and participation	ESRS S1-SBM-2 ESRS S1-2 ESRS S1-3 ESRS S1-8	Page 94, 98, 100, 108
	Policies implemented in the field of training	NEIS S1-1 NEIS 2-MDR-P NEIS S1-13	Page 97, 115
Training	Total number of training hours by professional category	NEIS S1-13 NEIS-2-MDR-M GRI 404-1	Page 115
Universal access	Universal access for people with disabilities	NEIS 2-MDR-A NEIS S1-4 NEIS S1-12	Page 102,
Equality	Measures to promote equal treatment and opportunities between genders	NEIS 2-MDR-A NEIS S1-4 NEIS S1-9	Page 102,
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, on effective equality between women and men), measures to promote employment, protocols against sexual and gender-based harassment, inclusion and universal access for people with disabilities	NEIS 2-MDR-A NEIS S1-4 NEIS S1-9	Page 102, 112
	Policy against all forms of discrimination and, where applicable, diversity management	NEIS S1-1 NEIS 2-MDR-P	Page 97

Section	Standard	Disclosure requirement (1)	Page of Report
Human rights	Management approach: Policies and risks	ESRS S1-1 ESRS 2-MDR-P	Page 97
	Application of human rights due diligence procedures; measures to prevent risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy any abuses	ESRS 2 GOV-4	Page 31
	Complaints of human rights violations	ESRS S1- 17	Page 127
	Promotion and compliance with the fundamental Conventions of the International Labour Organisation on Freedom of Association and Protection of the Right to Organise and Collective Bargaining; freedom from discrimination at work; elimination of forced or compulsory labour; the effective abolition of child labour	ESRS S1-1 ESRS 2-MDR-P ESRS S1- 17	Page 97, 127
	Management approach: Policies and risks	ESRS MDR-P ESRS G1-1	Page 164
Corruption and bribery	Measures taken to prevent corruption and bribery	ESRS MDR-P ESRS MDR-A ESRS MDR-M ESRS MDR-T ESRS G1-1 ESRS G1-3 ESRS G1-4	Page 164, 175
	Measures to combat money laundering	ESRS G1-3 ESRS MDR-A ESRS G1-4 ESRS MDR-M	Page 175
	Contributions to foundations and non-profit organisations	ESRS MDR-M GRI 413.1	Page 182, 186

Section	Standard	Disclosure requirement (1)	Page of Report
<b>Information on company</b>			
Corporate commitment to sustainable development	Management approach: policies and risks	ESRS S3-1 ESRS 2-MDR-P	Page 137
	The impact of the company's activity on employment and local development	ESRS S3-SBM2 ESRS S3-SBM3	Page 129, 134, 138, 139, 141
		ESRS S3-S2 ESRS S3-3 ESRS S3-4 ESRS S3-5	
		ESRS S3-SBM2 ESRS S3-SBM3	
		ESRS S3-S2 ESRS S3-3 ESRS S3-4 ESRS S3-5	
	The impact of the company's activity on local communities and the territory	ESRS S3-S2 ESRS S3-3 ESRS S3-4 ESRS S3-5	Page 129, 134, 138, 139, 141
	Relations with local community stakeholders and the nature of dialogue with them	ESRS S3-S2	Page 129
	Philanthropy and sponsorship	N/A	
	Inclusive purchasing policy for social, gender equality and environmental issues	ESRS G1-1 ESRS S1-1 ESRS 2-MDR-P	Page 164, 97
		ESRS G1-1 ESRS 2-MDR-P	Page 164
		N/A	
Consumers	Consumer health and safety measures	ESRS 2-MDR-A ESRS S3-4	Page 160
	Claims systems, complaints received and resolved	ESRS S3-3	Page 138
Tax information	Profits by country	GRI 201-1	Page 183
	Income tax paid	GRI 201-1 GRI 207-4	Page 183
	Public subsidies received	GRI 201-4	Page 183

# Annex IV

**Cross-reference table:  
List of datapoints in  
cross-cutting and topical  
standards that derive from  
other EU legislation**



Disclosure requirement and related datapoint	SFDR reference	Pillar III reference	Benchmark Regulation reference	EU Climate Law reference
<b>ESRS 2 GOV-1</b> Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS 2 GOV-1</b> Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS 2 GOV-4</b> Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1			
<b>ESRS 2 SBM-1</b> Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013 Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS 2 SBM-1</b> Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS 2 SBM-1</b> Involvement in activities related to chemical production paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS 2 SBM-1</b> Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS E1-1</b> Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)
<b>ESRS E1-1</b> Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		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 a	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2	

Disclosure requirement and related datapoint	SFDR reference	Pillar III reference	Benchmark Regulation reference	EU Climate Law reference
<b>ESRS E1-4</b> GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
<b>ESRS E1-5</b> Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			
<b>ESRS E1-5</b> Consumo y combinación energéticos apartado 37	Indicator number 5 Table #1 of Annex 1			
<b>ESRS E1-5</b> Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1			
<b>ESRS E1-6</b> Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	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	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
<b>ESRS E1-</b> Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
<b>ESRS E1-7</b> GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)
<b>ESRS E1-9</b> Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
<b>NEIS E1-9</b> Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		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.		
<b>NEIS E1-9</b> Location of significant assets at material physical risk paragraph 66 (c).				

Disclosure requirement and related datapoint	SFDR reference	Pillar III reference	Benchmark Regulation reference	EU Climate Law reference
<b>ESRS E1-9</b> Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		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		
<b>ESRS E1-9</b> Degree of exposure of the portfolio to climate-related			Delegated Regulation (EU) 2020/1818, Annex II	
<b>ESRS E2-4</b> Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
<b>ESRS E3-1</b> Water and marine resources paragraph	Indicator number 7 Table #2 of Annex 1			
<b>ESRS E3-1</b> Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1			
<b>ESRS E3-1</b> Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1			
<b>ESRS E3-4</b> Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1			
<b>ESRS E3-4</b> Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1			
<b>ESRS 2 - IRO 1 - E4</b> paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1			
<b>ESRS 2 - IRO 1 - E4</b> paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1			
<b>ESRS 2 - IRO 1 - E4</b> paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1			
<b>ESRS E4-2</b> Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1			

Disclosure requirement and related datapoint	SFDR reference	Pillar III reference	Benchmark Regulation reference	EU Climate Law reference
<b>ESRS E4-2</b> Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1			
<b>ESRS E4-2</b> Policies to address deforestation paragraph 24 (d)	Indicador nº 15 del cuadro 2 del anexo 1			
<b>ESRS E5-5</b> Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1			
<b>ESRS E5-5</b> Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1			
<b>ESRS 2 - SBM3 - S1</b> Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I			
<b>ESRS 2 - SBM3 - S1</b> Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I			
<b>ESRS S1-1</b> Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I			
<b>ESRS S1-1</b> Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS S1-1</b> processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I			
<b>ESRS S1-1</b> workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I			
<b>ESRS S1-3</b> Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I			
<b>ESRS S1-14</b> Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	

Disclosure requirement and related datapoint	SFDR reference	Pillar III reference	Benchmark Regulation reference	EU Climate Law reference
<b>ESRS S1-14</b> Number of days lost to injuries, accidents, fatalities or illness	Indicator number 1 Table #3 of Annex I			
<b>ESRS S1-16</b> Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS S1-16</b> Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I			
<b>ESRS S1-17</b> Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I			
<b>ESRS S1-17.</b> Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
<b>ESRS 2 - SBM3 - S2</b> Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I			
<b>ESRS S2-1</b> Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
<b>ESRS S2-1</b> Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1			
<b>ESRS S1-1.</b> Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
<b>ESRS S2-1</b> Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II	
<b>ESRS S2-4</b> Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1			

Disclosure requirement and related datapoint	SFDR reference	Pillar III reference	Benchmark Regulation reference	EU Climate Law reference
<b>ESRS S3-1</b> Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1			
<b>ESRS S3-1</b> non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
<b>ESRS S3-4</b> Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1			
<b>ESRS S4-1</b> Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1			
<b>ESRS S4-1</b> Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
<b>ESRS S4-4</b> Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1			
<b>ESRS G1-1</b> United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1			
<b>ESRS G1-1</b> Protection of whistleblowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1			
<b>ESRS G1-4</b> Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)	
<b>ESRS G1-4</b> Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1			



# Annex V

**Datapoints included  
in Law 11/2018 not  
mapped to the CSRD**

Standard	Disclosure requirement	ESRS description	Page of Report
ESRS 2	BP-1	General basis for preparation of the sustainability statement	-
ESRS 2	BP-2	Disclosures in relation to specific circumstances	-
ESRS 2	GOV-1	The role of the administrative, management, and supervisory bodies	-
ESRS 2	GOV-2	Information provided to administrative, management and supervisory bodies and sustainability issues addressed by them	-
ESRS 2	GOV-3	Integration of sustainability-related performance in incentive schemes	-
ESRS 2	GOV-4	Statement on due diligence	-
ESRS 2	GOV-5	Risk management and internal controls over sustainability reporting	-
ESRS 2	SBM-1	Strategy, business model and value chain	-
ESRS 2	SBM-2	Interests and views of stakeholders	-
ESRS 2	SBM-3	Material IROs and their interaction with strategy and business model	-
ESRS 2	IRO-1	Description of the process to identify and assess material IROS	-
ESRS 2	IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	-
ESRS E1	E1-GOV 3	Integration of sustainability-related performance in incentive schemes	-
ESRS E1	E1-SBM 3	Material IROs and their interaction with strategy and business model.	-
ESRS E1	E1-IRO 1	Description of the process to identify and assess material impacts, risks and opportunities related to the climate.	-
ESRS E1	E1-1	Transition plan for climate change mitigation.	-
ESRS E1	E1-2	Policies related to climate change mitigation and adaptation.	-
ESRS E1	E1-3	Actions and resources in relation to climate change policies.	-
ESRS E1	E1-4	Targets related to climate change mitigation and adaptation.	-
ESRS E1	E1-5	Energy consumption and mi.X	-
ESRS E1	E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions.	-
ESRS E1	E1-7	GHG removals and GHG mitigation projects financed through carbon credits	-
ESRS E1	E1-8	Internal carbon pricing	-
ESRS E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities.	-
ESRS E2	E2-IRO 1	Description of the process to identify and assess material IROs related to pollution.	-

Standard	Disclosure requirement	ESRS description	Page of Report
ESRS E3	E3-IRO 1	Description of the process to identify and assess material IROs related to water and marine resources	-
ESRS E4	E4-IRO 1	Description of the process to identify and assess material IROs and dependencies related to biodiversity and ecosystems	-
ESRS E5	E5-IRO 1	Description of the process to identify and assess material IROs and dependencies related to the circular economy	-
ESRS S1	S1-SBM-2	Interests and views of stakeholders	-
ESRS S1	S1-SBM-3	Material IROs and their interaction with strategy and business model	-
ESRS S1	S1-1	Policies related to own workforce	-
ESRS S1	S1-2	Processes for engaging with own workforce and workers' representatives about impacts	-
ESRS S1	S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	-
ESRS S1	S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	-
ESRS S1	S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-
ESRS S1	S1-6	Characteristics of the undertaking's employees	-
ESRS S1	S1-7	Characteristics of non-employees in the undertaking's own workforce	-
ESRS S1	S1-8	Collective bargaining coverage and social dialogue	-
ESRS S1	S1-9	Diversity metrics	-
ESRS S1	S1-10	Adequate wages	-
ESRS S1	S1-11	Social protection	-
ESRS S1	S1-12	Percentage of employees with disabilities	-
ESRS S1	S1-13	Training and skills development	-
ESRS S1	S1-14	Health and safety	-
ESRS S1	S1-15	Work-life balance	-
ESRS S1	S1-16	Remuneration metrics (pay gap and total remuneration)	-
ESRS S3	S3-SBM-2	Interests and views of stakeholders	-
ESRS S3	S3-SBM-3	Material IROs and their interaction with strategy and business model	-
ESRS S3	S3-1	Policies related to affected communities	-
ESRS S3	S3-2	Processes for engaging with affected communities about impacts	-

Standard	Disclosure requirement	ESRS description	Page of Report
ESRS S3	S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	-
ESRS S3	S3-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	-
ESRS S3	S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-
ESRS S4	S4-SBM-2	Interests and views of stakeholders	-
ESRS S4	S4-SBM-3	Material IROs and their interaction with strategy and business model	-
ESRS S4	S4-1	Policies related to consumers and end-users	-
ESRS S4	S4-2	Processes for engaging with consumers and end-users about impacts	-
ESRS S4	S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	-
ESRS S4	S4-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	-
ESRS S4	S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	-
ESRS G1	G1-GOV-1	The role of the administrative, management, and supervisory bodies	-
ESRS G1	G1-IRO-1	Description of the process to identify and assess material IROS	-
ESRS G1	G1-1	Business conduct policies and corporate culture	-
ESRS G1	G1-3	Prevention and detection of corruption and bribery	-
ESRS G1	G1-4	Incidents of corruption or bribery	-
ESRS G1	G1-5	Political influence and lobbying activities	-

# Annex VI

## **Revenue by sector**

Sector/ Subsector	Carrying amount (€)					
	Total	Medium-sized company	Large company	Small company	Micro-enterprise	Sole trader
	100%	30%	31%	16%	15%	8%
<b>1 A) BY CNAE CODE (010)</b>						
<b>2 Agriculture, livestock, forestry and fisheries (020)</b>	<b>295,602,529.71</b>	<b>60,182,424.01</b>	<b>46,685,309.79</b>	<b>22,366,487.08</b>	<b>50,672,903.67</b>	<b>115,695,405.16</b>
3 Agriculture, livestock, hunting and forestry (030)	279,744,694.42	60,182,424.01	30,827,900.44	22,366,257.18	50,672,729.56	115,695,383.23
4 Fishing (040)	15,857,835.29	0.00	15,857,409.35	229.90	174.11	21.93
<b>5 Extractive industries (050)</b>	<b>4,544,141.11</b>	<b>1,694,701.46</b>	<b>42,694.13</b>	<b>1,844,065.81</b>	<b>872,645.61</b>	<b>90,034.10</b>
<b>6 Manufacturing industries (060)</b>	<b>1,235,215,806.03</b>	<b>319,928,392.15</b>	<b>571,963,487.81</b>	<b>236,708,592.24</b>	<b>87,349,308.06</b>	<b>19,266,025.77</b>
7 Food, beverage and tobacco industries (070)	436,428,067.68	86,338,638.56	235,262,904.40	67,873,272.45	42,319,468.06	4,633,784.21
8 Oil refining (080)	6,814,725.56	0.00	6,764,512.58	0.00	0.00	50,212.98
9 Chemicals industry (090)	23,076,050.80	14,578,366.34	746,760.41	5,550,994.25	1,506,666.51	693,263.29
10 Glass, ceramics and construction materials (100)	25,331,593.54	7,927,615.44	4,007,792.12	9,796,859.62	3,168,056.61	431,269.75
11 Metallurgy and manufacture of metal products, construction of machinery and equipment, materials and electric, electronic and optical equipment (110)	483,190,172.14	149,047,007.20	195,488,439.34	107,857,819.08	24,546,088.96	6,250,817.55
12 Manufacture of transport equipment (120)	106,650,836.42	23,443,198.19	74,634,075.06	6,775,422.81	1,582,120.36	216,020.00
13 Other manufacturing industries (130)	153,724,359.89	38,593,566.42	55,059,003.89	38,854,224.03	14,226,907.56	6,990,657.99
<b>14 Supply of electricity, gas, steam and air-conditioning (140)</b>	<b>140,451,591.42</b>	<b>23,921,086.34</b>	<b>81,076,140.58</b>	<b>14,912,928.67</b>	<b>19,463,268.64</b>	<b>1,078,167.19</b>
<b>15 Water supply (150)</b>	<b>26,147,055.52</b>	<b>12,831,224.69</b>	<b>6,689,090.27</b>	<b>4,957,135.50</b>	<b>1,581,080.30</b>	<b>88,524.76</b>
<b>16 Construction (160)</b>	<b>592,841,715.46</b>	<b>224,781,247.89</b>	<b>155,809,538.36</b>	<b>58,060,446.28</b>	<b>142,748,442.21</b>	<b>11,442,040.72</b>
17 Construction (excluding property development) (170)	331,214,759.19	90,671,741.87	120,303,830.10	55,778,430.84	53,268,844.59	11,191,911.79
18 Buildings and individual civil engineering works, coverings and enclosure structures (180)	165,505,935.35	65,902,335.35	27,834,216.76	31,460,732.39	36,103,210.26	4,205,440.59
19 Of which: building construction (190)	130,624,758.52	56,469,293.42	22,154,806.04	22,652,106.14	25,579,141.75	3,769,411.17
20 Motorways, highways, runways, railways and sports centres; hydraulic works; other specialised constructions (200)	42,407,659.79	5,001,797.69	33,313,050.94	2,882,991.62	773,725.84	436,093.70
21 Installations and finishing of buildings and works (210)	109,488,661.66	13,820,295.58	59,100,885.13	16,927,634.88	13,581,085.63	6,058,760.44
22 Site preparation (220)	13,812,502.39	5,947,313.25	55,677.27	4,507,071.95	2,810,822.86	491,617.06
23 Real estate development	261,626,956.27	134,109,506.02	35,505,708.26	2,282,015.44	89,479,597.62	250,128.93
<b>24 Wholesale and retail sale of vehicles and repair (240)</b>	<b>522,298,798.40</b>	<b>149,343,456.58</b>	<b>128,216,109.82</b>	<b>117,009,397.99</b>	<b>80,718,571.66</b>	<b>47,011,262.34</b>
<b>25 Transport and warehousing (250)</b>	<b>223,620,576.09</b>	<b>61,779,378.19</b>	<b>66,834,390.13</b>	<b>49,112,493.29</b>	<b>23,728,981.45</b>	<b>22,165,333.03</b>



Sector/ Subsector		Carrying amount (€)					
		Total	Medium-sized company	Large company	Small company	Micro-enterprise	Sole trader
		100%	30%	31%	16%	15%	8%
26	Hospitality (260)	174,537,835.96	37,021,407.46	9,730,658.57	52,212,866.97	42,483,512.47	33,089,390.49
27	Information and communications (270)	29,010,494.08	12,440,844.06	3,618,177.96	5,886,790.37	5,707,271.60	1,357,410.09
28	Property (280)	274,772,814.67	107,020,959.19	44,400,504.60	20,939,792.85	100,298,457.40	2,113,100.63
29	Professionals, scientific and technical (i) (290)	269,698,200.93	50,824,586.56	136,593,918.82	28,305,189.29	45,713,974.70	8,260,531.56
30	Administration and support services (300)	84,154,481.75	27,511,469.40	25,267,246.76	17,996,486.02	11,116,596.17	2,262,683.40
31	Public administration and defence, mandatory social security (310)	74,792.05	0.00	0.00	3.06	0.00	74,788.99
32	Education (320)	31,852,702.84	16,993,611.91	1,650,136.45	6,487,561.18	3,594,530.21	3,126,863.09
33	Health and social services (330)	49.760.681,08	11.867.884,70	13.079.619,11	10.831.387,97	5.343.899,77	8.637.889,53
34	Artistic creation, recreation and entertainment (340)	32.814.839,23	13.207.177,69	2.258.683,04	5.178.635,58	9.564.619,26	2.605.723,66
35	Other services (350)	21.661.462,24	2.889.489,17	267.505,60	3.984.151,10	5.901.541,95	8.618.774,42
36	Unclassified (j) (360)	18.830.283,50	202.866,95	2.721,93	685.201,53	199.987,60	17.739.505,49
37	<b>B) BY PURPOSE (370)</b>						
38	Construction and real-estate development (including land) (380)	197.819.701,11	90.478.398,91	22.378.104,43	16.050.051,02	68.404.921,54	508.225,21
39	Of which: construction sector (excluding real estate development) (390)	27.643.163,23	10.861.394,84	2.371.735,85	7.122.316,31	7.241.842,05	45.874,18
40	Of which: real estate development (400)	119.670.724,30	63.394.447,58	17.612.237,84	185.086,58	38.403.638,26	75.314,04
41	Civil engineering (410)	23.713.944,15	8.870.192,83	10.782.989,91	1.888.257,11	2.171.869,78	634,52
42	Of which: construction sector (excluding real estate development) (420)	19.246.508,67	8.870.153,16	8.934.093,37	1.345.239,93	97.022,21	0
43	Of which: real estate development (430)	69.959,97	17,79	0	0	69.942,18	0
44	Renewable energy generation (440)	0	0	0	0	0	0
45	Other purposes (450)	3.806.357.156,81	1.035.093.616,67	1.261.024.839,38	639.541.304,65	566.482.801,41	304.214.594,69
46	<b>TOTAL (460)</b>	<b>4.027.890.802,07</b>	<b>1.134.442.208,41</b>	<b>1.294.185.933,72</b>	<b>657.479.612,78</b>	<b>637.059.592,73</b>	<b>304.723.454,42</b>

# Annex VII

**Specific data  
required by Law  
11/2018**

## OWN WORKFORCE DATA

As the Caja Rural de Navarra Group operates in a wide range of sectors, with different collective agreements, the tables below contains aggregate (Group-wide) or sector data for 2024 and 2023, using the calculation parameters stated in each table.

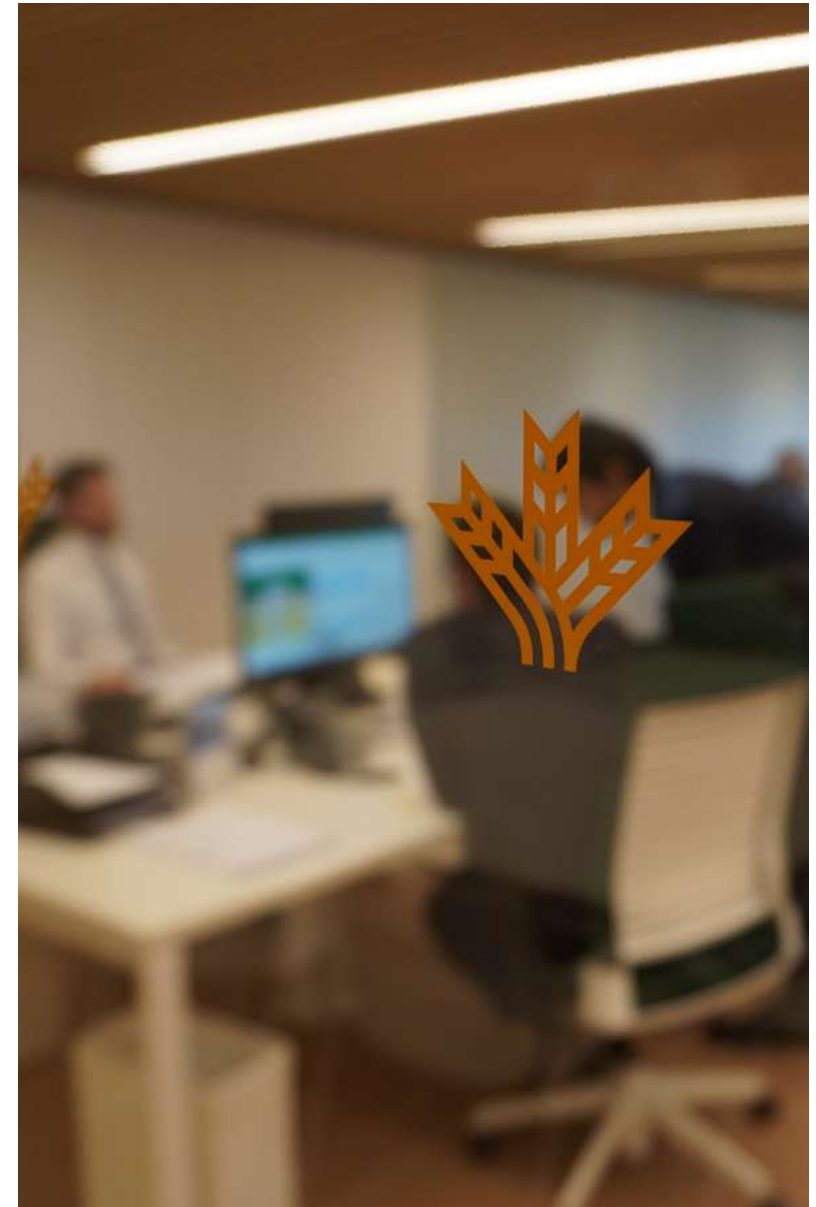
### 1. Annual headcount by contract type and gender

No. of contracts by gender	2024								
	Caja Rural de Navarra			Subsidiaries			Total		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent (001, 100, 1xx)	461	492	953	159	296	455	620	788	1408
Temporary (410)	6	12	18	0	0	0	6	12	18
Internship (420 and 450)	40	36	76	0	0	0	40	36	76
Fixed-term work or services (401)	0	0	0	16	118	134	16	118	134
Other (402)	2	4	6	0	2	2	2	6	8
Part-time (5xx)	0	0	0	12	92	104	12	92	104
<b>Total</b>	<b>509</b>	<b>544</b>	<b>1053</b>	<b>187</b>	<b>508</b>	<b>695</b>	<b>696</b>	<b>1052</b>	<b>1748</b>

No. of contracts by gender	2023								
	Caja Rural de Navarra			Subsidiaries			Total		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent (001, 100, 1xx)	443	455	898	149	282	431	592	737	1329
Temporary (410)	7	8	15	0	0	0	7	8	15
Internship (420 and 450)	42	52	94	0	0	0	42	52	94
Fixed-term work or services (401)	0	0	0	22	103	125	22	103	125
Other (402)	0	0	0	0	2	2	0	2	2
Part-time (5xx)	0	0	0	0	61	61	0	61	61
<b>Total</b>	<b>492</b>	<b>515</b>	<b>1007</b>	<b>171</b>	<b>448</b>	<b>619</b>	<b>663</b>	<b>963</b>	<b>1626</b>

### 2. Annual headcount by age and gender

	2024				2023			
	CRN (parent)	Subsidiaries	Consolidated	%	CRN (parent)	Subsidiaries	Consolidated	%
Over 50	148	288	436	20.61%	131,00	209,00	340	18.64%
30 to 50	575	511	1086	51.35%	578	404	982	53.84%
Under 30	330	263	593	28.04%	298	204	502	27.52%
<b>Total</b>	<b>1053</b>	<b>695</b>	<b>1748</b>	<b>100%</b>	<b>1007</b>	<b>619</b>	<b>1626</b>	<b>100%</b>



### 3. Types of contract, age pyramid, contract types and gender

#### 3.1. CAJA RURAL DE NAVARRA

Parent company figures are at year-end:

Breakdown of no. of contracts	2024						
	Perma- nent	Tempo- rary	Interns- hip	Fixed-term work or services	Other	Part-ti- me	Total
<b>Branch management and Central Services and JZ</b>	<b>252</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>252</b>
Over 50	63	0	0	0	0	0	63
30 to 50	181	0	0	0	0	0	181
Under 30	8	0	0	0	0	0	8
Central Services engineers	119	0	0	0	0	0	119
Over 50	23	0	0	0	0	0	23
30 to 50	87	0	0	0	0	0	87
Under 30	9	0	0	0	0	0	9
<b>Sales managers and CS administrative staff</b>	<b>579</b>	<b>18</b>	<b>76</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>679</b>
Over 50	60	0	0	0	0	0	60
30 to 50	304	0	0	0	2	0	306
Under 30	215	18	76	0	4	0	313
Messengers and telephonists	3	0	0	0	0	0	3
Over 50	2	0	0	0	0	0	2
30 to 50	1	0	0	0	0	0	1
Under 30	0	0	0	0	0	0	0
<b>Total</b>	<b>953</b>	<b>18</b>	<b>76</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>1053</b>

Breakdown of no. of contracts	2023						
	Perma- nent	Tempo- rary	Interns- hip	Fixed-term work or services	Other	Part-ti- me	Total
<b>Branch management and Central Services and JZ</b>	<b>279</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>279</b>
Over 50	67	0	0	0	0	0	67
30 to 50	207	0	0	0	0	0	207
Under 30	5	0	0	0	0	0	5
Central Services engineers	96	0	1	0	0	0	97
Over 50	11	0	0	0	0	0	11
30 to 50	79	0	0	0	0	0	79
Under 30	6	0	1	0	0	0	7
<b>Sales managers and CS administrative staff</b>	<b>521</b>	<b>15</b>	<b>92</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>628</b>
Over 50	51	0	0	0	0	0	51
30 to 50	291	0	1	0	0	0	292
Under 30	179	15	91	0	0	0	285
Messengers and telephonists	3	0	0	0	0	0	3
Over 50	2	0	0	0	0	0	2
30 to 50	1	0	0	0	0	0	1
Under 30	0	0	0	0	0	0	0
<b>Total</b>	<b>899</b>	<b>15</b>	<b>93</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1007</b>

#### 3.2. Equity investments

The companies carried by the Group as equity investments (subsidiaries) employ a greater number of employees. The tables below therefore give total metrics plus a breakdown by sector including everyone in the workforce during the year, i.e., a person who worked more than one period or for more than one company in the same sector is only counted once.

People who worked for Group companies in two different sectors are not counted.

#### A) WORKFORCE BY AGE AND GENDER

Total workforce in subsidiaries	2024				2023			
	Men	%	Women	%	Men	%	Women	%
Over 60	9	0.8%	49	4.6%	12	1.4%	31	3.7%
51 to 60 years	56	5.3%	174	16.4%	47	5.6%	124	14.8%
41 to 50	55	5.2%	204	19.2%	53	6.3%	159	19.0%
31 to 40	74	7.0%	178	16.8%	59	7.0%	149	17.8%
Under 30	61	5.7%	202	19.0%	43	5.1%	162	19.3%
<b>Total</b>	<b>255</b>	<b>24.0%</b>	<b>807</b>	<b>76.0%</b>	<b>214</b>	<b>25.5%</b>	<b>625</b>	<b>74.5%</b>

Breakdown of workforce at Group subsidiaries by age and gender:

Cereals sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
Over 60	2	2.7%	0	0.0%	2	2.9%	0	0.0%
51 to 60 years	8	10.8%	1	1.4%	9	12.9%	0	0.0%
41 to 50	9	12.2%	4	5.4%	10	14.3%	4	5.7%
31 to 40	23	31.1%	7	9.5%	16	22.9%	8	11.4%
Under 30	15	20.3%	5	6.8%	14	20.0%	7	10.0%
<b>Total</b>	<b>57</b>	<b>77.0%</b>	<b>17</b>	<b>23.0%</b>	<b>51</b>	<b>72.9%</b>	<b>19</b>	<b>27.1%</b>

Care sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
Over 60	2	0.2%	49	5.8%	3	0.5%	31	5.0%
51 to 60 years	20	2.4%	163	19.4%	11	1.8%	115	18.6%
41 to 50	16	1.9%	171	20.4%	15	2.4%	132	21.4%
31 to 40	33	3.9%	160	19.1%	20	3.2%	129	20.9%
Under 30	34	4.1%	191	22.8%	19	3.1%	143	23.1%
<b>Total</b>	<b>105</b>	<b>12.5%</b>	<b>734</b>	<b>87.5%</b>	<b>68</b>	<b>11.0%</b>	<b>550</b>	<b>89.0%</b>

Winery supplies sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
Over 60	5	4.8%	0	0.0%	7	6.3%	0	0.0%
51 to 60 years	27	25.7%	5	4.8%	26	23.2%	4	3.6%
41 to 50	23	21.9%	13	12.4%	24	21.4%	12	10.7%
31 to 40	15	14.3%	7	6.7%	18	16.1%	7	6.3%
Under 30	10	9.5%	0	0.0%	10	8.9%	4	3.6%
<b>Total</b>	<b>80</b>	<b>76.2%</b>	<b>25</b>	<b>23.8%</b>	<b>85</b>	<b>75.9%</b>	<b>27</b>	<b>24.1%</b>

Financial services sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
Over 60	0	0.0%	0	0.0%	0	0.0%	0	0.0%
51 to 60 years	1	2.3%	5	11.4%	1	2.6%	5	0.0%
41 to 50	7	15.9%	16	36.4%	4	0.0%	11	10.3%
31 to 40	3	6.8%	4	9.1%	5	7.7%	5	5.1%
Under 30	2	4.5%	6	13.6%	0	0.0%	8	17.9%
<b>Total</b>	<b>13</b>	<b>29.5%</b>	<b>31</b>	<b>70.5%</b>	<b>10</b>	<b>25.6%</b>	<b>29</b>	<b>74.4%</b>

## B) WORKFORCE BY CONTRACT TYPE

Total workforce in subsidiaries	2024				2023			
	Men	%	Women	%	Men	%	Women	%
F/T permanent	174	16.4%	321	30.2%	150	17.9%	270	32.2%
P/T temporary or fixed-term	22	2.1	142	13.4%	16	1.9%	136	16.2%
Internship, training or apprenticeship	1	0.1%	1	0.1%	1	0.1%	1	0.1%
Temporary contract (maternity leave, sick leave or leave for political activity)	12	1.1%	54	5.1%	15	1.8%	101	12.0%
F/T temporary contract for work or services	28	2.6%	101	9.5%	27	3.2%	51	6.1%
P/T temporary contract for work or services	18	1.7%	188	17.7%	5	0.6%	66	7.9%
<b>Total</b>	<b>255</b>	<b>24.0%</b>	<b>807</b>	<b>76.0%</b>	<b>214</b>	<b>25.5%</b>	<b>625</b>	<b>74.5%</b>

Breakdown of workforce at Group subsidiaries

Cereals sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
F/T permanent	55	74.3%	17	23.0%	49	70.0%	18	25.7%
P/T temporary or fixed-term	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Internship, training or apprenticeship	0	0.0%	0	0.0%	1	1.4%	0	0.0%
Temporary contract (maternity leave, sick leave or leave for political activity)	0	0.0%	0	0.0%	0	0.0%	1	1.4%
F/T temporary contract for work or services	2	2.7%	0	0.0%	1	1.4%	0	0.0%
P/T temporary contract for work or services	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>57</b>	<b>77.0%</b>	<b>17</b>	<b>23.0%</b>	<b>51</b>	<b>72.9%</b>	<b>19</b>	<b>27.1%</b>

Care sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
F/T permanent	33	3.9%	252	30.0%	22	3.6%	206	33.3%
P/T temporary or fixed-term	22	2.6%	140	16.7%	16	2.6%	132	21.4%
Internship, training or apprenticeship	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Temporary contract (maternity leave, sick leave or leave for political activity)	11	1.3%	54	6.4%	14	2.3%	100	16.2%
F/T temporary contract for work or services	21	2.5%	100	11.9%	11	1.8%	46	7.4%
P/T temporary contract for work or services	18	2.1%	188	22.4%	5	0.8%	66	10.7%
<b>Total</b>	<b>105</b>	<b>12.5%</b>	<b>734</b>	<b>87.5%</b>	<b>68</b>	<b>11.0%</b>	<b>550</b>	<b>89.0%</b>

Winery supplies sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
F/T permanent	73	69.5%	22	21.0%	69	61.6%	18	16.1%
P/T temporary or fixed-term	0	0.0%	2	1.9%	0	0.0%	4	3.6%
Internship, training or apprenticeship	1	1.0%	0	0.0%	0	0.0%	0	0.0%
Temporary contract (maternity leave, sick leave or leave for political activity)	1	1.0%	0	0.0%	1	0.9%	0	0.0%
F/T temporary contract for work or services	5	4.8%	1	1.0%	15	13.4%	5	4.5%
P/T temporary contract for work or services	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>80</b>	<b>76.2%</b>	<b>25</b>	<b>23.8%</b>	<b>85</b>	<b>75.9%</b>	<b>27</b>	<b>24.1%</b>

Financial services sector	2024				2023			
	Men	%	Women	%	Men	%	Women	%
F/T permanent	13	29.5%	30	68.2%	10	25.6%	28	71.8%
P/T temporary or fixed-term	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Internship, training or apprenticeship	0	0.0%	1	2.3%	0	0.0%	1	2.6%
Temporary contract (maternity leave, sick leave or leave for political activity)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
F/T temporary contract for work or services	0	0.0%	0	0.0%	0	0.0%	0	0.0%
P/T temporary contract for work or services	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>13</b>	<b>29.5%</b>	<b>31</b>	<b>70.5%</b>	<b>10</b>	<b>25.6%</b>	<b>29</b>	<b>74.4%</b>

### C) WORKFORCE BY CATEGORY

Total workforce in subsidiaries	2024			2023		
	Men	Women	Total	Men	Women	Total
General and area management	24	4	28	23	5	28
Engineers and graduates, reporting to head of functional area	6	5	11	5	8	13
Administrative managers, and heads of workshop and shift/Sales, nurses and physiotherapists	41	107	148	30	85	115
Grade one administrators and production or quality control staff	7	9	16	8	10	18
Grade two administrators and production or quality control staff	141	455	596	121	371	492
Administrative assistant, grade three staff, subordinates and labourers	33	226	259	22	144	166
Trainees and interns	3	1	4	5	2	7
<b>Total</b>	<b>255</b>	<b>807</b>	<b>1,062</b>	<b>214</b>	<b>625</b>	<b>839</b>



## Breakdown of workforce at Group subsidiaries

Cereals sector	2024			2023		
	Men	Women	Total	Men	Women	Total
General and area management	9	1	10	10	1	11
Engineers and graduates, reporting to head of functional area	4	2	6	4	2	6
Administrative managers, and heads of workshop and shift/Sales	0	0	0	0	0	0
Front-line staff, administrators and production or quality control staff	1	2	3	2	2	4
Grade two administrators and production or quality control staff	40	12	52	34	14	48
Administrative assistant, grade three staff, subordinates and labourers	3	0	3	0	0	0
Trainees and interns	0	0	0	1	0	1
<b>Total</b>	<b>57</b>	<b>17</b>	<b>74</b>	<b>51</b>	<b>19</b>	<b>70</b>

Care sector	2024			2023		
	Men	Women	Total	Men	Women	Total
General and area management	5	2	7	3	2	5
Doctors, psychologists	1	3	4	1	6	7
Nurses, qualified nutritionists and physiotherapists	21	102	123	9	80	89
Nursing assistants and gerontologists	3	14	17	5	18	23
Administrators and technicians in socio-cultural activities	51	407	458	33	319	352
Administrative assistants, cleaners, security guards	24	206	230	17	125	142
<b>Total</b>	<b>105</b>	<b>734</b>	<b>839</b>	<b>68</b>	<b>550</b>	<b>618</b>

Winery supplies sector	2024			2023		
	Men	Women	Total	Men	Women	Total
General and area management	8	1	9	8	2	10
Engineers and graduates, reporting to head of functional area	1	0	1	0	0	0
Administrative managers, and heads of workshop and shift/Sales	20	4	24	21	4	25
Front-line staff, administrators and production or quality control staff	3	0	3	3	0	3
Grade two administrators and production or quality control staff	42	13	55	44	11	55
Administrative assistant, grade three staff, subordinates and labourers	3	7	10	5	10	15
Trainees and interns	3	0	3	4	0	4
<b>Total</b>	<b>80</b>	<b>25</b>	<b>105</b>	<b>85</b>	<b>27</b>	<b>112</b>

Financial services sector	2024			2023		
	Men	Women	Total	Men	Women	Total
General and area management	2	0	2	2	0	2
Engineers and graduates, reporting to head of functional area	0	0	0	0	0	0
Administrative managers, and heads of workshop and shift/Sales	0	1	1	0	1	1
Front-line staff, administrators and production or quality control staff	3	7	10	3	8	11
Grade two administrators and production or quality control staff	5	9	14	5	9	14
Administrative assistant, grade three staff, subordinates and labourers	3	13	16	0	9	9
Trainees and interns	0	1	1	0	2	2
<b>Total</b>	<b>13</b>	<b>31</b>	<b>44</b>	<b>10</b>	<b>29</b>	<b>39</b>

## D) WORKFORCE BY QUALIFICATIONS

Total workforce in subsidiaries	2024			2023		
	Men	Women	Total	Men	Women	Total
PhD	0	0	0	0	0	0
Graduate	56	150	206	41	123	164
Higher professional training and long professional experience	112	422	534	93	342	435
FP2	16	16	32	13	16	29
High school or vocational training	49	209	258	61	142	203
Unqualified	22	10	32	6	2	8
<b>Total</b>	<b>255</b>	<b>807</b>	<b>1062</b>	<b>214</b>	<b>625</b>	<b>839</b>
<b>Totales</b>	<b>13</b>	<b>31</b>	<b>44</b>	<b>10</b>	<b>29</b>	<b>39</b>

## Breakdown of workforce at Group subsidiaries

Cereals sector	2024			2023		
	Men	Women	Total	Men	Women	Total
PhD	0	0	0	0	0	0
Graduate	13	5	18	14	5	19
Higher professional training and long professional experience	1	2	3	4	2	6
Vocational training	16	5	21	13	6	19
High school or vocational training	21	5	26	14	6	20
Unqualified	6	0	6	6	0	6
<b>Total</b>	<b>57</b>	<b>17</b>	<b>74</b>	<b>51</b>	<b>19</b>	<b>70</b>

Care sector	2024			2023		
	Men	Women	Total	Men	Women	Total
PhD	0	0	0	0	0	0
Graduate	26	118	144	13	91	104
Higher professional training (Voc1/2/higher) and long professional experience	62	415	477	42	336	378
Unqualified	17	201	218	13	123	136
<b>Total</b>	<b>105</b>	<b>734</b>	<b>839</b>	<b>68</b>	<b>550</b>	<b>618</b>

Winery supplies sector	2024			2023		
	Men	Women	Total	Men	Women	Total
PhD	0	0	0	0	0	0
Graduate	4	8	12	4	8	12
Higher professional training and long professional experience	49	5	54	47	4	51
Vocational training	0	1	1	0	2	2
High school or vocational training	11	1	12	34	11	45
Unqualified	16	10	26	0	2	2
<b>Total</b>	<b>80</b>	<b>25</b>	<b>105</b>	<b>85</b>	<b>27</b>	<b>112</b>

Sector auxiliar financiero	2024			2023		
	Men	Women	Total	Men	Women	Total
PhD	0	0	0	0	0	0
Graduate	13	19	32	10	19	29
Higher professional training and long professional experience	0	0	0	0	0	0
Vocational training	0	10	10	0	8	8
High school or vocational training	0	2	2	0	2	2
Unqualified	0	0	0	0	0	0
<b>Total</b>	<b>13</b>	<b>31</b>	<b>44</b>	<b>10</b>	<b>29</b>	<b>39</b>



## 4. Other workforce data

### 4.1. CAJA RURAL DE NAVARRA

Departures by gender, age and professional classification	2024			2023		
	Men	Women	Total	Men	Women	Total
Group I	0	0	0	0	0	0
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 1	0	0	0	1	0	1
Over 50	0	0	0	1	0	1
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 2	0	0	0	2	0	2
Over 50	0	0	0	2	0	2
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 3	0	0	0	0	0	0
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 4	0	0	0	0	0	0
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 5	0	0	0	0	0	0
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 6	1	1	2	0	1	1
Over 50	1	1	2	0	0	0
30 to 50	0	0	0	0	1	1
Under 30	0	0	0	0	0	0
Group II Grade 7	1	2	3	0	1	1
Over 50	1	1	2	0	1	1
30 to 50	0	1	1	0	0	0
Under 30	0	0	0	0	0	0
Group II Grade 8	0	0	0	1	0	1
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	1	0	1
Under 30	0	0	0	0	0	0

Departures by gender, age and professional classification	2024			2023		
	Men	Women	Total	Men	Women	Total
Group II Grade 9	0	0	0	1	0	1
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	1	0	1
Group II Grade 10	0	1	1	0	1	1
Over 50	0	0	0	0	0	0
30 to 50	0	1	1	0	1	1
Under 30	0	0	0	0	0	0
Group Professional Access Grade	0	0	0	0	0	0
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
Group III Assistants	0	0	0	0	0	0
Over 50	0	0	0	0	0	0
30 to 50	0	0	0	0	0	0
Under 30	0	0	0	0	0	0
<b>TOTAL (EUR)</b>	<b>2</b>	<b>4</b>	<b>6</b>	<b>5</b>	<b>3</b>	<b>8</b>

### 4.2. INVESTEES

	2024			2023		
	Men	Women	Total	Men	Women	Total
Total headcount at 1 January	171	448	619	152	392	544
Average headcount in the year	139.0349	436.8591	575.894	147.05	401.96	549.01
New hire contracts in the year	167	1,270	1,437	185	1,051	1,236
Contracts terminated in the year	136	1,204	1,340	166	1,000	1,166
Voluntary departures	26	122	148	4	9	13
Voluntary leave	2	7	9	0	42	42
Retirement (and early retirement)	2	4	6	1	2	3
Departures due to end of contract	111	1,046	1,157	158	929	1,087
Dismissals	8	31	39	4	18	22
<b>Total headcount at 31 December</b>	<b>187</b>	<b>508</b>	<b>695</b>	<b>171</b>	<b>448</b>	<b>619</b>

## REMUNERATION

Remuneration is first listed by comparison to the average by category, gender, qualifications and age. In this case, Caja Rural is differentiated from its subsidiaries.

### a) Caja Rural de Navarra

Average remuneration by category, gender and age	2024			2023			2024			2023		
	Average fixed remuneration			Average variable remuneration			Average fixed remuneration			Average variable remuneration		
	M	W	T	M	W	T	M	W	T	M	W	T
Group I	-	-	-	-	-	-	-	-	-	-	-	-
Over 50	-	-	-	-	-	-	-	-	-	-	-	-
30 to 50	-	-	-	-	-	-	-	-	-	-	-	-
Under 30	-	-	-	-	-	-	-	-	-	-	-	-
Group II Grade 1	3.29	0.00	3.29	9.29	0.00	9.29	3.09	0.00	3.09	4.76	0.00	4.76
Over 50	3.29	0.00	3.29	9.29	0.00	9.29	3.09	0.00	3.09	4.76	0.00	4.76
30 to 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 2	2.47	0.00	2.47	3.75	0.00	3.75	2.44	0.00	2.44	3.87	0.00	3.87
Over 50	2.46	0.00	2.46	3.63	0.00	3.63	2.42	0.00	2.42	3.74	0.00	3.74
30 to 50	2.50	0.00	2.50	4.23	0.00	4.23	2.46	0.00	2.46	4.14	0.00	4.14
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Over 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 to 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 4	1.87	2.31	1.95	2.43	4.02	2.72	1.88	2.35	1.97	2.55	3.43	2.71
Over 50	1.87	2.31	1.95	2.43	4.02	2.72	1.88	2.35	1.97	2.55	3.43	2.71
30 to 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 5	1.90	1.70	1.88	2.80	2.84	2.80	1.89	1.67	1.87	2.97	2.89	2.96
Over 50	1.85	1.70	1.82	2.70	2.84	2.73	1.79	1.67	1.77	2.76	2.89	2.78
30 to 50	2.06	0.00	2.06	3.05	0.00	3.05	2.11	0.00	2.11	3.39	0.00	3.39
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 6	1.44	1.29	1.39	1.98	1.81	1.93	1.40	1.26	1.36	2.02	1.76	1.94
Over 50	1.56	1.45	1.53	2.07	2.02	2.06	1.53	1.41	1.50	2.07	1.97	2.05
30 to 50	1.39	1.26	1.35	1.96	1.76	1.89	1.37	1.23	1.32	2.00	1.72	1.91
Under 30	1.20	1.06	1.13	1.51	1.89	1.70	1.12	0.00	1.12	1.77	0.00	1.77

Average remuneration by category, gender and age	2024			2023			2024			2023		
	Average fixed remuneration			Average variable remuneration			Average fixed remuneration			Average variable remuneration		
	M	W	T	M	W	T	M	W	T	M	W	T
Group II Grade 7	1.15	0.95	1.02	1.17	0.73	0.90	1.12	0.93	1.01	1.19	0.71	0.90
Over 50	1.16	0.99	1.08	0.98	0.60	0.80	1.15	0.96	1.06	0.91	0.59	0.75
30 to 50	1.15	0.94	1.01	1.24	0.75	0.92	1.12	0.93	1.00	1.27	0.73	0.93
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 8	1.00	0.91	0.94	1.00	0.82	0.89	0.99	0.89	0.94	0.95	0.65	0.80
Over 50	0.00	0.95	0.95	0.00	0.84	0.84	0.00	0.00	0.00	0.00	0.00	0.00
30 to 50	1.00	0.91	0.95	1.00	0.82	0.89	0.99	0.89	0.94	0.95	0.65	0.80
Under 30	0.00	0.93	0.93	0.00	0.84	0.84	0.00	0.00	0.00	0.00	0.00	0.00
Group II Grade 9	0.82	0.81	0.81	0.62	0.60	0.61	0.82	0.80	0.81	0.59	0.52	0.55
Over 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 to 50	0.84	0.85	0.85	0.67	0.61	0.64	0.85	0.83	0.83	0.69	0.57	0.61
Under 30	0.77	0.76	0.77	0.54	0.58	0.57	0.76	0.76	0.76	0.45	0.46	0.46
Group II Grade 10	0.67	0.67	0.67	0.33	0.31	0.31	0.63	0.63	0.63	0.20	0.20	0.20
Over 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 to 50	0.69	0.70	0.70	0.40	0.31	0.36	0.69	0.65	0.67	0.31	0.19	0.26
Under 30	0.67	0.67	0.67	0.31	0.30	0.30	0.62	0.62	0.62	0.18	0.20	0.19
Group Professional Access Grade	0.54	0.55	0.55	0.05	0.06	0.06	0.52	0.51	0.52	0.00	0.00	0.00
Over 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 to 50	0.55	0.58	0.57	0.00	0.05	0.04	0.00	0.53	0.53	0.00	0.00	0.00
Under 30	0.54	0.55	0.55	0.05	0.06	0.06	0.52	0.51	0.51	0.00	0.00	0.00
Group III Assistants	0.85	0.00	0.85	0.87	0.00	0.87	0.85	0.63	0.77	1.04	0.22	0.77
Over 50	0.85	0.00	0.85	0.87	0.00	0.87	0.85	0.00	0.85	1.04	0.00	1.04
30 to 50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Under 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.63	0.63	0.00	0.22	0.22

## b) Equity investments

Once again, the tables below show the salaries of all those who worked for these companies during the year. Comparative figures are based on the average hourly wage earned by each employee. Each sector has its own annual agreements and the disparity is shown. Figures in each comparative table are weighted by the number of hours worked to give a fairer picture of average earnings.

The first table shows the remuneration of all workers at all equity investments, as a total figure and by gender and age compared to average earnings.

	2024			2023		
	Total	Men	Women	Total	Men	Women
Under 30	0.93	1.09	<b>0.87</b>	0.89	1.08	<b>0.81</b>
31 to 40	1.05	1.26	<b>0.93</b>	1.03	1.20	<b>0.92</b>
41 to 50	1.10	1.38	<b>1.00</b>	1.15	1.49	<b>0.99</b>
51 to 60 years	1.08	1.52	<b>0.87</b>	1.08	1.48	<b>0.86</b>
Over 60	0.98	1.08	<b>0.96</b>	1.05	1.21	<b>0.98</b>
<b>Total</b>	<b>1.04</b>	<b>1.32</b>	<b>0.93</b>	<b>1.05</b>	<b>1.32</b>	<b>0.92</b>

For comparative purposes, earnings are analysed against average individual hourly wages (excluding the highest).

Average earnings data	Investees (2024)			Investees (2023)		
	Men	Women	Total	Men	Women	Total
Over 60	1.27	1.00	<b>1.07</b>	1.30	0.98	<b>1.07</b>
51 to 60 years	1.46	1.08	<b>1.21</b>	1.44	1.11	<b>1.24</b>
41 to 50	1.59	1.15	<b>1.27</b>	1.79	1.19	<b>1.39</b>
31 to 40	1.76	1.01	<b>1.24</b>	1.78	1.03	<b>1.30</b>
Under 30	1.25	1.11	<b>1.14</b>	1.46	1.18	<b>1.26</b>
<b>Total</b>	<b>1.52</b>	<b>1.07</b>	<b>1.20</b>	<b>1.59</b>	<b>1.10</b>	<b>1.27</b>

Breaking down this same ratio by contract type:

Average earnings data	Investees (2024)			Investees (2023)		
	Men	Women	Total	Men	Women	Total
F/T permanent	1.59	1.11	<b>1.28</b>	1.64	1.13	<b>1.33</b>
P/T temporary or fixed-term	0.98	0.99	<b>0.99</b>	1.11	1.07	<b>1.07</b>
Internship, training or apprenticeship	1.02	0.85	<b>0.92</b>	0.47	0.66	<b>0.61</b>
Temporary contract (maternity leave, sick leave or leave for political activity)	0.93	0.95	<b>0.95</b>	0.98	0.96	<b>0.96</b>
F/T temporary contract for work or services	0.98	0.95	<b>0.96</b>	1.30	0.99	<b>1.15</b>
P/T temporary contract for work or services	1.21	0.99	<b>1.01</b>	0.88	0.84	<b>0.84</b>
<b>Total</b>	<b>1.52</b>	<b>1.07</b>	<b>1.20</b>	<b>1.59</b>	<b>1.10</b>	<b>1.27</b>

And by professional category:

Average earnings data	Investees (2024)			Investees (2023)		
	Men	Women	Total	Men	Women	Total
General and area management	2.98	2.07	<b>2.85</b>	3.96	-	<b>3.96</b>
Engineers and graduates	2.17	2.07	<b>2.14</b>	2.51	1.86	<b>2.33</b>
Administrative managers, and heads of workshop and shift/Sales	1.22	1.25	<b>1.24</b>	1.84	1.91	<b>1.88</b>
Front-line staff, administrators and production or quality control staff	1.54	1.36	<b>1.41</b>	1.38	1.28	<b>1.31</b>
Grade two administrators and production or quality control staff	1.28	0.99	<b>1.07</b>	1.31	1.30	<b>1.31</b>
Administrative assistant, grade three staff, subordinates and labourers	1.11	0.94	<b>0.96</b>	1.31	1.00	<b>1.11</b>
Trainees and interns	0.91	0.85	<b>0.89</b>	1.21	0.95	<b>0.98</b>
<b>Total</b>	<b>1.52</b>	<b>1.07</b>	<b>1.20</b>	<b>0.91</b>	<b>0.70</b>	<b>0.84</b>

And by qualifications:

Average earnings data	Investees (2024)			Investees (2023)		
	Men	Women	Total	Men	Women	Total
PhD	2.10	1.30	<b>1.51</b>	2.09	1.33	<b>1.55</b>
Graduate	1.31	1.36	<b>1.32</b>	1.55	1.39	<b>1.52</b>
Higher professional training and long professional experience	1.68	1.24	<b>1.46</b>	1.53	1.18	<b>1.35</b>
Vocational training	1.21	0.97	<b>1.01</b>	1.29	0.99	<b>1.07</b>
High school or vocational training	1.49	0.96	<b>1.11</b>	1.57	0.93	<b>1.05</b>
Unqualified	1.52	1.07	<b>1.20</b>	1.79	1.37	<b>1.71</b>
<b>Total</b>	<b>2.10</b>	<b>1.30</b>	<b>1.51</b>	<b>2.09</b>	<b>1.33</b>	<b>1.55</b>

## SOCIAL PROTECTION

Below, in accordance with Law 11/2018, we list metrics on accidents and social protection.

Caja Rural de Navarra Group (2024)	2024									2023								
	CRN			Subsidiaries			Total			CRN			Subsidiaries			Total		
	M	W	T	M	W	T	M	W	T	M	W	T	M	W	T	M	W	T
Accidents without time off	1	5	6	N/A	N/A	21	-	-	27	3	1	4	N/A	N/A	30	-	-	34
Accidents with time off	2	2	4	18	48	66	-	-	70	1	3	4	N/A	N/A	58	-	-	62
<b>Total</b>	<b>3</b>	<b>7</b>	<b>10</b>	<b>N/A</b>	<b>N/A</b>	<b>87</b>	<b>-</b>	<b>-</b>	<b>97</b>	<b>4</b>	<b>4</b>	<b>8</b>	<b>N/A</b>	<b>N/A</b>	<b>88</b>	<b>-</b>	<b>-</b>	<b>96</b>

Caja Rural de Navarra Group (2024)	2024									2023								
	CRN			Subsidiaries			Total			CRN			Subsidiaries			Total		
	M	W	T	M	W	T	M	W	T	M	W	T	M	W	T	M	W	T
Frequency rate	3.47	7.66	5.62	N/A	N/A	0.078	-	-	5.698	4.78	4.56	9.35	N/A	N/A	0.072	-	-	9.422
Severity rate	0.01%	0.02	0.03	N/A	N/A	16.90	-	-	16.93	0.01	0.02	0.03	N/A	N/A	-	-	-	10,6
<b>Incidence index</b>	<b>5.89</b>	<b>12.86</b>	<b>18.76</b>	<b>N/A</b>	<b>N/A</b>	<b>4.97</b>	<b>-</b>	<b>-</b>	<b>23.73</b>	<b>10.57</b>	<b>-</b>	<b>-</b>	<b>10.6</b>	<b>N/D</b>	<b>2,60</b>	<b>-</b>	<b>-</b>	<b>18,49</b>

Also, in 2024 there were a total of 10 workplace accidents at Caja Rural de Navarra, of which 4 required time off work. There are no recognized occupational illnesses for the industry.

The 2024 metrics for Caja Rural de Navarra Group are as follows:

- **Frequency rate:** 5,69%
- **Severity rate:** 16,93%

The following actions are planned for 2025:

- Training of new staff members
- Continued coordination across business
- Review of assessment methods and assess centres/roles
- Meeting the targets in the annual plan
- Continuation of the Healthy Company group

In the equity investments there were 21 accidents without time off and 66 with time off, with a frequency rate of 7.8% (7.25% in 2023) and a severity rate of 16.9% (10.6% in 2023).

The absenteeism items for equity investments are as follows:

Absenteeism at equity investments	2024			2023		
	Men	Women	Total	Men	Women	Total
Accident	5,313.45	10,760.75	16,074.20	2,174.39	7,086.36	9,260.75
Common illness	10,994.57	70,692.19	81,686.76	10,336.87	33,944.41	44,281.28
Covid illness	0,00	74.00	74.00	-	-	-
Maternity	0,00	1,228.00	1,228.00	-	12,642.46	12,642.46
Paternity	2,038.00	0,00	2,038.00	3,448.00	-	3,448.00
Child care	49.50	54.00	103.50	10.75	48.25	59.00
Illness care	96.75	230.00	326.75	547.25	58.50	605.75
Other personal reasons	97.00	203.25	300.25	319.25	7,489.00	7,808.25
Jury, union leave, etc.	0,00	0,00	0,00	-	3,696.00	3,696.00
Total hours off work	18,589.27	83,242.19	101,831.46	16,836.51	64,964.98	81,801.49
Total working hours	284,279.83	666,739.02	951,018.85	251,024.45	624,997.54	876,021.99
<b>Total hours absenteeism</b>	<b>18,589.27</b>	<b>83,242.19</b>	<b>101,831.46</b>	<b>7,774.12</b>	<b>55,542.62</b>	<b>73,204.74</b>

Absenteeism	2024			2023		
	Caja Rural de Navarra	Subsidiaries	Total	Caja Rural de Navarra	Subsidiaries	Total
Total hours	74,380.88	101,831.46	176,212.34	70,959.15	73,204.74	144,163.89



# Annex VIII

## **Loan Portfolio Allocation and Impact Report**

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Caja Rural de Navarra, as a cooperative, retail and regional institution, has always had close ties with the primary sector and supported its responsible development. Over the years, the Bank's business has changed with the increasing industrialization of the regions where it operates, but it has always remained true to its culture of transparency, responsibility and sustainability and commitment to the environment.

The Bank is committed to Environmental, Social and Governance (ESG) standards that shape the focus, goals and policies of the Bank regarding different aspects of sustainability.

## 01. Sustainable finance framework

As part of its focus on ESG issues Caja Rural de Navarra created a sustainability framework (the "Framework<sup>1</sup>") for its loan portfolio in order to promote those financing lines that have the greatest social and environmental impact in the regions where the Bank is active in line with the priorities of its social projects.

The Framework is aligned with the 2021 Green Bond Principles (GBP), 2023 Social Bond Principles (SBP) and the 2021 ICMA Sustainable Bond Guidelines (SBG), to provide transparency and

engagement with the green, social and sustainable bond markets. Caja Rural de Navarra's Framework adopts not only the use of proceeds, disclosure and reporting practices recommended by the ICMA, but also the definitions of the nine financing lines as eligible for the GBP and SBP. The Framework is also aligned with the European Union Taxonomy, and the APLMA, LMA and LSTA Green Bond and Social Bond Principles.

Funds raised by Caja Rural de Navarra through sustainable bonds and loans issued under this Framework are used to promote green and social projects and support, among others, the Paris Climate Agreement and the Sustainable Development Goals (SDGs) of the United Nations.

The Framework is regularly reviewed and updated as necessary, since the categories it addresses tend to change, evolving and developing to keep pace with responsible social and environmental practices. It was last updated in 2024. The Framework is supervised by Sustainalytics<sup>2</sup>, which issues a "Second-Party Opinion"<sup>3</sup> report (last report as of December 2024) in which it ratifies that the Bank's Framework is credible and impactful and aligns with the aforementioned principles, guidelines and objectives.

Caja Rural de Navarra's CSR Report, which contains this assignment and impact report, is verified annually by a third party (AENOR).

## 02. Sustainable finance (assets)

In 2024, the funds from the sustainable bonds issued by Caja Rural de Navarra were allocated to existing or new lending projects or activities corresponding to the 9 eligible funding lines under the Framework:

Sustainable finance line	Sustainable financing
Sustainable farming	13,276,363
Renewable energy	89,076,822
Energy efficiency	1,544,930,078
Sustainable forestry	3,604,152
Waste management	11,096,935
Social housing	345,063,590
Social inclusion	20,172,645
Education	23,909,314
Economic inclusion	2,115,072,977
	<b>4,166,202,879</b>

In 2024 Caja Rural de Navarra has continued to support individuals and companies in our region by granting funding for social inclusion, educational and economic inclusion projects to

reduce inequalities, enabling the preservation of jobs and a business fabric that is fundamental for social and economic development, and by financing renewable energy projects.

Below is a breakdown of sustainable finance aligned by each of the 9 sustainable finance strands (green and social) outlined in the Framework<sup>4</sup> and mapped to the United Nations Sustainable Development Goals (SDGs)<sup>5</sup>:

1 <https://www.cajaruraldenavarra.com/sites/default/files/info-inversores/Sostenibilidad/Marco/Sustainable%20Finance%20Framework-VFinal.pdf>

2 <https://www.sustainalytics.com/>

3 <https://www.cajaruraldenavarra.com/sites/default/files/info-inversores/Sostenibilidad/Marco/Caja%20Rural%20de%20Navarra%20Sustainable%20Finance%20Framework%20Second%20Party%20Opinion.pdf>

4 This information has been prepared using internal data and following generally accepted criteria, within the Framework for sustainable financing of the loan portfolio for the issue of sustainable bonds by Caja Rural de Navarra, as well as European regulations and recommendations in this regard. That said, it is not always possible to obtain detailed information on each loan exposure, which means the sustainable portfolio (understood as loans meeting the Framework criteria) could be substantially larger than indicated here, as the above figures exclude loans where full information was unavailable.

5 <https://www.un.org/sustainabledevelopment/es/objetivos-de-desarrollo-sostenible/>

## 1. SUSTAINABLE FARMING



### 12.2

“By 2030, achieve sustainable management and efficient use of natural resources”

### 12.3

“By 2030, halve global per capita food waste at retail and consumer level and reduce food losses in production and supply chains, including post-harvest losses”.

This category includes loans to finance projects that ensure greater resource efficiency and more sustainable management of natural and man-made processes, increasing biodiversity and agricultural productivity and resilience to climate change. EU organic certification is also an eligibility criterion. FAO's climate-smart agriculture approach and practices will be taken into account.

The Bank has carried out an individual analysis of the loans included in this category according to the fulfilment of the purpose of the financing in accordance with the Sustainable Financing Framework.

From this analysis, we can conclude that the present facility has a cumulative amount of EUR 13 million at 31 December 2024, spread over 161 loans.

As part of the savings bank's commitment to support the new generation that drives the primary sector and the rural environment, 13.57% of the financing granted to individuals has been earmarked for young farmers (under 40 years of age). Likewise, 41.63% of the loans were granted to Cooperatives, Agricultural Transformation Companies and other agricultural associations, maintaining the traditional line of support for collective and cooperative initiatives.

Caja Rural de Navarra's customers in the agri-food sector are also committed to sustainability, a number of them having obtained European ecological certification for organic production.



The table below breaks down lending by purpose as a percentage of the category total:

Other management practices that increase resource efficiency (such as financing of cooperatives as well as storage, transport and waste management projects).	<b>61.55%</b>
Gravity irrigation (avoiding the use of motors for pumping)	<b>18.77%</b>
Shared use of machinery (CUMA)	<b>15.80%</b>
Solar and wind generation in agricultural activities	<b>3.05%</b>
Electric or hybrid vehicles	<b>0.8%</b>

## 2. RENEWABLE ENERGY



### 7.2

"By 2030, significantly increase the share of renewable energy in the energy mix"

This category includes loans for the generation of electricity from renewable sources, as well as the development of renewable energy infrastructure and the manufacture of components for these industries.

The Bank has carried out an individual analysis of the loans included in this category according to the fulfilment of the purpose of the financing in accordance with the Sustainable Financing Framework.

As a result of the analysis, we can conclude that the present facility totals EUR 89 million at 31 December 2024, spread over 71 credit operations.

The Bank analysed loans in this category individually, classifying them into the following types based on their purpose:

→ Companies generating electricity from the following technologies: solar, wind, hydro, geothermal, hydrogen and bioenergy.

#### BALANCE

EUR 40.4 million

#### NUMBER OF LOANS

37

→ Companies developing, constructing, equipping, operating and maintaining new or additional networks for the transmission and distribution of energy (electricity only) from renewable sources

#### BALANCE

EUR 46.4 million

#### NUMBER OF LOANS

22

→ Renewable energy technology manufacturing companies

#### BALANCE

EUR 2.2 million

#### NUMBER OF LOANS

12

### 3. ENERGY EFFICIENCY



#### 7.2

"By 2030, significantly increase the share of renewable energy in the energy mix"

This category includes loans whose purpose is the development of products and technologies that reduce energy consumption or the manufacture of components for this purpose as well as energy efficiency in buildings.

From the analysis of the entity's information, we can conclude that, during the financial year 2024, this line totalled EUR 1,544 million, spread across 12,859 loans.

The Bank analysed loans in this category individually, classifying them into the following types based on their purpose:

- **Development, construction or acquisition of products, technologies or equipment that reduce the energy consumption of the underlying asset/system**

**BALANCE**  
EUR 132 million

**NO. TRANSACTIONS**  
692

- **Energy efficient buildings: Construction, acquisition and renovation**

**BALANCE**  
EUR 1,412 million

**NO. TRANSACTIONS**  
12,167

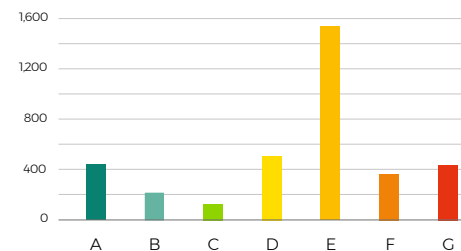
As of 31 December 2024, a total of 10,504 outstanding loans had been granted that financed the acquisition or refurbishment of properties with an energy rating in accordance with the EU Taxonomy (Activities 7.1, 7.2 and 7.7):

- 15% more efficient for acquisition and ownership
- 30% energy efficiency improvement for renovation

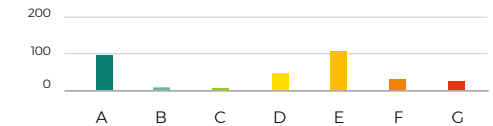
The Bank has included energy efficiency data that applies these criteria in its system for all new mortgages since 2019.

In addition, between 2021 and 2022, the Savings Bank carried out a global analysis of the mortgage portfolio with a third party (Sociedad de Tasación), which has been renewed in subsequent years and which allowed us to upload new energy efficiency certificates (or estimates thereof) that we did not have, and thanks to which we obtained additional data, thus reaching a high percentage of the mortgage portfolio labelled with the corresponding energy efficiency data.

Energy Performance Certificate (EPC) ratings of the mortgage portfolio at 31 December 2024:



Millions of euros  
Energy efficiency information not available for 17% of mortgages.



Millions of euros  
Energy efficiency information not available for 17% of mortgages.

Caja Rural de Navarra, through its financing to Communities of Owners, contributes to the fulfilment of the objectives set out in the 2030 Agenda for Sustainable Development.

The main lines of financing, aimed at contributing to sustainability in housing, are focused on energy efficiency, improving the insulation of buildings and the installation of windows, and the use of alternative energies, such as the installation of renewable energy sources (solar panels, geothermal and aerothermal), which reduce the consumption of fossil fuels and the emission of greenhouse gases.

This line of financing has enabled 126 homeowners' associations (3,172 homes) to carry out the work necessary to meet these objectives, also enabling their owners to save money by demanding lower energy consumption, improving comfort and health in the home, as well as increasing the value of their homes.

## 4. SUSTAINABLE FOREST MANAGEMENT

15  
LIFE  
ON LAND



### 15.2

"By 2030, promote sustainable management of all types of forests, halt deforestation, restore degraded forests and increase afforestation and reforestation globally" 15.3

"By 2030, promote sustainable management of all types of forests, halt deforestation, restore degraded forests and increase afforestation and reforestation globally".

This category covers loans whose purpose is forestation, reforestation and the development of forestry plantations

From the analysis of the Bank's information, we can conclude that this line totalled EUR 3.6 million in 2024, and included 9 loans.

All loans in this category were for sustainably managed woodlands certified either by the PEFC (Programme for the Endorsement of Forest Certification) <sup>1</sup> which verifies that forests around the world are being sustainably and responsibly managed and that their many functions are being safeguarded for current and future generations, or by the FSC (Forest Stewardship Council), which guarantees that products are sourced from well-managed woodland that provides environmental, social and economic benefits.

<sup>1</sup> <https://www.pefc.org/>





## 5. WASTE MANAGEMENT



**12.5**  
"By 2030, significantly reduce waste generation through prevention, reduction, recycling and reuse".

This category includes loans to develop equipment and technology that make more efficient use of resources and/or reduce waste generation.

From the analysis of the Bank's information, we can conclude that, as of 31 December 2024, the line totalled EUR 11 million, across 40 loans.

The Bank has carried out an individual analysis of the loans included in this category, classifying them according to their purpose:

→ **Building, developing or using technologies/equipment and processes that increase resource efficiency or reduce waste production**

**BALANCE**  
EUR 0.6 million

**NUMBER OF LOANS**  
2

→ **Undertake projects that generate inputs from used materials, such as recycling and circular economy processes.**

**BALANCE**  
EUR 10.4 million

**NUMBER OF LOANS**  
38

## 6. SOCIAL HOUSING AND PUBLIC HOUSING



### 11.1

"By 2030, ensure access to adequate, safe and affordable housing and basic services for all people and improve slums"

11.2 "By 2030, ensure access for all people to adequate, safe and affordable housing and basic services and improve slums".

This category includes loans intended to provide affordable housing for disadvantaged populations, according to requirements set by regional governments. These requirements may include criteria such as income level, number of family members, number of elderly/disabled persons within the family, immigrant origin of the family, violence suffered by women in the household, and single-parent households.

From the analysis of the Bank's information, we can conclude that, in 2024, this line totalled EUR 345 million, spread across 4,743 loans.

Only 0.1% of the amount of these loans is in default for more than 90 days, very similar to the ratio of the rest of the home mortgage loans granted by our Bank. This indicates that although the customers are normally on lower incomes they are just as likely to meet their payments as the Bank's other home mortgage borrowers and that their household finances can generally bear the cost of buying a home under these schemes.

Below is a table showing the average income per person in the family unit holding the loan:

AVERAGE INCOME PER PERSON	
Less than EUR 12,000	5.5%
EUR 12,000 to 25,000	17.4%
EUR 25,000 to 50,000	8.3%
More than EUR 50,000	1.4%
NA	67.4%

As for the distribution of these loans, 90% were granted to natural persons and 10% to legal entities.

Of the individuals, 12.13% are under 35 years of age, which indicates that thanks to this financing, young people have easier access to what is going to be their first home.

Likewise, slightly more than 22.91% of the loans have been granted to people over 50 years of age who, due to different life circumstances, need access to housing at a later stage of their lives.

## 7. SOCIAL INCLUSION



**10.2**  
"By 2030, enhance and promote the social, economic and political inclusion of all people, irrespective of age, gender, disability, race, ethnicity, origin, religion or economic or other status".

Caja Rural de Navarra works in a special way with those entities that make efforts for social integration and the social and economic development of the territories in which the Bank is present. Caja Rural's involvement with these bodies takes a variety of forms, not limited to financing their social projects, and in some cases involving the Bank meeting part of the costs of the activities it is promoting.

From the analysis of the entity's information, we can conclude that the present line totals EUR 20.2 million and 133 loans. These figures have been classified into the following categories:

→ **Building cultural facilities, such as community centres, for socially or economically marginalised groups**

**BALANCE**  
EUR 2.6 million

**NUMBER OF LOANS**  
18

Caja Rural de Navarra has for many years supported organisations that bring together people with a disability. These organisations run training and rehabilitation centres as well as special employment centres to support people into work. Altogether they offer training and rehabilitation to over 7,000 people and employ more than 6,000. In this way they support a substantial proportion of those with disabilities in Navarre, the Basque Country and La Rioja.

Caja Rural de Navarra is also clearly committed to people of all ages, origins and social classes. This is why it strongly supports organisations that work to help and integrate these groups at risk of social exclusion into society: immigrants, the gypsy community, minors, drug addicts and the elderly unemployed.

→ **Providing employment training programmes or facilities for young people, the unemployed, the physically or mentally disabled, or any other socially or economically marginalised group**

**BALANCE**  
EUR 3.1 million

**NUMBER OF LOANS**  
18

The social and economic fabric in which Caja Rural de Navarra is present is strongly developed through associations and professional associations and research centres. Caja Rural de Navarra firmly supports this social fabric by financing the essential infrastructure such groups rely on. These associations help ensure that small businesses and the self-employed are kept permanently informed on tax, employment, legal and financial matters. They also have representative bodies speaking to the government and different private organisations.

→ **Providing affordable housing/care for the elderly, whether in the form of nursing homes or day centres or similar facilities/services**

**BALANCE**  
EUR 14.4 million

**NUMBER OF LOANS**  
97

Bearing in mind that we have an increasingly ageing population, Caja Rural de Navarra supports the construction of infrastructures and the necessary equipment to enable the health care and social and health inclusion of the elderly and young people with some degree of dependency.

## 8. EDUCATION



### 4.a

"By 2030, build and adapt education facilities that are child-, disability- and gender-sensitive, and that provide safe, non-violent, inclusive and effective learning environments for all".

Caja Rural de Navarra is clearly committed to basic, intermediate and advanced training. It is in direct contact with public and private training providers. The Ceja's involvement with all of them is carried out in different ways, not limited exclusively to the financing of these educational projects, but in some cases also involves the Caja assuming part of the expenses involved in these educational activities.

The balance financed in this category is broken down below:

- **Build new school and vocational training facilities such as laboratories, libraries, computer rooms, gymnasiums, etc. in public schools.**

#### BALANCE

EUR 23.9 million

#### NUMBER OF LOANS

109

Caja Rural de Navarra is currently financing the investments made by 75 training centres, which currently have more than 35,000 students.

International scholarships: for university students and professional training. This provides financial support for students wanting to study for some time in educational institutions or companies abroad so that none is prevented from doing so through lack of money. These grants have reached a total of 798 students (559 UPNA, 36 Deusto, 72 Erasmus Plus FP Navarra, 86 Erasmus Plus FP Basque Country and 45 Global Scholarships by Caja Rural).



## 9. ECONOMIC INCLUSION



### 8.3

"Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalisation and growth of micro, small and medium-sized enterprises, including through access to financial services".

This category includes loans for the purpose of lending to small and medium-sized enterprises, borrowers in remote areas and entrepreneurs.

The Bank's local roots and neighbourhood presence in the region's population centres, large and small, meant that companies, particularly small and mid-sized enterprises, were able to get agile access to the various lines of finance.

The Covid-19 pandemic and invasion of Ukraine took a heavy toll in recent years on the economic fabric of the regions where Caja Rural de Navarra operates. A key economic policy measure taken by regional governments and the Spanish national government was to work with lending institutions to offer companies, particularly SMEs, financing lines that would avoid a tightening of access to credit and consequent destruction of employment and the business fabric.

Overall, this category encompasses 18,238 loans with a total amount of EUR 2,115 million.

This category includes loans that meet the following requirements:

- Lending to remote areas that favours economic inclusion by promoting access to finance in remote areas (where the entity has a special presence) according to the criteria indicated in the sustainable financing framework.
- Loans granted to entrepreneurs or microenterprises
- Loans to SMEs as defined by the European Union
- Covid-19 and Ukraine lines, under different government schemes to support and maintain economic activity and jobs in the face of the Covid-19 pandemic and the fallout from the invasion of Ukraine.

Each of the above rankings is detailed below:

## 1. Lending in remote areas

From the analysis of the available data, we can conclude that this line consists of EUR 108 million and comprises 2,880 loans. It is a highly diversified line, with special emphasis on rural areas and small population centres.

## 2. Financing for entrepreneurs

Caja Rural de Navarra reaffirms its commitment to entrepreneurship through the **Línea Inicia**, an initiative created in 2007 with the aim of promoting and supporting those who decide to start up a new business. This specific line not only offers financing adapted to the needs of entrepreneurs, but also promotes strategic activities related to the creation and consolidation of businesses in all the territories where the entity operates.

Since its launch, **Línea Inicia has financially supported 2,866 projects**, with a total of 4,992 initial partners. In 2024 alone, it has enabled the development of 197 new projects led by 362 entrepreneurs, providing a total of **EUR 12.27 million** in financing.

The most common profile of the entrepreneur accessing this line is a man of around 40 years of age, with a university education and who decides to start a business in the service sector, mostly under the legal form of an S.L. The average investment made amounts to **EUR 96,000**, with an average financing requested of EUR 62,000. Note that most of the beneficiaries were previously employed, which indicates that they are not starting a business out of necessity, but in many cases as a clear development of their professional circumstances. Also, **28% of the projects**

**financed correspond to business transfers or generational changes**, a trend that has remained constant over the last three years.

The success of a business depends not only on the initial capital, but also on access to a **specialised support network** that guides the entrepreneur through the different stages of the process. For this reason, Línea Inicia not only finances, but also establishes **strategic alliances with entities and professionals in the entrepreneurial ecosystem**. Through these agreements, entrepreneurs receive specialised training, personalised advice and support in the first steps of their business, as well as benefiting from the accumulated experience of experts in different sectors.

During 2024, we have made available to entrepreneurs various programmes and resources designed to strengthen their projects and ensure their long-term sustainability, thus consolidating our commitment to the entrepreneurial fabric and its impact on the local economy.

### → Promotion of cooperative entrepreneurship and the social economy:

- Collaboration with ANEL (Navarre Association of Social Economy Enterprises)<sup>1</sup>.
- Collaboration with ASLE (Asociación Sociedades Laborales de Euskadi)<sup>2</sup>.

### → Awards for end-of-studies projects (Bachelor's and Master's) for entrepreneurship projects:

- Collaboration with the Public University of Navarra (UPNA)<sup>3</sup>
- Collaboration with the Bilbao Engineering School Foundation<sup>4</sup>

<sup>1</sup> <https://www.anel.es/anel-y-caja-rural-de-navarra-se-alian-para-fortalecer-el-emprendimiento-cooperativo-en-navarra/>

<sup>2</sup> <https://asle.es/>

<sup>3</sup> <https://www.cajaruraldenavarra.com/es/viii-edicion-premios-caja-rural-de-navarra>

<sup>4</sup> <https://www.ehu.eus/es/web/campusa/-/fundacion-escuela-ingenieria-premios-rural-kutxa>



→ **Promotion of entrepreneurship among people who have an interest in entrepreneurship at the idea stage:**

- Theatre play "Tres contra el mundo" - Collaboration with Asociación Proyéctate y Crece (APYCES)<sup>5</sup>

→ **Training for start-up CEOs:**

- Collaboration between CEBEK - Finbox and Rural Kutxa<sup>6</sup>

→ **Training for entrepreneurs starting businesses in traditional sectors:**

- Collaboration agreement with Grupo Integra, to train new entrepreneurs and business consolidation<sup>7</sup>.
- CEIN RUTA 31 Awards<sup>8</sup>

→ **Consultancy, training support and project acceleration:**

- Collaboration with CEIN - IMPULSO EMPRENDEDOR initiative<sup>9</sup>
- Collaboration with Consorcio Eder (Ribera Nexo programme, III edition)<sup>10</sup>.
- Berriup / University of Deusto Collaboration<sup>11</sup>

<sup>5</sup> <https://www.cajaruraldenavarra.com/es/content/sala-de-prensa/26>

<sup>6</sup> <https://www.cebek.es/es/noticia/cebek-y-rural-kutxa-ponen-en-marcha-la-segunda-edicion-de-formacion-financiera-en-startups/>

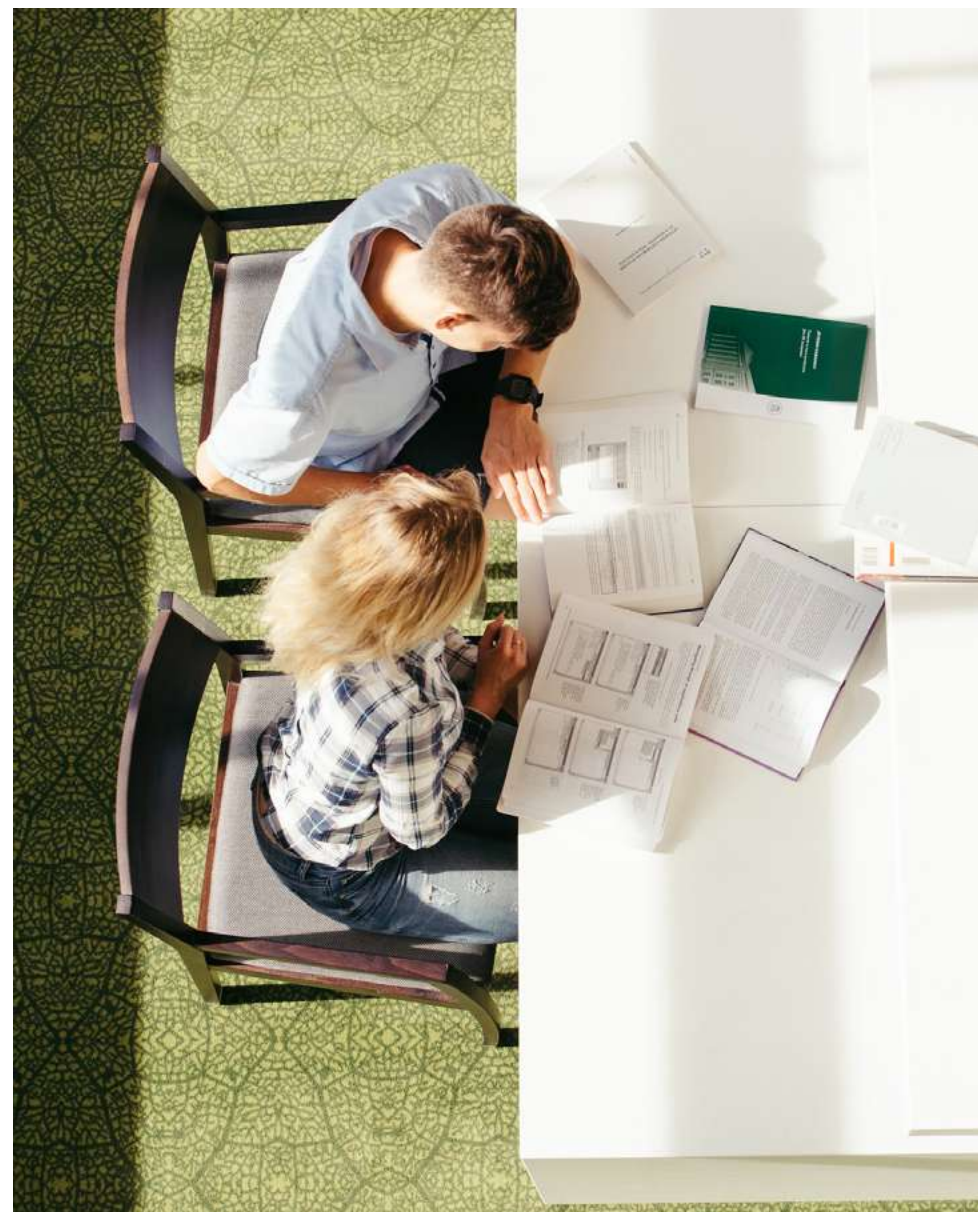
<sup>7</sup> <https://www.integratecnologia.es/casos-de-exito/caja-rural-de-navarra>

<sup>8</sup> <https://blog.cajaruraldenavarra.com/cein-logra-la-conversion-de-113-proyectos-en-empresas-este-ano/>

<sup>9</sup> <https://www.cajaruraldenavarra.com/es/premios-impulso-emprendedor>

<sup>10</sup> <https://blogempresas.cajaruraldenavarra.com/caja-rural-navarra-impulso-proyectos-emprendedores-Ribera>

<sup>11</sup> <https://www.cajaruraldenavarra.com/es/17-programa-aceleraci%C3%B3n-berriup>





## PROFILE OF ENTREPRENEURS/COMPANIES CREATED

Key data on Línea Inicia lending in 2024:

### FINANCE DATA

	TOTAL (EUR)	PER PROJECT (EUR)	%
INVESTMENT	18,917,505	96,027	100%
FINANCE	12,275,002	62,309	65%
EQUITY CONTRIBUTION	6,642,503	33,718	35%

### MEMBERS

MEN	63%
WOMEN	31%
LEGAL ENTITIES	6%



### PROJECTS SUPPORTED

		PARTNERS (JOBS CREATED)			
		T	M	W	LE
NAVARRA	117	232	147	74	11
LA RIOJA	8	10	5	3	2
GUIPÚZCOA	28	50	33	11	6
ÁLAVA	10	15	7	7	1
VIZCAYA	34	55	36	18	1
<b>TOTAL (EUR)</b>	<b>197</b>	<b>362</b>	<b>228</b>	<b>113</b>	<b>21</b>

T: Total / M: Men / W: Women / LE: Legal entities

### AVERAGE AGE

**38.90 years**

### REASON FOR STARTING COMPANY

UNEMPLOYMENT	9%
DIVERSIFY	25%
BETTER JOB	66%



### CAJA RURAL DE NAVARRA CUSTOMERS?

NON-CUSTOMERS	65%
CUSTOMERS	35%

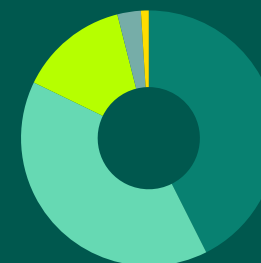


### BUSINESS FRANCHISE

**54 franchises**  
(28% of total)

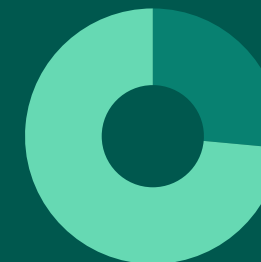
### LEGAL FORM

LIMITED COMPANY	43%
SELF-EMPLOYED	40%
COOPERATIVE	14%
IRREGULAR COMPANY	3%
ASSOCIATION	1%



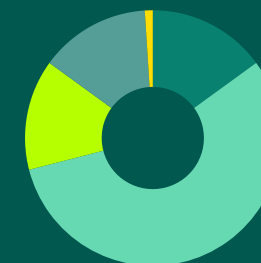
### SOURCE OF PROJECTS

OWN INITIATIVE	37%
RECOMMENDATION	63%



### SECTOR OF ACTIVITY

INDUSTRY	15%
SERVICES	56%
COMMERCE	14%
HEALTH/SPORT	14%
CULTURAL	1%



**INVESTMENT**

REGION	TOTAL INVESTMENT (EUR)	EQUITY (EUR)	%	FINANCE (EUR)	%
NAVARRRE	12,549,205	4,637,043	37%	7,912,162	63%
LA RIOJA	1,246,000	315,000	25%	931,000	75%
GUIPÚZCOA	2,198,800	654,600	30%	1,544,200	70%
ÁLAVA	1,088,500	319,500	29%	796,000	71%
VIZCAYA	2,266,000	892,360	39%	1,373,640	61%
<b>TOTAL (EUR)</b>	<b>19,348,505</b>	<b>6,818,503</b>	<b>35%</b>	<b>12,530,002</b>	<b>65%</b>

**TYPICAL PROFILE BY REGION**

REGION	GENDER	AGE	QUALIFICATIONS	EMPLOYMENT STATUS	LEGAL FORM	SECTOR OF ACTIVITY
NAVARRRE	Men	39.9 years	University	Better job	S.L./Sole trader	Services
BASQUE COUNTRY	Men	38.7 years	University	Better job	Ltd.	Services
LA RIOJA	Men	38.1 years	University	Better job	Ltd.	Services
<b>SUB-ZONES</b>						
GUIPÚZCOA	Men	39.8 years	University	Better job	Ltd.	Services
ÁLAVA	Men	38.2 years	University	Better job	Sole trader	Services
VIZCAYA	Men	37.8 years	University	Better job	Sole trader	Services

## ADDITIONAL DATA

### LÍNEA INICIA NPL RATIO:

- Doubtful/Asset + Guarantees

→ NPL ratio (end-Dec 2024): **1.06%, equivalent to EUR 849,000.**

### → Total projects and direct jobs generated:

Total annual inicia **projects**:

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
No. projects per year	21	76	116	125	132	135	151	170	185	194	199	220	229	156	197	181	182	197
Cumulative total	21	97	213	338	470	605	756	926	1111	1305	1504	1724	1953	2109	2306	2487	2669	2866

Total annual **jobs created** by inicia projects:

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Jobs created	50	160	200	230	240	220	254	290	260	299	330	381	391	284	367	343	331	362
Cumulative total	50	210	410	640	880	1100	1354	1644	1904	2203	2533	2914	3305	3589	3956	4299	4630	4992
Ave. jobs/project	2.38	2.11	1.72	1.84	1.82	1.63	1.68	1.71	1.41	1.54	1.66	1.73	1.71	1.82	1.86	1.90	1.82	1.84

### FINANCING SMES

This section covers all SME finance other than the remote area loans and Covid-19 and Ukraine financing referred to above.

Based on available data, we calculate that the current loan book for these purposes totals EUR 1,536 million at 31 December 2024, consisting of 9,729 loans.

Breaking this data down we can identify a significant number of positive social impacts:

**1/** Regarding the current status of these loans, 0.5% of the total amount is more than 90 days past due, an excellent figure given the average for the financial sector.

**2/** Secondly, we present below the number of transactions in micro-, small- and medium-sized enterprises. These categories are defined under Commission Regulation (EU) 651/2014, based on headcount and annual revenue or total assets:

	Number of employees	Sales	Total assets
Micro	Less than 10	Less than EUR 2 million	Less than EUR 2 million
Small	10 to 49	Less than EUR 10 million	Less than EUR 10 million
Medium-sized	50 to 249	Less than EUR 50 million	Less than EUR 43 million
Large	Over 250	More than 50 million	More than 43 million

The table below shows that more than 77.1% of financing in this category went to micro-enterprises (54.9%) and small companies (22.2%), underlining the Bank's penetration and its concern to maintain the local business fabric.

#### COMPANY SIZE

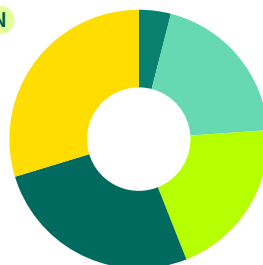
MICRO	54.9%
SMALL	22.2%
MEDIUM	22.9%



3 / Caja Rural de Navarra has always supported SMEs, building up the essential business fabric for the regions to develop and remain competitive in their production. This is evidenced by the fact that over 56% of companies have been loyal customers of the Bank for more than 10 years. In addition, the Bank continues to support new companies. More 4% of companies initiated their relationship with the Bank in the last year.

#### LENGTH OF RELATIONSHIP WITH CRN

<1 year	4.0%
1-5 years	19.9%
5-10 years	20.1%
10-20 years	26.3%
+20 years	4%



4 / The Bank's involvement in rural development is an important strand of its work. Nearly 22% of sums lent went to companies based in populations of less than 10,000 people, which means the scheme is not only developing the local economy but also reinforcing the social fabric in rural zones.

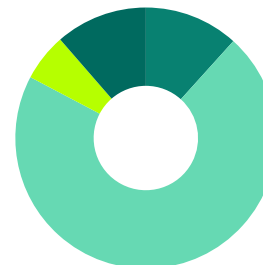
#### POP. PER TOWN/VILLAGE

5,000	17.0%
5,000 to 10,000	5.1%
10,000 to 25,000	11.9%
25,000 to 50,000	6.5%
50,000 to 100,000	3.8%
100,000 to 150,000	0.5%
150,000 to 200,000	8.5%
More than 200,000	26.3%
N/D (Non-determined)	20.5%

5 / Also, regarding type of customer, figures show that most are limited companies (consistent with the points made above) and more than 9% are cooperatives (mostly in the primary sector), figures in line with our origins as a cooperative credit institution and business philosophy.

#### TYPE OF COMPANY

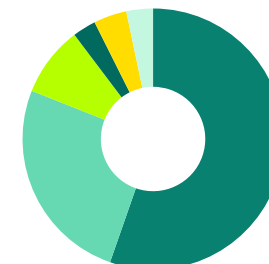
LIMITED COMPANIES	11.7%
LIMITED COMPANIES	71.1%
COOPERATIVES	5.9%
OTHER	11.4%



6 / For a deeper analysis of the real state of companies we have financed under this line, we attach two tables showing sales and number of employees in each:

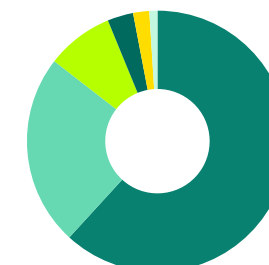
#### SALES

Less than 1 million	55.4%
1 to 10 million	25.7%
10 to 20 million	8.7%
20 to 30 million	2.9%
30 to 45 million	4.1%
45 million or more	3.3%



#### NUMBER OF EMPLOYEES

Less than 10	61.8%
10 to 50	23.7%
50 to 100	8.3%
100 to 150	3.2%
150 to 200	2.0%
More than 200	1.0%

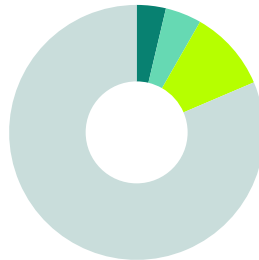


These two tables show the small scale of most companies financed by this line. 81.0% of funds went to firms with turnover of less than EUR 10 million and more than 85.5% to firms with less than 50 employees. Our financing, therefore, contributes to maintaining this important business fabric and the employment it generates.

7 / It is also important to remember that despite the small size of these companies we are in one of Spain's most industrialised regions and this is reflected in the heavy exporting activity of these businesses.

#### EXPORT/IMPORT

IMPORTING	3.7%
EXPORTING	4.6%
BOTH	10.3%
NEITHER	81.5%



8 / Finally, to illustrate the diversification of financing granted, we include below a table of the different sectors to which the companies we have financed belong, by financing granted.

#### SECTORS OF ACTIVITY

Agriculture, livestock, forestry and fisheries	5.0%
Manufacturing	15.7%
Construction	16.8%
Wholesale and retail commerce	8.1%
Transport and warehousing	5.3%
Hospitality	7.8%
Financial and insurance business	5.0%
Property	14.0%
Professionals, scientific and technical	3.5%
Administration and auxiliary services	7.7%
Health and social services	2.0%
Artistic creation, sports and entertainment	2.2%
Other/NA	6.6%

#### COVID-19 AND UKRAINE FINANCING

Through its different financing lines, working in collaboration the central and regional governments, Caja Rural de Navarra has provided substantial funds, keeping many companies of all sizes in business and supporting self-employed workers, so helping maintain employment throughout the crises brought on by the Covid-19 pandemic and Russia's invasion of Ukraine.

Specifically, EUR 471 million was lent in 5,629 transactions.

This finance had a massive positive impact in mitigating the impact of the two crises and sustaining jobs in our regions, particularly in small and medium-sized enterprises.

### 03. Sustainable finance instruments (liabilities)

Caja Rural de Navarra has been active in wholesale markets with issues of sustainable financial instruments (bonds or loans) that comply with the Sustainable Financing Framework:

- EUR 90 million of European Investment Bank loans taken out in 2018 and 2019 to fund lending to SMEs that combat climate change by improving energy efficiency.
- A EUR 600 million Sustainable mortgage-backed covered bond (European covered bond (Premium)) maturing in 2025.
- A EUR 500 million Green mortgage-backed covered bond (European covered bond (Premium)) maturing in 2027.
- A EUR 500 million Green mortgage-backed covered bond (European covered bond (Premium)) maturing in 2029.



## 04.

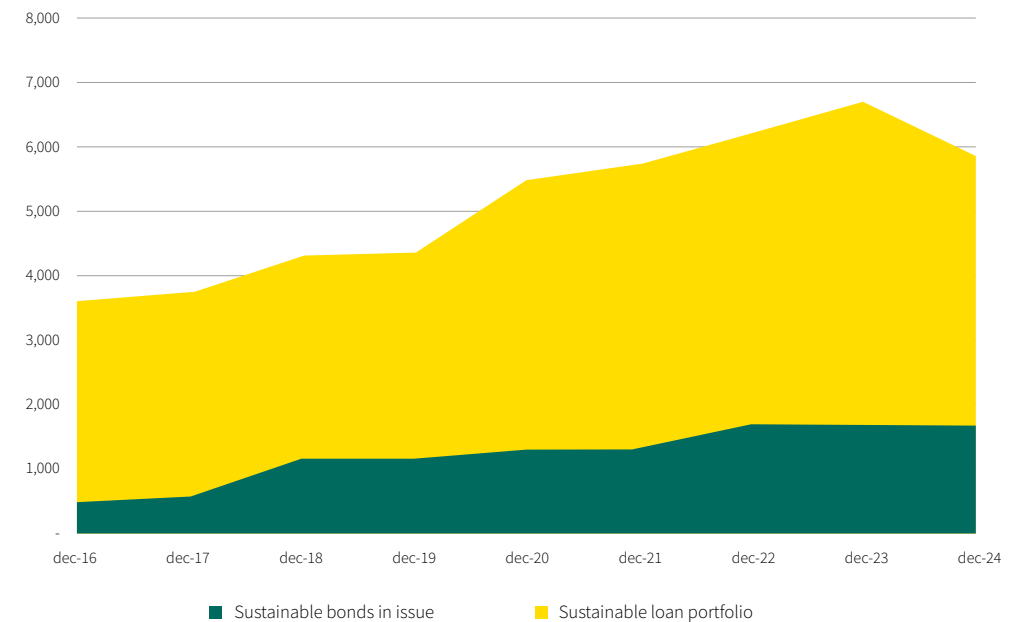
# Allocation of Caja Rural de Navarra's sustainable assets and liabilities

At 31 December 2024 the sustainable portfolio totalled more than EUR 5,000 million, which was allocated as follows<sup>1</sup>:

Sustainable finance lines	ASSETS (EUR)	LIABILITIES AND EQUITY (EUR)	Allocation of sustainable finance
Sustainable farming	13,276,363	500,000,000	Mortgage covered bond CRUNAV 3.00 26/04/2027
Renewable energy	89,076,822	500,000,000	Mortgage covered bond CRUNAV 0.750 16/02/2029
Energy efficiency	1,544,930,079	600,000,000	Mortgage covered bond CRUNAV 0.875 08/05/2025
Sustainable forestry	3,604,152	40,000,000	EIB loan to SMEs (2018)
Waste management	11,096,935	10,000,000	EIB loan for SMEs and climate change (2018)
Social housing	345,063,590	40,000,000	EIB loan to SMEs (2019)
Social inclusion	20,172,645		
Education	23,909,315		
Economic inclusion	2,115,072,978		
		2,476,202,880	Unassigned sustainable portfolio
<b>Total Sustainable Portfolio</b>	<b>4,166,202,880</b>	<b>4,166,202,880</b>	<b>Maximum potential Sustainable Finance</b>

Caja Rural de Navarra is committed to growing its sustainable finance lines. It has therefore set a target that outstanding sustainable finance

since the launch of the Sustainable Financing Framework will be higher than the sustainable bonds issued as follows:



Millions of euros

<sup>1</sup> Los datos incluidos corresponden a financiación sostenible concedida por Caja Rural de Navarra, y viva a 31 de diciembre de 2024



## 05.

# Ratings, labels and certifications

Sustainalytics<sup>1</sup>, the leading ESG rating company, has given Caja Rural de Navarra an ESG rating ever since its first sustainable mortgage covered bonds were issued in 2018.

At the start of 2025, Sustainalytics gave Caja Rural de Navarra an ESG risk rating of Low; among the best in the financial sector.

Caja Rural de Navarra publishes quarterly analyses of its loan book data confirming it is following the standards set by the Covered Bond Label<sup>2</sup>, which guarantees transparency to investors and allows easy comparison of results against other labelled entities.

Outstanding issues of covered bonds are identified by the European Mortgage Federation-European Covered Bond Council (EMF-ECBC) yellow star on a blue background (European Covered Bond (Premium)) as compliant with the European Covered Bond Directive and, also, the green leaf as sustainable/green.

The ESG teams at DZ Bank (German cooperative banking group) analysed the full range of sustainability issues affecting Caja Rural de Navarra and awarded it the DZ Bank Sustainability certification with above-average scores in all four areas considered: Economy, Environment, Social and Governance.



Besides adhering to these certifications and standards, Caja Rural de Navarra takes part in a range of international initiatives and working groups to develop green finance and to promote energy efficient homes which meet the environmental and social goals set out in the UN Paris Agreement, including stimulating investment and creating employment:

- EeMAP-EEMI<sup>3</sup> (“Energy Efficient Mortgage Action Plan-Energy Efficient Mortgage Initiative”)
- Energy efficient mortgage label<sup>4</sup>



## Caja Rural de Navarra S.Coop

Industry Group: Banks

Country/Region: Spain

Identifier: -

Caja Rural de Navarra SCC operates as a bank. It offers various banking services personal loans, credit cards, savings, insurance, deposits. The bank provides all kinds of lending, deposit, and service activities. Caja Rural de Navarra Group is retail banking, with no other significant lines of business.

Full time employees: 1,500

### ESG Risk Rating

COMPREHENSIVE ?

12.0 Low Risk



Last Full Update: Jan 6, 2025 ?

Last Update: Mar 31, 2025 ?

### Ranking

Industry Group (1st = lowest risk)

Banks 58 out of 1018

Universe

Global Universe 597 out of 14670

<sup>1</sup> <https://www.sustainalytics.com/esg-rating/caja-rural-de-navarra-scc/1013721989>

<sup>2</sup> <https://www.coveredbondlabel.com/issuer/118-caja-rural-de-navarra-sociedad-coop-de-credito>

<sup>3</sup> <https://energyefficientmortgages.eu/>

<sup>4</sup> <https://www.energy-efficient-mortgage-label.org/#>

# Annex IX

## The taxonomy relates only to financial information

<b>1</b>	<b>GAR000 - Key performance indicators (KPIs)</b>	<b>224</b>
<b>2</b>	<b>GAR001 - Cape</b>	<b>225</b>
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<b>8</b>	<b>GAR002 - Capex</b>	<b>393</b>

<b>9</b>	<b>GAR002 - Turnover</b>	<b>408</b>
<b>10</b>	<b>GAR003 - Capex</b>	<b>421</b>
<b>11</b>	<b>GAR003 - Turnover</b>	<b>435</b>
<b>12</b>	<b>GAR003 - T-1 Capex</b>	<b>449</b>
<b>13</b>	<b>GAR003 - T-1 Turnover</b>	<b>463</b>
<b>14</b>	<b>GAR004 - Capex</b>	<b>477</b>
<b>15</b>	<b>GAR004 - Turnover</b>	<b>491</b>

The taxonomy relates only to financial information in accordance with the CSRD Regulation's distinction between financial and non-financial fields, although the financial dimension is of most relevance to the Group's business activities..

## GAR000 - Key performance indicators (KPIs)

		Total environmentally sustainable assets (Turnover)		Total environmentally sustainable assets (Capex)		Key performance indicator (Turnover)		Key performance indicator (Capex)		% 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)	
Main key performance indicator	Green asset ratio (GAR) stock	1A	581.618.254,89	1AA	603.242.300,73	1B		1B		1D	76,60	1E	45,10	1F	23,40
		Total environmentally sustainable assets (Turnover)		Total environmentally sustainable assets (Capex)		Key performance indicator (Turnover)		Key performance indicator (Capex)		% 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)	
Additional KPIs	GAR (flow)	3A	216.973.984,94	3AA	213.980.401,03	3B		3C		3D	67,32	3E	44,68	3F	32,68
	Trading book	4A	0,00	4AA	0,00	4B	0,00	4C	0,00						
	Financial guarantees	5A	0,00	5AA	0,00	5B	0,00	5C	0,00						
	Assets under management (stock)	6A	0,00	6AA	0,00	6B	0,00	6C	0,00						
	Financial guarantees (flow)	5A_F	0,00	5AA_F	0,00	5B_F	0,00	5C_F	0,00						
	Assets under management (flow)	6A_F	0,00	6AA_F	0,00	6B_F	0,00	6C_F	0,00						
	Fees and commission income	7A	0,00	7AA	0,00	7B	0,00	7C	0,00						

**GAR001 - Capex**

Disclosure reference date T														
EUR m		Total (net) carrying amount	Climate Change Mitigation (CCM)											
			Total (gross) carrying amount	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	
		Additional column (non-official)	a	b	c	d	e	f						
	GAR - Assets included in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1XA 5,479,279,777.64	1A 5,537,783,673.95	1B 4,944,689,553.24	1C 601,866,166.58	1D 538,062,606.12	1E 6,036,102.84	1F 37,360,371.55						
2	Financial undertakings	2XA 171,813,562.33	2A 171,580,570.79	2B 41,552,997.52	2C 4,152,522.55	2D 0.00	2E 1,902,600.80	2F 167,985.43						
3	Credit institutions	3XA 167,700,279.60	3A 167,456,875.72	3B 41,531,966.68	3C 4,131,491.71	3D 0.00	3E 1,902,188.43	3F 162,212.25						
4	Loans and advances	4XA 0.00	4A 0.00	4B 0.00	4C 0.00	4D 0.00	4E 0.00	4F 0.00						
5	Debt securities, including UoP	5XA 166,298,921.47	5A 166,055,517.59	5B 40,915,896.26	5C 4,068,772.42	5D 0.00	5E 1,901,925.36	5F 155,910.22						
6	Equity instruments	6XA 1,401,358.13	6A 1,401,358.13	6B 616,070.41	6C 62,719.29		6E 263.07	6F 6,302.04						
7	Other financial corporations	7XA 4,113,282.73	7A 4,123,695.07	7B 21,030.84	7C 21,030.84	7D 0.00	7E 412.37	7F 5,773.17						
8	Of which: investment firms	8XA 0.00	8A 0.00	8B 0.00	8C 0.00	8D 0.00	8E 0.00	8F 0.00						
9	Loans and advances	9XA 0.00	9A 0.00	9B 0.00	9C 0.00	9D 0.00	9E 0.00	9F 0.00						
10	Debt securities, including UoP	10XA 0.00	10A 0.00	10B 0.00	10C 0.00	10D 0.00	10E 0.00	10F 0.00						
11	Equity instruments	11XA 0.00	11A 0.00	11B 0.00	11C 0.00		11E 0.00	11F 0.00						
12	Of which: management companies	12XA 0.00	12A 0.00	12B 0.00	12C 0.00	12D 0.00	12E 0.00	12F 0.00						
13	Loans and advances	13XA 0.00	13A 0.00	13B 0.00	13C 0.00	13D 0.00	13E 0.00	13F 0.00						
14	Debt securities, including UoP	14XA 0.00	14A 0.00	14B 0.00	14C 0.00	14D 0.00	14E 0.00	14F 0.00						
15	Equity instruments	15XA 0.00	15A 0.00	15B 0.00	15C 0.00		15E 0.00	15F 0.00						

**GAR001 - Capex**

16	Of which: insurance undertakings	16X A	4,113,282.73	16A	4,123,695.07	16B	21,030.84	16C	21,030.84	16D	0.00	16E	412.37	16F	5,773.17
17	Loans and advances	17X A	0.00	17A	0.00	17B	0.00	17C	0.00	17D	0.00	17E	0.00	17F	0.00
18	Debt securities, including UoP	18X A	4,113,282.73	18A	4,123,695.07	18B	21,030.84	18C	21,030.84	18D	0.00	18E	412.37	18F	5,773.17
19	Equity instruments	19X A	0.00	19A	0.00	19B	0.00	19C	0.00			19E	0.00	19F	0.00
20	Non-financial undertakings	20X A	546,804,962.12	20A	568,591,599.53	20B	105,525,052.09	20C	59,651,037.91	20D	0.00	20E	4,133,502.04	20F	37,192,386.12
21	Loans and advances	21X A	473,045,123.24	21A	494,381,735.48	21B	65,849,732.31	21C	38,708,577.90	21D	0.00	21E	2,625,180.96	21F	26,534,620.55
22	Debt securities, including UoP	22X A	61,754,866.70	22A	62,204,891.87	22B	34,342,331.06	22C	19,263,334.10	22D	0.00	22E	1,490,815.25	22F	9,497,639.12
23	Equity instruments	23X A	12,004,972.18	23A	12,004,972.18	23B	5,332,988.71	23C	1,679,125.91			23E	17,505.84	23F	1,160,126.46
24	Households	24X A	4,760,661,253.19	24A	4,797,611,503.63	24B	4,797,611,503.63	24C	538,062,606.12	24D	538,062,606.12	24E	0.00	24F	0.00
25	Of which: loans collateralised by residential immovable property	25X A	4,524,011,436.82	25A	4,555,747,209.73	25B	4,555,747,209.73	25C	530,343,351.31	25D	530,343,351.31	25E	0.00	25F	0.00
26	Of which: building renovation loans	26X A	192,176,536.83	26A	196,094,395.55	26B	196,094,395.55	26C	7,719,254.81	26D	7,719,254.81	26E	0.00	26F	0.00
27	Of which: motor vehicle loans	27X A	44,473,279.54	27A	45,769,898.35	27B	45,769,898.35	27C	0.00	27D	0.00	27E	0.00	27F	0.00
28	Local governments financing	28X A	0.00	28A	0.00	28B	0.00	28C	0.00	28D	0.00	28E	0.00	28F	0.00
29	Housing financing	29X A	0.00	29A	0.00	29B	0.00	29C	0.00	29D	0.00	29E	0.00	29F	0.00
30	Local governments financing	30X A	0.00	30A	0.00	30B	0.00	30C	0.00	30D	0.00	30E	0.00	30F	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31X A	9,046,290.02	31A	10,977,803.98	31B	10,977,803.98	31C	0.00	31D	0.00	31E	0.00	31F	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32X A	7,720,143,653.65	32A	7,945,684,346.93	32B	0.00	32C	0.00	32D	0.00	32E	0.00	32F	0.00
33	Financial and Non-financial undertakings	33X A	4,970,262,721.49	33A	5,107,993,496.98										
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34X A	4,808,708,021.18	34A	4,943,953,558.40										
35	Loans and advances	35X A	3,582,856,961.57	35A	3,717,775,407.19										
36	Of which: loans collateralised by commercial immovable property	36X A	788,825,630.15	36A	806,895,830.21										
37	Of which: building renovation loans	37X A	13,525,182.35	37A	13,916,704.00										
38	Debt securities	38X A	818,445,920.01	38A	818,773,011.60										

**GAR001 - Capex**

39	Equity instruments	39X A	407,405,139.61	39A	407,405,139.61										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	40X A	161,554,700.31	40A	164,039,938.58										
41	Loans and advances	41X A	23,250,661.77	41A	25,427,057.61										
42	Debt securities	42X A	137,516,322.22	42A	137,825,164.65										
43	Equity instruments	43X A	787,716.32	43A	787,716.32										
44	Derivatives	44X A	2,517,192.25	44A	2,517,192.25										
45	On demand interbank loans	45X A	1,176,077,809.49	45A	1,176,077,809.49										
46	Cash and cash-related assets	46X A	91,987,150.14	46A	91,987,150.14										
47	Other categories of assets (e.g. goodwill, commodities etc.)	47X A	1,479,298,780.27	47A	1,567,108,698.08										
48	Total GAR assets	48X A	13,208,469,721.30	48A	13,494,445,824.86	48B	4,955,667,357.22	48C	601,866,166.58	48D	538,062,606.12	48E	6,036,102.84	48F	37,360,371.55
49	Assets not covered for GAR calculation	49X A	4,124,494,756.28	49A	4,121,765,619.89										
50	Central government and Supranational issuers	50X A	2,618,527,124.50	50A	2,615,799,406.99										
51	Central banks exposure	51X A	1,500,128,175.33	51A	1,500,126,756.45										
52	Trading book	52X A	5,839,456.45	52A	5,839,456.45										
53	Total assets	53X A	17,332,964,477.58	53A	17,616,211,444.75	53B	4,955,667,357.22	53C	601,866,166.58	53D	538,062,606.12	53E	6,036,102.84	53F	37,360,371.55
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations														
54	Financial guarantees	55X A	78,230,063.35	55A	78,230,063.35	55B	0.00	55C	0.00	55D	0.00	55E	0.00	55F	0.00
55	Assets under management	56X A	0.00	56A	0.00	56B	0.00	56C	0.00	56D	0.00	56E	0.00	56F	0.00
56	Of which: debt securities	57X A	0.00	57A	0.00	57B	0.00	57C	0.00	57D	0.00	57E	0.00	57F	0.00
57	Of which: equity instruments	58X A	0.00	58A	0.00	58B	0.00	58C	0.00	58D	0.00	58E	0.00	58F	0.00

Disclosure reference date T														
Climate Change Adaptation (CCA)														
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)													



**GAR001 - Capex**

				Of which environmentally sustainable (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
						i		j	
		g		h					
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1G	2,090,974.05	1H	177,730.54	1I	0.00	1J	164,195.16
2	Financial undertakings	2G	1,741,413.02	2H	167,143.05	2I	0.00	2J	164,195.16
3	Credit institutions	3G	154,202.79	3H	56,628.03	3I	0.00	3J	54,092.50
4	Loans and advances	4G	0.00	4H	0.00	4I	0.00	4J	0.00
5	Debt securities, including UoP	5G	152,452.36	5H	56,102.90	5I	0.00	5J	54,092.50
6	Equity instruments	6G	1,750.42	6H	525.13			6J	0.00
7	Other financial corporations	7G	1,587,210.23	7H	110,515.03	7I	0.00	7J	110,102.66
8	Of which: investment firms	8G	0.00	8H	0.00	8I	0.00	8J	0.00
9	Loans and advances	9G	0.00	9H	0.00	9I	0.00	9J	0.00
10	Debt securities, including UoP	10G	0.00	10H	0.00	10I	0.00	10J	0.00
11	Equity instruments	11G	0.00	11H	0.00			11J	0.00
12	Of which: management companies	12G	0.00	12H	0.00	12I	0.00	12J	0.00
13	Loans and advances	13G	0.00	13H	0.00	13I	0.00	13J	0.00
14	Debt securities, including UoP	14G	0.00	14H	0.00	14I	0.00	14J	0.00
15	Equity instruments	15G	0.00	15H	0.00			15J	0.00
16	Of which: insurance undertakings	16G	1,587,210.23	16H	110,515.03	16I	0.00	16J	110,102.66
17	Loans and advances	17G	0.00	17H	0.00	17I	0.00	17J	0.00
18	Debt securities, including UoP	18G	1,587,210.23	18H	110,515.03	18I	0.00	18J	110,102.66
19	Equity instruments	19G	0.00	19H	0.00			19J	0.00
20	Non-financial undertakings	20G	349,561.02	20H	10,587.49	20I	0.00	20J	0.00
21	Loans and advances	21G	6,078.18	21H	0.00	21I	0.00	21J	0.00
22	Debt securities, including UoP	22G	342,082.94	22H	10,587.49	22I	0.00	22J	0.00

**GAR001 - Capex**

23	Equity instruments	23G	1,399.91	23H	0.00			23J	0.00
24	Households	24G	0.00	24H	0.00	24I	0.00	24J	0.00
25	Of which: loans collateralised by residential immovable property	25G	0.00	25H	0.00	25I	0.00	25J	0.00
26	Of which: building renovation loans	26G	0.00	26H	0.00	26I	0.00	26J	0.00
27	Of which: motor vehicle loans								
28	Local governments financing	28G	0.00	28H	0.00	28I	0.00	28J	0.00
29	Housing financing	29G	0.00	29H	0.00	29I	0.00	29J	0.00
30	Local governments financing	30G	0.00	30H	0.00	30I	0.00	30J	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31G	0.00	31H	0.00	31I	0.00	31J	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32G	0.00	32H	0.00	32I	0.00	32J	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48G	2,090,974.05	48H	177,730.54	48I	0.00	48J	164,195.16

**GAR001 - Capex**

49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53G	2,090,974.05	53H	177,730.54	53I	0.00	53J	164,195.16
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55G	0.00	55H	0.00	55I	0.00	55J	0.00
55	Assets under management	56G	0.00	56H	0.00	56I	0.00	56J	0.00
56	Of which: debt securities	57G	0.00	57H	0.00	57I	0.00	57J	0.00
57	Of which: equity instruments	58G	0.00	58H	0.00	58I	0.00	58J	0.00

Disclosure reference date T									
Water and Marine Resources (WTR)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
				Of which environmentally sustainable (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
				k	l	m		n	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1K	1,690,239.39	1L	1,178,002.78	1M	0.00	1N	0.00
2	Financial undertakings	2K	0.00	2L	0.00	2M	0.00	2N	0.00
3	Credit institutions	3K	0.00	3L	0.00	3M	0.00	3N	0.00
4	Loans and advances	4K	0.00	4L	0.00	4M	0.00	4N	0.00
5	Debt securities, including UoP	5K	0.00	5L	0.00	5M	0.00	5N	0.00
6	Equity instruments	6K	0.00	6L	0.00			6N	0.00
7	Other financial corporations	7K	0.00	7L	0.00	7M	0.00	7N	0.00

**GAR001 - Capex**

8	Of which: investment firms	8K	0.00	8L	0.00	8M	0.00	8N	0.00
9	Loans and advances	9K	0.00	9L	0.00	9M	0.00	9N	0.00
10	Debt securities, including UoP	10K	0.00	10L	0.00	10M	0.00	10N	0.00
11	Equity instruments	11K	0.00	11L	0.00			11N	0.00
12	Of which: management companies	12K	0.00	12L	0.00	12M	0.00	12N	0.00
13	Loans and advances	13K	0.00	13L	0.00	13M	0.00	13N	0.00
14	Debt securities, including UoP	14K	0.00	14L	0.00	14M	0.00	14N	0.00
15	Equity instruments	15K	0.00	15L	0.00			15N	0.00
16	Of which: insurance undertakings	16K	0.00	16L	0.00	16M	0.00	16N	0.00
17	Loans and advances	17K	0.00	17L	0.00	17M	0.00	17N	0.00
18	Debt securities, including UoP	18K	0.00	18L	0.00	18M	0.00	18N	0.00
19	Equity instruments	19K	0.00	19L	0.00			19N	0.00
20	Non-financial undertakings	20K	1,690,239.39	20L	1,178,002.78	20M	0.00	20N	0.00
21	Loans and advances	21K	213,401.48	21L	0.00	21M	0.00	21N	0.00
22	Debt securities, including UoP	22K	1,476,837.90	22L	1,178,002.78	22M	0.00	22N	0.00
23	Equity instruments	23K	0.00	23L	0.00			23N	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28K	0.00	28L	0.00	28M	0.00	28N	0.00
29	Housing financing	29K	0.00	29L	0.00	29M	0.00	29N	0.00
30	Local governments financing	30K	0.00	30L	0.00	30M	0.00	30N	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31K	0.00	31L	0.00	31M	0.00	31N	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32K	0.00	32L	0.00	32M	0.00	32N	0.00
33	Financial and Non-financial undertakings								

**GAR001 - Capex**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48K	1,690,239.39	48L	1,178,002.78	48M	0.00	48N	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53K	1,690,239.39	53L	1,178,002.78	53M	0.00	53N	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55K	0.00	55L	0.00	55M	0.00	55N	0.00
55	Assets under management	56K	0.00	56L	0.00	56M	0.00	56N	0.00
56	Of which: debt securities	57K	0.00	57L	0.00	57M	0.00	57N	0.00
57	Of which: equity instruments	58K	0.00	58L	0.00	58M	0.00	58N	0.00

**GAR001 - Capex**

Disclosure reference date T									
Circular Economy (CE)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
				Of which environmentally sustainable (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
						o	p	q	r
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1O	1,488,534.30	1P	20,400.82	1Q	0.00	1R	16,461.48
2	Financial undertakings	2O	0.00	2P	0.00	2Q	0.00	2R	0.00
3	Credit institutions	3O	0.00	3P	0.00	3Q	0.00	3R	0.00
4	Loans and advances	4O	0.00	4P	0.00	4Q	0.00	4R	0.00
5	Debt securities, including UoP	5O	0.00	5P	0.00	5Q	0.00	5R	0.00
6	Equity instruments	6O	0.00	6P	0.00			6R	0.00
7	Other financial corporations	7O	0.00	7P	0.00	7Q	0.00	7R	0.00
8	Of which: investment firms	8O	0.00	8P	0.00	8Q	0.00	8R	0.00
9	Loans and advances	9O	0.00	9P	0.00	9Q	0.00	9R	0.00
10	Debt securities, including UoP	10O	0.00	10P	0.00	10Q	0.00	10R	0.00
11	Equity instruments	11O	0.00	11P	0.00			11R	0.00
12	Of which: management companies	12O	0.00	12P	0.00	12Q	0.00	12R	0.00
13	Loans and advances	13O	0.00	13P	0.00	13Q	0.00	13R	0.00
14	Debt securities, including UoP	14O	0.00	14P	0.00	14Q	0.00	14R	0.00
15	Equity instruments	15O	0.00	15P	0.00			15R	0.00
16	Of which: insurance undertakings	16O	0.00	16P	0.00	16Q	0.00	16R	0.00
17	Loans and advances	17O	0.00	17P	0.00	17Q	0.00	17R	0.00
18	Debt securities, including UoP	18O	0.00	18P	0.00	18Q	0.00	18R	0.00



**GAR001 - Capex**

19	Equity instruments	19O	0.00	19P	0.00			19R	0.00
20	Non-financial undertakings	20O	1,488,534.30	20P	20,400.82	20Q	0.00	20R	16,461.48
21	Loans and advances	21O	613,161.43	21P	0.00	21Q	0.00	21R	0.00
22	Debt securities, including UoP	22O	365,482.86	22P	20,400.82	22Q	0.00	22R	16,461.48
23	Equity instruments	23O	509,890.00	23P	0.00			23R	0.00
24	Households	24O	0.00	24P	0.00	24Q	0.00	24R	0.00
25	Of which: loans collateralised by residential immovable property	25O	0.00	25P	0.00	25Q	0.00	25R	0.00
26	Of which: building renovation loans	26O	0.00	26P	0.00	26Q	0.00	26R	0.00
27	Of which: motor vehicle loans								
28	Local governments financing	28O	0.00	28P	0.00	28Q	0.00	28R	0.00
29	Housing financing	29O	0.00	29P	0.00	29Q	0.00	29R	0.00
30	Local governments financing	30O	0.00	30P	0.00	30Q	0.00	30R	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31O	0.00	31P	0.00	31Q	0.00	31R	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32O	0.00	32P	0.00	32Q	0.00	32R	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								

**GAR001 - Capex**

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	48O	1,488,534.30	48P	20,400.82	48Q	0.00	48R	16,461.48
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53O	1,488,534.30	53P	20,400.82	53Q	0.00	53R	16,461.48
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55O	0.00	55P	0.00	55Q	0.00	55R	0.00
55	Assets under management	56O	0.00	56P	0.00	56Q	0.00	56R	0.00
56	Of which: debt securities	57O	0.00	57P	0.00	57Q	0.00	57R	0.00
57	Of which: equity instruments	58O	0.00	58P	0.00	58Q	0.00	58R	0.00

Disclosure reference date T									
Pollution Prevention and Control (PPC)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
		Of which: use of proceeds				Of which: enabling			
		s	t	u	v				
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1S	807,404.18	1T	0.00	1U	0.00	1V	0.00
2	Financial undertakings	2S	0.00	2T	0.00	2U	0.00	2V	0.00

**GAR001 - Capex**

3	Credit institutions	3S	0.00	3T	0.00	3U	0.00	3V	0.00
4	Loans and advances	4S	0.00	4T	0.00	4U	0.00	4V	0.00
5	Debt securities, including UoP	5S	0.00	5T	0.00	5U	0.00	5V	0.00
6	Equity instruments	6S	0.00	6T	0.00			6V	0.00
7	Other financial corporations	7S	0.00	7T	0.00	7U	0.00	7V	0.00
8	Of which: investment firms	8S	0.00	8T	0.00	8U	0.00	8V	0.00
9	Loans and advances	9S	0.00	9T	0.00	9U	0.00	9V	0.00
10	Debt securities, including UoP	10S	0.00	10T	0.00	10U	0.00	10V	0.00
11	Equity instruments	11S	0.00	11T	0.00			11V	0.00
12	Of which: management companies	12S	0.00	12T	0.00	12U	0.00	12V	0.00
13	Loans and advances	13S	0.00	13T	0.00	13U	0.00	13V	0.00
14	Debt securities, including UoP	14S	0.00	14T	0.00	14U	0.00	14V	0.00
15	Equity instruments	15S	0.00	15T	0.00			15V	0.00
16	Of which: insurance undertakings	16S	0.00	16T	0.00	16U	0.00	16V	0.00
17	Loans and advances	17S	0.00	17T	0.00	17U	0.00	17V	0.00
18	Debt securities, including UoP	18S	0.00	18T	0.00	18U	0.00	18V	0.00
19	Equity instruments	19S	0.00	19T	0.00			19V	0.00
20	Non-financial undertakings	20S	807,404.18	20T	0.00	20U	0.00	20V	0.00
21	Loans and advances	21S	14.63	21T	0.00	21U	0.00	21V	0.00
22	Debt securities, including UoP	22S	729,299.16	22T	0.00	22U	0.00	22V	0.00
23	Equity instruments	23S	78,090.39	23T	0.00			23V	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28S	0.00	28T	0.00	28U	0.00	28V	0.00
29	Housing financing	29S	0.00	29T	0.00	29U	0.00	29V	0.00
30	Local governments financing	30S	0.00	30T	0.00	30U	0.00	30V	0.00

**GAR001 - Capex**

31	Collateral obtained by taking possession: residential and commercial immovable properties	31S	0.00	31T	0.00	31U	0.00	31V	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32S	0.00	32T	0.00	32U	0.00	32V	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48S	807,404.18	48T	0.00	48U	0.00	48V	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53S	807,404.18	53T	0.00	53U	0.00	53V	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55S	0.00	55T	0.00	55U	0.00	55V	0.00

**GAR001 - Capex**

55	Assets under management	56S	0.00	56T	0.00	56U	0.00	56V	0.00
56	Of which: debt securities	57S	0.00	57T	0.00	57U	0.00	57V	0.00
57	Of which: equity instruments	58S	0.00	58T	0.00	58U	0.00	58V	0.00

Disclosure reference date T									
Biodiversity and ecosystems (BIO)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		k		l		m		n	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1W	26,914.16	1X	0.00	1Y	0.00	1Z	0.00
2	Financial undertakings	2W	0.00	2X	0.00	2Y	0.00	2Z	0.00
3	Credit institutions	3W	0.00	3X	0.00	3Y	0.00	3Z	0.00
4	Loans and advances	4W	0.00	4X	0.00	4Y	0.00	4Z	0.00
5	Debt securities, including UoP	5W	0.00	5X	0.00	5Y	0.00	5Z	0.00
6	Equity instruments	6W	0.00	6X	0.00			6Z	0.00
7	Other financial corporations	7W	0.00	7X	0.00	7Y	0.00	7Z	0.00
8	Of which: investment firms	8W	0.00	8X	0.00	8Y	0.00	8Z	0.00
9	Loans and advances	9W	0.00	9X	0.00	9Y	0.00	9Z	0.00
10	Debt securities, including UoP	10W	0.00	10X	0.00	10Y	0.00	10Z	0.00
11	Equity instruments	11W	0.00	11X	0.00			11Z	0.00
12	Of which: management companies	12W	0.00	12X	0.00	12Y	0.00	12Z	0.00
13	Loans and advances	13W	0.00	13X	0.00	13Y	0.00	13Z	0.00

**GAR001 - Capex**

14	Debt securities, including UoP	14W	0.00	14X	0.00	14Y	0.00	14Z	0.00
15	Equity instruments	15W	0.00	15X	0.00			15Z	0.00
16	Of which: insurance undertakings	16W	0.00	16X	0.00	16Y	0.00	16Z	0.00
17	Loans and advances	17W	0.00	17X	0.00	17Y	0.00	17Z	0.00
18	Debt securities, including UoP	18W	0.00	18X	0.00	18Y	0.00	18Z	0.00
19	Equity instruments	19W	0.00	19X	0.00			19Z	0.00
20	Non-financial undertakings	20W	26,914.16	20X	0.00	20Y	0.00	20Z	0.00
21	Loans and advances	21W	427.16	21X	0.00	21Y	0.00	21Z	0.00
22	Debt securities, including UoP	22W	13,932.77	22X	0.00	22Y	0.00	22Z	0.00
23	Equity instruments	23W	12,554.22	23X	0.00			23Z	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28W	0.00	28X	0.00	28Y	0.00	28Z	0.00
29	Housing financing	29W	0.00	29X	0.00	29Y	0.00	29Z	0.00
30	Local governments financing	30W	0.00	30X	0.00	30Y	0.00	30Z	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31W	0.00	31X	0.00	31Y	0.00	31Z	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32W	0.00	32X	0.00	32Y	0.00	32Z	0.00
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								

**GAR001 - Capex**

40	Non-EU country counterparties not subject to NFRD disclosure 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	48W	26,914.16	48X	0.00	48Y	0.00	48Z	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53W	26,914.16	53X	0.00	53Y	0.00	53Z	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55W	0.00	55X	0.00	55Y	0.00	55Z	0.00
55	Assets under management	56W	0.00	56X	0.00	56Y	0.00	56Z	0.00
56	Of which: debt securities	57W	0.00	57X	0.00	57Y	0.00	57Z	0.00
57	Of which: equity instruments	58W	0.00	58X	0.00	58Y	0.00	58Z	0.00

Disclosure reference date T	
TOTAL (CCM + CCA + WMR + CE + PPC + BIO)	
Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
EUR m	Of which environmentally sustainable (Taxonomy-aligned)



**GAR001 - Capex**

						Of which: use of proceeds		Of which: transitional		Of which: enabling	
		ab		ac		ad		ae		af	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AA	4,950,793,619.30	1AB	603,242,300.73	1AC	538,062,606.12	1AD	6,036,102.84	1AE	37,541,028.19
2	Financial undertakings	2AA	43,294,410.54	2AB	4,319,665.60	2AC	0.00	2AD	1,902,600.80	2AE	332,180.59
3	Credit institutions	3AA	41,686,169.46	3AB	4,188,119.73	3AC	0.00	3AD	1,902,188.43	3AE	216,304.76
4	Loans and advances	4AA	0.00	4AB	0.00	4AC	0.00	4AD	0.00	4AE	0.00
5	Debt securities, including UoP	5AA	41,068,348.63	5AB	4,124,875.31	5AC	0.00	5AD	1,901,925.36	5AE	210,002.72
6	Equity instruments	6AA	617,820.84	6AB	63,244.42			6AD	263.07	6AE	6,302.04
7	Other financial corporations	7AA	1,608,241.08	7AB	131,545.87	7AC	0.00	7AD	412.37	7AE	115,875.83
8	Of which: investment firms	8AA	0.00	8AB	0.00	8AC	0.00	8AD	0.00	8AE	0.00
9	Loans and advances	9AA	0.00	9AB	0.00	9AC	0.00	9AD	0.00	9AE	0.00
10	Debt securities, including UoP	10AA	0.00	10AB	0.00	10AC	0.00	10AD	0.00	10AE	0.00
11	Equity instruments	11AA	0.00	11AB	0.00			11AD	0.00	11AE	0.00
12	Of which: management companies	12AA	0.00	12AB	0.00	12AC	0.00	12AD	0.00	12AE	0.00
13	Loans and advances	13AA	0.00	13AB	0.00	13AC	0.00	13AD	0.00	13AE	0.00
14	Debt securities, including UoP	14AA	0.00	14AB	0.00	14AC	0.00	14AD	0.00	14AE	0.00
15	Equity instruments	15AA	0.00	15AB	0.00			15AD	0.00	15AE	0.00
16	Of which: insurance undertakings	16AA	1,608,241.08	16AB	131,545.87	16AC	0.00	16AD	412.37	16AE	115,875.83
17	Loans and advances	17AA	0.00	17AB	0.00	17AC	0.00	17AD	0.00	17AE	0.00
18	Debt securities, including UoP	18AA	1,608,241.08	18AB	131,545.87	18AC	0.00	18AD	412.37	18AE	115,875.83
19	Equity instruments	19AA	0.00	19AB	0.00			19AD	0.00	19AE	0.00
20	Non-financial undertakings	20AA	109,887,705.13	20AB	60,860,029.00	20AC	0.00	20AD	4,133,502.04	20AE	37,208,847.60
21	Loans and advances	21AA	66,682,815.20	21AB	38,708,577.90	21AC	0.00	21AD	2,625,180.96	21AE	26,534,620.55

**GAR001 - Capex**

22	Debt securities, including UoP	22AA	37,269,966.70	22AB	20,472,325.19	22AC	0.00	22AD	1,490,815.25	22AE	9,514,100.60
23	Equity instruments	23AA	5,934,923.23	23AB	1,679,125.91			23AD	17,505.84	23AE	1,160,126.46
24	Households	24AA	4,797,611,503.63	24AB	538,062,606.12	24AC	538,062,606.12	24AD	0.00	24AE	0.00
25	Of which: loans collateralised by residential immovable property	25AA	4,555,747,209.73	25AB	530,343,351.31	25AC	530,343,351.31	25AD	0.00	25AE	0.00
26	Of which: building renovation loans	26AA	196,094,395.55	26AB	7,719,254.81	26AC	7,719,254.81	26AD	0.00	26AE	0.00
27	Of which: motor vehicle loans	27AA	45,769,898.35	27AB	0.00	27AC	0.00	27AD	0.00	27AE	0.00
28	Local governments financing	28AA	0.00	28AB	0.00	28AC	0.00	28AD	0.00	28AE	0.00
29	Housing financing	29AA	0.00	29AB	0.00	29AC	0.00	29AD	0.00	29AE	0.00
30	Local governments financing	30AA	0.00	30AB	0.00	30AC	0.00	30AD	0.00	30AE	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AA	10,977,803.98	31AB	0.00	31AC	0.00	31AD	0.00	31AE	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AA	0.00	32AB	0.00	32AC	0.00	32AD	0.00	32AE	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations										
41	Loans and advances										
42	Debt securities										
43	Equity instruments										

**GAR001 - Turnover**

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	48AA	4,961,771,423.28	48AB	603,242,300.73	48AC	538,062,606.12	48AD	6,036,102.84	48AE	37,541,028.19
49	Assets not covered for GAR calculation										
50	Central government and Supranational issuers										
51	Central banks exposure										
52	Trading book										
53	Total assets	53AA	4,961,771,423.28	53AB	603,242,300.73	53AC	538,062,606.12	53AD	6,036,102.84	53AE	37,541,028.19
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations										
54	Financial guarantees	55AA	0.00	55AB	0.00	55AC	0.00	55AD	0.00	55AE	0.00
55	Assets under management	56AA	0.00	56AB	0.00	56AC	0.00	56AD	0.00	56AE	0.00
56	Of which: debt securities	57AA	0.00	57AB	0.00	57AC	0.00	57AD	0.00	57AE	0.00
57	Of which: equity instruments	58AA	0.00	58AB	0.00	58AC	0.00	58AD	0.00	58AE	0.00

**GAR001 - Turnover**

Disclosure reference date T			
EUR m	Total (net) carrying amount	Total (gross) carrying amount	Climate Change Mitigation (CCM)
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)

**GAR001 - Turnover**

										Of which environmentally sustainable (Taxonomy-aligned)							
												Of which: use of proceeds		Of which: transitional		Of which: enabling	
		Additional column (non-official)		a		b		c		d		e		f			
	GAR - Assets included in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1XA	5,479,279,777.64	1A	5,537,783,673.95	1B	4,932,861,672.84	1C	580,727,208.86	1D	538,062,606.12	1E	7,167,336.39	1F	27,030,443.51		
2	Financial undertakings	2XA	171,813,562.33	2A	171,580,570.79	2B	50,506,420.29	2C	5,748,053.17	2D	0.00	2E	1,904,846.30	2F	92,927.28		
3	Credit institutions	3XA	167,700,279.60	3A	167,456,875.72	3B	50,490,750.24	3C	5,732,383.12	3D	0.00	3E	1,904,846.30	3F	90,040.70		
4	Loans and advances	4XA	0.00	4A	0.00	4B	0.00	4C	0.00	4D	0.00	4E	0.00	4F	0.00		
5	Debt securities, including UoP	5XA	166,298,921.47	5A	166,055,517.59	5B	49,894,531.48	5C	5,683,685.45	5D	0.00	5E	1,904,635.84	5F	86,434.62		
6	Equity instruments	6XA	1,401,358.13	6A	1,401,358.13	6B	596,218.76	6C	48,697.68			6E	210.46	6F	3,606.08		
7	Other financial corporations	7XA	4,113,282.73	7A	4,123,695.07	7B	15,670.04	7C	15,670.04	7D	0.00	7E	0.00	7F	2,886.59		
8	Of which: investment firms	8XA	0.00	8A	0.00	8B	0.00	8C	0.00	8D	0.00	8E	0.00	8F	0.00		
9	Loans and advances	9XA	0.00	9A	0.00	9B	0.00	9C	0.00	9D	0.00	9E	0.00	9F	0.00		
10	Debt securities, including UoP	10XA	0.00	10A	0.00	10B	0.00	10C	0.00	10D	0.00	10E	0.00	10F	0.00		
11	Equity instruments	11XA	0.00	11A	0.00	11B	0.00	11C	0.00			11E	0.00	11F	0.00		
12	Of which: management companies	12XA	0.00	12A	0.00	12B	0.00	12C	0.00	12D	0.00	12E	0.00	12F	0.00		
13	Loans and advances	13XA	0.00	13A	0.00	13B	0.00	13C	0.00	13D	0.00	13E	0.00	13F	0.00		
14	Debt securities, including UoP	14XA	0.00	14A	0.00	14B	0.00	14C	0.00	14D	0.00	14E	0.00	14F	0.00		
15	Equity instruments	15XA	0.00	15A	0.00	15B	0.00	15C	0.00			15E	0.00	15F	0.00		
16	Of which: insurance undertakings	16XA	4,113,282.73	16A	4,123,695.07	16B	15,670.04	16C	15,670.04	16D	0.00	16E	0.00	16F	2,886.59		
17	Loans and advances	17XA	0.00	17A	0.00	17B	0.00	17C	0.00	17D	0.00	17E	0.00	17F	0.00		
18	Debt securities, including UoP	18XA	4,113,282.73	18A	4,123,695.07	18B	15,670.04	18C	15,670.04	18D	0.00	18E	0.00	18F	2,886.59		
19	Equity instruments	19XA	0.00	19A	0.00	19B	0.00	19C	0.00			19E	0.00	19F	0.00		
20	Non-financial undertakings	20XA	546,804,962.12	20A	568,591,599.53	20B	84,743,748.93	20C	36,916,549.57	20D	0.00	20E	5,262,490.09	20F	26,937,516.23		

**GAR001 - Turnover**

21	Loans and advances	21X A	473,045,123.24	21A	494,381,735.48	21B	57,737,622.47	21C	27,052,299.22	21D	0.00	21E	3,724,542.11	21F	21,054,327.63
22	Debt securities, including UoP	22X A	61,754,866.70	22A	62,204,891.87	22B	23,018,429.06	22C	8,839,867.88	22D	0.00	22E	1,533,027.89	22F	5,048,463.97
23	Equity instruments	23X A	12,004,972.18	23A	12,004,972.18	23B	3,987,697.39	23C	1,024,382.48			23E	4,920.09	23F	834,724.63
24	Households	24X A	4,760,661,253.19	24A	4,797,611,503.63	24B	4,797,611,503.63	24C	538,062,606.12	24D	538,062,606.12	24E	0.00	24F	0.00
25	Of which: loans collateralised by residential immovable property	25X A	4,524,011,436.82	25A	4,555,747,209.73	25B	4,555,747,209.73	25C	530,343,351.31	25D	530,343,351.31	25E	0.00	25F	0.00
26	Of which: building renovation loans	26X A	192,176,536.83	26A	196,094,395.55	26B	196,094,395.55	26C	7,719,254.81	26D	7,719,254.81	26E	0.00	26F	0.00
27	Of which: motor vehicle loans	27X A	44,473,279.54	27A	45,769,898.35	27B	45,769,898.35	27C	0.00	27D	0.00	27E	0.00	27F	0.00
28	Local governments financing	28X A	0.00	28A	0.00	28B	0.00	28C	0.00	28D	0.00	28E	0.00	28F	0.00
29	Housing financing	29X A	0.00	29A	0.00	29B	0.00	29C	0.00	29D	0.00	29E	0.00	29F	0.00
30	Local governments financing	30X A	0.00	30A	0.00	30B	0.00	30C	0.00	30D	0.00	30E	0.00	30F	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31X A	9,046,290.02	31A	10,977,803.98	31B	10,977,803.98	31C	0.00	31D	0.00	31E	0.00	31F	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32X A	7,720,143,653.65	32A	7,945,684,346.93	32B	0.00	32C	0.00	32D	0.00	32E	0.00	32F	0.00
33	Financial and Non-financial undertakings	33X A	4,970,262,721.49	33A	5,107,993,496.98										
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34X A	4,808,708,021.18	34A	4,943,953,558.40										
35	Loans and advances	35X A	3,582,856,961.57	35A	3,717,775,407.19										
36	Of which: loans collateralised by commercial immovable property	36X A	788,825,630.15	36A	806,895,830.21										
37	Of which: building renovation loans	37X A	13,525,182.35	37A	13,916,704.00										
38	Debt securities	38X A	818,445,920.01	38A	818,773,011.60										
39	Equity instruments	39X A	407,405,139.61	39A	407,405,139.61										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	40X A	161,554,700.31	40A	164,039,938.58										
41	Loans and advances	41X A	23,250,661.77	41A	25,427,057.61										
42	Debt securities	42X A	137,516,322.22	42A	137,825,164.65										
43	Equity instruments	43X A	787,716.32	43A	787,716.32										

**GAR001 - Turnover**

44	Derivatives	44X A	2,517,192.25	44A	2,517,192.25										
45	On demand interbank loans	45X A	1,176,077,809. 49	45A	1,176,077,809. 49										
46	Cash and cash-related assets	46X A	91,987,150.14	46A	91,987,150.14										
47	Other categories of assets (e.g. goodwill, commodities etc.)	47X A	1,479,298,780. 27	47A	1,567,108,698. 08										
48	Total GAR assets	48X A	13,208,469,721 .30	48A	13,494,445,824 .86	48B	4,943,839,476. 82	48C	580,727,208.86	48D	538,062,606.12	48E	7,167,336.39	48F	27,030,443.51
49	Assets not covered for GAR calculation	49X A	4,124,494,756. 28	49A	4,121,765,619. 89										
50	Central government and Supranational issuers	50X A	2,618,527,124. 50	50A	2,615,799,406. 99										
51	Central banks exposure	51X A	1,500,128,175. 33	51A	1,500,126,756. 45										
52	Trading book	52X A	5,839,456.45	52A	5,839,456.45										
53	Total assets	53X A	17,332,964,477 .58	53A	17,616,211,444 .75	53B	4,943,839,476. 82	53C	580,727,208.86	53D	538,062,606.12	53E	7,167,336.39	53F	27,030,443.51
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations														
54	Financial guarantees	55X A	78,230,063.35	55A	78,230,063.35	55B	0.00	55C	0.00	55D	0.00	55E	0.00	55F	0.00
55	Assets under management	56X A	0.00	56A	0.00	56B	0.00	56C	0.00	56D	0.00	56E	0.00	56F	0.00
56	Of which: debt securities	57X A	0.00	57A	0.00	57B	0.00	57C	0.00	57D	0.00	57E	0.00	57F	0.00
57	Of which: equity instruments	58X A	0.00	58A	0.00	58B	0.00	58C	0.00	58D	0.00	58E	0.00	58F	0.00

Disclosure reference date T				
Climate Change Adaptation (CCA)				
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)		
			Of which: use of proceeds	Of which: enabling
	g	h	i	j

**GAR001 - Turnover**

	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1G	2,238,779.29	1H	181,756.00	1I	0.00	1J	172,104.24
2	Financial undertakings	2G	1,741,039.57	2H	169,193.40	2I	0.00	2J	165,591.62
3	Credit institutions	3G	154,241.71	3H	59,090.74	3I	0.00	3J	55,488.97
4	Loans and advances	4G	0.00	4H	0.00	4I	0.00	4J	0.00
5	Debt securities, including UoP	5G	153,454.02	5H	58,915.70	5I	0.00	5J	55,488.97
6	Equity instruments	6G	787.69	6H	175.04			6J	0.00
7	Other financial corporations	7G	1,586,797.86	7H	110,102.66	7I	0.00	7J	110,102.66
8	Of which: investment firms	8G	0.00	8H	0.00	8I	0.00	8J	0.00
9	Loans and advances	9G	0.00	9H	0.00	9I	0.00	9J	0.00
10	Debt securities, including UoP	10G	0.00	10H	0.00	10I	0.00	10J	0.00
11	Equity instruments	11G	0.00	11H	0.00			11J	0.00
12	Of which: management companies	12G	0.00	12H	0.00	12I	0.00	12J	0.00
13	Loans and advances	13G	0.00	13H	0.00	13I	0.00	13J	0.00
14	Debt securities, including UoP	14G	0.00	14H	0.00	14I	0.00	14J	0.00
15	Equity instruments	15G	0.00	15H	0.00			15J	0.00
16	Of which: insurance undertakings	16G	1,586,797.86	16H	110,102.66	16I	0.00	16J	110,102.66
17	Loans and advances	17G	0.00	17H	0.00	17I	0.00	17J	0.00
18	Debt securities, including UoP	18G	1,586,797.86	18H	110,102.66	18I	0.00	18J	110,102.66
19	Equity instruments	19G	0.00	19H	0.00			19J	0.00
20	Non-financial undertakings	20G	497,739.72	20H	12,562.61	20I	0.00	20J	6,512.61
21	Loans and advances	21G	285,152.16	21H	5,000.12	21I	0.00	21J	5,000.12
22	Debt securities, including UoP	22G	211,749.73	22H	7,562.49	22I	0.00	22J	1,512.50
23	Equity instruments	23G	837.82	23H	0.00			23J	0.00
24	Households	24G	0.00	24H	0.00	24I	0.00	24J	0.00
25	Of which: loans collateralised by residential immovable property	25G	0.00	25H	0.00	25I	0.00	25J	0.00
26	Of which: building renovation loans	26G	0.00	26H	0.00	26I	0.00	26J	0.00



**GAR001 - Turnover**

27	Of which: motor vehicle loans								
28	Local governments financing	28G	0.00	28H	0.00	28I	0.00	28J	0.00
29	Housing financing	29G	0.00	29H	0.00	29I	0.00	29J	0.00
30	Local governments financing	30G	0.00	30H	0.00	30I	0.00	30J	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31G	0.00	31H	0.00	31I	0.00	31J	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32G	0.00	32H	0.00	32I	0.00	32J	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48G	2,238,779.29	48H	181,756.00	48I	0.00	48J	172,104.24
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								

**GAR001 - Turnover**

53	Total assets	53G	2,238,779.29	53H	181,756.00	53I	0.00	53J	172,104.24
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55G	0.00	55H	0.00	55I	0.00	55J	0.00
55	Assets under management	56G	0.00	56H	0.00	56I	0.00	56J	0.00
56	Of which: debt securities	57G	0.00	57H	0.00	57I	0.00	57J	0.00
57	Of which: equity instruments	58G	0.00	58H	0.00	58I	0.00	58J	0.00

Disclosure reference date T									
Water and Marine Resources (WTR)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		k		l		m		n	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1K	902,509.59	1L	654,828.68	1M	0.00	1N	461.54
2	Financial undertakings	2K	0.00	2L	0.00	2M	0.00	2N	0.00
3	Credit institutions	3K	0.00	3L	0.00	3M	0.00	3N	0.00
4	Loans and advances	4K	0.00	4L	0.00	4M	0.00	4N	0.00
5	Debt securities, including UoP	5K	0.00	5L	0.00	5M	0.00	5N	0.00
6	Equity instruments	6K	0.00	6L	0.00			6N	0.00
7	Other financial corporations	7K	0.00	7L	0.00	7M	0.00	7N	0.00
8	Of which: investment firms	8K	0.00	8L	0.00	8M	0.00	8N	0.00
9	Loans and advances	9K	0.00	9L	0.00	9M	0.00	9N	0.00
10	Debt securities, including UoP	10K	0.00	10L	0.00	10M	0.00	10N	0.00
11	Equity instruments	11K	0.00	11L	0.00			11N	0.00

**GAR001 - Turnover**

12	Of which: management companies	12K	0.00	12L	0.00	12M	0.00	12N	0.00
13	Loans and advances	13K	0.00	13L	0.00	13M	0.00	13N	0.00
14	Debt securities, including UoP	14K	0.00	14L	0.00	14M	0.00	14N	0.00
15	Equity instruments	15K	0.00	15L	0.00			15N	0.00
16	Of which: insurance undertakings	16K	0.00	16L	0.00	16M	0.00	16N	0.00
17	Loans and advances	17K	0.00	17L	0.00	17M	0.00	17N	0.00
18	Debt securities, including UoP	18K	0.00	18L	0.00	18M	0.00	18N	0.00
19	Equity instruments	19K	0.00	19L	0.00			19N	0.00
20	Non-financial undertakings	20K	902,509.59	20L	654,828.68	20M	0.00	20N	461.54
21	Loans and advances	21K	93,198.71	21L	0.00	21M	0.00	21N	0.00
22	Debt securities, including UoP	22K	809,310.88	22L	654,828.68	22M	0.00	22N	461.54
23	Equity instruments	23K	0.00	23L	0.00			23N	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28K	0.00	28L	0.00	28M	0.00	28N	0.00
29	Housing financing	29K	0.00	29L	0.00	29M	0.00	29N	0.00
30	Local governments financing	30K	0.00	30L	0.00	30M	0.00	30N	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31K	0.00	31L	0.00	31M	0.00	31N	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32K	0.00	32L	0.00	32M	0.00	32N	0.00
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								

**GAR001 - Turnover**

38	Debt securities								
39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure 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	48K	902,509.59	48L	654,828.68	48M	0.00	48N	461.54
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53K	902,509.59	53L	654,828.68	53M	0.00	53N	461.54
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55K	0.00	55L	0.00	55M	0.00	55N	0.00
55	Assets under management	56K	0.00	56L	0.00	56M	0.00	56N	0.00
56	Of which: debt securities	57K	0.00	57L	0.00	57M	0.00	57N	0.00
57	Of which: equity instruments	58K	0.00	58L	0.00	58M	0.00	58N	0.00

**GAR001 - Turnover**

Disclosure reference date T									
Circular Economy (CE)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
				Of which environmentally sustainable (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
						o	p	q	r
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	10	822,192.32	1P	54,461.34	1Q	0.00	1R	42,922.92
2	Financial undertakings	20	0.00	2P	0.00	2Q	0.00	2R	0.00
3	Credit institutions	30	0.00	3P	0.00	3Q	0.00	3R	0.00
4	Loans and advances	40	0.00	4P	0.00	4Q	0.00	4R	0.00
5	Debt securities, including UoP	50	0.00	5P	0.00	5Q	0.00	5R	0.00
6	Equity instruments	60	0.00	6P	0.00			6R	0.00
7	Other financial corporations	70	0.00	7P	0.00	7Q	0.00	7R	0.00
8	Of which: investment firms	80	0.00	8P	0.00	8Q	0.00	8R	0.00
9	Loans and advances	90	0.00	9P	0.00	9Q	0.00	9R	0.00
10	Debt securities, including UoP	100	0.00	10P	0.00	10Q	0.00	10R	0.00
11	Equity instruments	110	0.00	11P	0.00			11R	0.00
12	Of which: management companies	120	0.00	12P	0.00	12Q	0.00	12R	0.00
13	Loans and advances	130	0.00	13P	0.00	13Q	0.00	13R	0.00
14	Debt securities, including UoP	140	0.00	14P	0.00	14Q	0.00	14R	0.00
15	Equity instruments	150	0.00	15P	0.00			15R	0.00
16	Of which: insurance undertakings	160	0.00	16P	0.00	16Q	0.00	16R	0.00
17	Loans and advances	170	0.00	17P	0.00	17Q	0.00	17R	0.00
18	Debt securities, including UoP	180	0.00	18P	0.00	18Q	0.00	18R	0.00
19	Equity instruments	190	0.00	19P	0.00			19R	0.00

**GAR001 - Turnover**

20	Non-financial undertakings	200	822,192.32	20P	54,461.34	20Q	0.00	20R	42,922.92
21	Loans and advances	210	30,544.75	21P	0.00	21Q	0.00	21R	0.00
22	Debt securities, including UoP	220	682,379.97	22P	54,461.34	22Q	0.00	22R	42,922.92
23	Equity instruments	230	109,267.60	23P	0.00			23R	0.00
24	Households	240	0.00	24P	0.00	24Q	0.00	24R	0.00
25	Of which: loans collateralised by residential immovable property	250	0.00	25P	0.00	25Q	0.00	25R	0.00
26	Of which: building renovation loans	260	0.00	26P	0.00	26Q	0.00	26R	0.00
27	Of which: motor vehicle loans								
28	Local governments financing	280	0.00	28P	0.00	28Q	0.00	28R	0.00
29	Housing financing	290	0.00	29P	0.00	29Q	0.00	29R	0.00
30	Local governments financing	300	0.00	30P	0.00	30Q	0.00	30R	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	310	0.00	31P	0.00	31Q	0.00	31R	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	320	0.00	32P	0.00	32Q	0.00	32R	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								

**GAR001 - Turnover**

46	Cash and cash-related assets								
47	Other categories of assets (e.g. goodwill, commodities etc.)								
48	Total GAR assets	48O	822,192.32	48P	54,461.34	48Q	0.00	48R	42,922.92
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53O	822,192.32	53P	54,461.34	53Q	0.00	53R	42,922.92
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55O	0.00	55P	0.00	55Q	0.00	55R	0.00
55	Assets under management	56O	0.00	56P	0.00	56Q	0.00	56R	0.00
56	Of which: debt securities	57O	0.00	57P	0.00	57Q	0.00	57R	0.00
57	Of which: equity instruments	58O	0.00	58P	0.00	58Q	0.00	58R	0.00

Disclosure reference date T				
Pollution Prevention and Control (PPC)				
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)		
			Of which: use of proceeds	Of which: enabling
	s	t	u	v



**GAR001 - Turnover**

	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1S	6,781.75	1T	0.00	1U	0.00	1V	0.00
2	Financial undertakings	2S	0.00	2T	0.00	2U	0.00	2V	0.00
3	Credit institutions	3S	0.00	3T	0.00	3U	0.00	3V	0.00
4	Loans and advances	4S	0.00	4T	0.00	4U	0.00	4V	0.00
5	Debt securities, including UoP	5S	0.00	5T	0.00	5U	0.00	5V	0.00
6	Equity instruments	6S	0.00	6T	0.00			6V	0.00
7	Other financial corporations	7S	0.00	7T	0.00	7U	0.00	7V	0.00
8	Of which: investment firms	8S	0.00	8T	0.00	8U	0.00	8V	0.00
9	Loans and advances	9S	0.00	9T	0.00	9U	0.00	9V	0.00
10	Debt securities, including UoP	10S	0.00	10T	0.00	10U	0.00	10V	0.00
11	Equity instruments	11S	0.00	11T	0.00			11V	0.00
12	Of which: management companies	12S	0.00	12T	0.00	12U	0.00	12V	0.00
13	Loans and advances	13S	0.00	13T	0.00	13U	0.00	13V	0.00
14	Debt securities, including UoP	14S	0.00	14T	0.00	14U	0.00	14V	0.00
15	Equity instruments	15S	0.00	15T	0.00			15V	0.00
16	Of which: insurance undertakings	16S	0.00	16T	0.00	16U	0.00	16V	0.00
17	Loans and advances	17S	0.00	17T	0.00	17U	0.00	17V	0.00
18	Debt securities, including UoP	18S	0.00	18T	0.00	18U	0.00	18V	0.00
19	Equity instruments	19S	0.00	19T	0.00			19V	0.00
20	Non-financial undertakings	20S	6,781.75	20T	0.00	20U	0.00	20V	0.00
21	Loans and advances	21S	15.00	21T	0.00	21U	0.00	21V	0.00
22	Debt securities, including UoP	22S	5,320.18	22T	0.00	22U	0.00	22V	0.00
23	Equity instruments	23S	1,446.57	23T	0.00			23V	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								

**GAR001 - Turnover**

27	Of which: motor vehicle loans								
28	Local governments financing	28S	0.00	28T	0.00	28U	0.00	28V	0.00
29	Housing financing	29S	0.00	29T	0.00	29U	0.00	29V	0.00
30	Local governments financing	30S	0.00	30T	0.00	30U	0.00	30V	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31S	0.00	31T	0.00	31U	0.00	31V	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32S	0.00	32T	0.00	32U	0.00	32V	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48S	6,781.75	48T	0.00	48U	0.00	48V	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								

**GAR001 - Turnover**

53	Total assets	53S	6,781.75	53T	0.00	53U	0.00	53V	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55S	0.00	55T	0.00	55U	0.00	55V	0.00
55	Assets under management	56S	0.00	56T	0.00	56U	0.00	56V	0.00
56	Of which: debt securities	57S	0.00	57T	0.00	57U	0.00	57V	0.00
57	Of which: equity instruments	58S	0.00	58T	0.00	58U	0.00	58V	0.00

Disclosure reference date T									
Biodiversity and ecosystems (BIO)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		w		x		z		aa	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1W	0.00	1X	0.00	1Y	0.00	1Z	0.00
2	Financial undertakings	2W	0.00	2X	0.00	2Y	0.00	2Z	0.00
3	Credit institutions	3W	0.00	3X	0.00	3Y	0.00	3Z	0.00
4	Loans and advances	4W	0.00	4X	0.00	4Y	0.00	4Z	0.00
5	Debt securities, including UoP	5W	0.00	5X	0.00	5Y	0.00	5Z	0.00

**GAR001 - Turnover**

6	Equity instruments	6W	0.00	6X	0.00			6Z	0.00
7	Other financial corporations	7W	0.00	7X	0.00	7Y	0.00	7Z	0.00
8	Of which: investment firms	8W	0.00	8X	0.00	8Y	0.00	8Z	0.00
9	Loans and advances	9W	0.00	9X	0.00	9Y	0.00	9Z	0.00
10	Debt securities, including UoP	10W	0.00	10X	0.00	10Y	0.00	10Z	0.00
11	Equity instruments	11W	0.00	11X	0.00			11Z	0.00
12	Of which: management companies	12W	0.00	12X	0.00	12Y	0.00	12Z	0.00
13	Loans and advances	13W	0.00	13X	0.00	13Y	0.00	13Z	0.00
14	Debt securities, including UoP	14W	0.00	14X	0.00	14Y	0.00	14Z	0.00
15	Equity instruments	15W	0.00	15X	0.00			15Z	0.00
16	Of which: insurance undertakings	16W	0.00	16X	0.00	16Y	0.00	16Z	0.00
17	Loans and advances	17W	0.00	17X	0.00	17Y	0.00	17Z	0.00
18	Debt securities, including UoP	18W	0.00	18X	0.00	18Y	0.00	18Z	0.00
19	Equity instruments	19W	0.00	19X	0.00			19Z	0.00
20	Non-financial undertakings	20W	0.00	20X	0.00	20Y	0.00	20Z	0.00
21	Loans and advances	21W	0.00	21X	0.00	21Y	0.00	21Z	0.00
22	Debt securities, including UoP	22W	0.00	22X	0.00	22Y	0.00	22Z	0.00
23	Equity instruments	23W	0.00	23X	0.00			23Z	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28W	0.00	28X	0.00	28Y	0.00	28Z	0.00
29	Housing financing	29W	0.00	29X	0.00	29Y	0.00	29Z	0.00
30	Local governments financing	30W	0.00	30X	0.00	30Y	0.00	30Z	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31W	0.00	31X	0.00	31Y	0.00	31Z	0.00

**GAR001 - Turnover**

32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32W	0.00	32X	0.00	32Y	0.00	32Z	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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								
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets								
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees								
55	Assets under management								
56	Of which: debt securities								

**GAR001 - Turnover**

57	Of which: equity instruments				
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Disclosure reference date T											
TOTAL (CCM + CCA + WMR + CE + PPC + BIO)											
Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
EUR m	Of which environmentally sustainable (Taxonomy-aligned)										
					Of which: use of proceeds		Of which: transitional		Of which: enabling		
	ab		ac		ad		ae		af		
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AA	4,936,831,935.79	1AB	581,618,254.89	1AC	538,062,606.12	1AD	7,167,336.39	1AE	27,245,932.21
2	Financial undertakings	2AA	52,247,459.86	2AB	5,917,246.56	2AC	0.00	2AD	1,904,846.30	2AE	258,518.91
3	Credit institutions	3AA	50,644,991.96	3AB	5,791,473.86	3AC	0.00	3AD	1,904,846.30	3AE	145,529.66
4	Loans and advances	4AA	0.00	4AB	0.00	4AC	0.00	4AD	0.00	4AE	0.00
5	Debt securities, including UoP	5AA	50,047,985.50	5AB	5,742,601.15	5AC	0.00	5AD	1,904,635.84	5AE	141,923.58
6	Equity instruments	6AA	597,006.45	6AB	48,872.72			6AD	210.46	6AE	3,606.08
7	Other financial corporations	7AA	1,602,467.90	7AB	125,772.70	7AC	0.00	7AD	0.00	7AE	112,989.24
8	Of which: investment firms	8AA	0.00	8AB	0.00	8AC	0.00	8AD	0.00	8AE	0.00

**GAR001 - Turnover**

9	Loans and advances	9AA	0.00	9AB	0.00	9AC	0.00	9AD	0.00	9AE	0.00
10	Debt securities, including UoP	10AA	0.00	10AB	0.00	10AC	0.00	10AD	0.00	10AE	0.00
11	Equity instruments	11AA	0.00	11AB	0.00			11AD	0.00	11AE	0.00
12	Of which: management companies	12AA	0.00	12AB	0.00	12AC	0.00	12AD	0.00	12AE	0.00
13	Loans and advances	13AA	0.00	13AB	0.00	13AC	0.00	13AD	0.00	13AE	0.00
14	Debt securities, including UoP	14AA	0.00	14AB	0.00	14AC	0.00	14AD	0.00	14AE	0.00
15	Equity instruments	15AA	0.00	15AB	0.00			15AD	0.00	15AE	0.00
16	Of which: insurance undertakings	16AA	1,602,467.90	16AB	125,772.70	16AC	0.00	16AD	0.00	16AE	112,989.24
17	Loans and advances	17AA	0.00	17AB	0.00	17AC	0.00	17AD	0.00	17AE	0.00
18	Debt securities, including UoP	18AA	1,602,467.90	18AB	125,772.70	18AC	0.00	18AD	0.00	18AE	112,989.24
19	Equity instruments	19AA	0.00	19AB	0.00			19AD	0.00	19AE	0.00
20	Non-financial undertakings	20AA	86,972,972.30	20AB	37,638,402.21	20AC	0.00	20AD	5,262,490.09	20AE	26,987,413.30
21	Loans and advances	21AA	58,146,533.09	21AB	27,057,299.33	21AC	0.00	21AD	3,724,542.11	21AE	21,059,327.74
22	Debt securities, including UoP	22AA	24,727,189.83	22AB	9,556,720.39	22AC	0.00	22AD	1,533,027.89	22AE	5,093,360.93
23	Equity instruments	23AA	4,099,249.38	23AB	1,024,382.48			23AD	4,920.09	23AE	834,724.63
24	Households	24AA	4,797,611,503.63	24AB	538,062,606.12	24AC	538,062,606.12	24AD	0.00	24AE	0.00
25	Of which: loans collateralised by residential immovable property	25AA	4,555,747,209.73	25AB	530,343,351.31	25AC	530,343,351.31	25AD	0.00	25AE	0.00
26	Of which: building renovation loans	26AA	196,094,395.55	26AB	7,719,254.81	26AC	7,719,254.81	26AD	0.00	26AE	0.00
27	Of which: motor vehicle loans	27AA	45,769,898.35	27AB	0.00	27AC	0.00	27AD	0.00	27AE	0.00
28	Local governments financing	28AA	0.00	28AB	0.00	28AC	0.00	28AD	0.00	28AE	0.00
29	Housing financing	29AA	0.00	29AB	0.00	29AC	0.00	29AD	0.00	29AE	0.00
30	Local governments financing	30AA	0.00	30AB	0.00	30AC	0.00	30AD	0.00	30AE	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AA	10,977,803.98	31AB	0.00	31AC	0.00	31AD	0.00	31AE	0.00
32	Assets excluded from the numerator for GAR	32AA	0.00	32AB	0.00	32AC	0.00	32AD	0.00	32AE	0.00



**GAR001 - Turnover**

	calculation (covered in the denominator)										
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	Non-EU country counterparties not subject to NFRD disclosure 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	48AA	4,947,809,739.77	48AB	581,618,254.89	48AC	538,062,606.12	48AD	7,167,336.39	48AE	27,245,932.21
49	Assets not covered for GAR calculation										
50	Central government and Supranational issuers										
51	Central banks exposure										
52	Trading book										
53	Total assets	53AA	4,947,809,739.77	53AB	581,618,254.89	53AC	538,062,606.12	53AD	7,167,336.39	53AE	27,245,932.21
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations										

**GAR001 - Turnover**

54	Financial guarantees	55AA	0.00	55AB	0.00	55AC	0.00	55AD	0.00	55AE	0.00
55	Assets under management	56AA	0.00	56AB	0.00	56AC	0.00	56AD	0.00	56AE	0.00
56	Of which: debt securities	57AA	0.00	57AB	0.00	57AC	0.00	57AD	0.00	57AE	0.00
57	Of which: equity instruments	58AA	0.00	58AB	0.00	58AC	0.00	58AD	0.00	58AE	0.00

GAR001- T-1 Capex

## GAR001 – T-1 Capex

Disclosure reference date T- 1													
EUR m		Climate Change Mitigation (CCM)											
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
		Total (gross) carrying amount						Of which environmentally sustainable (Taxonomy-aligned)					
								Of which: use of proceeds		Of which: transitional		Of which: enabling	
		ag		ah		ai		aj		ak		al	
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AF	5,053,302,257.41	1AG	4,642,539,657.53	1AH	428,567,039.27	1AI	379,462,975.79	1AJ	6,632,551.94	1AK	21,009,582.26
2	Financial undertakings	2AF	0.00	2AG	0.00	2AH	0.00	2AI	0.00	2AJ	0.00	2AK	0.00
3	Credit institutions	3AF	0.00	3AG	0.00	3AH	0.00	3AI	0.00	3AJ	0.00	3AK	0.00
4	Loans and advances	4AF	0.00	4AG	0.00	4AH	0.00	4AI	0.00	4AJ	0.00	4AK	0.00
5	Debt securities, including UoP	5AF	0.00	5AG	0.00	5AH	0.00	5AI	0.00	5AJ	0.00	5AK	0.00
6	Equity instruments	6AF	0.00	6AG	0.00	6AH	0.00			6AJ	0.00	6AK	0.00
7	Other financial corporations	7AF	0.00	7AG	0.00	7AH	0.00	7AI	0.00	7AJ	0.00	7AK	0.00
8	Of which: investment firms	8AF	0.00	8AG	0.00	8AH	0.00	8AI	0.00	8AJ	0.00	8AK	0.00
9	Loans and advances	9AF	0.00	9AG	0.00	9AH	0.00	9AI	0.00	9AJ	0.00	9AK	0.00
10	Debt securities, including UoP	10AF	0.00	10AG	0.00	10AH	0.00	10AI	0.00	10AJ	0.00	10AK	0.00
11	Equity instruments	11AF	0.00	11AG	0.00	11AH	0.00			11AJ	0.00	11AK	0.00
12	Of which: management companies	12AF	0.00	12AG	0.00	12AH	0.00	12AI	0.00	12AJ	0.00	12AK	0.00
13	Loans and advances	13AF	0.00	13AG	0.00	13AH	0.00	13AI	0.00	13AJ	0.00	13AK	0.00

**GAR001- T-1 Capex**

14	Debt securities, including UoP instruments	14AF	0.00	14AG	0.00	14AH	0.00	14AI	0.00	14AJ	0.00	14AK	0.00
15	Equity instruments	15AF	0.00	15AG	0.00	15AH	0.00			15AJ	0.00	15AK	0.00
16	Of which: insurance undertakings	16AF	0.00	16AG	0.00	16AH	0.00	16AI	0.00	16AJ	0.00	16AK	0.00
17	Loans and advances	17AF	0.00	17AG	0.00	17AH	0.00	17AI	0.00	17AJ	0.00	17AK	0.00
18	Debt securities, including UoP instruments	18AF	0.00	18AG	0.00	18AH	0.00	18AI	0.00	18AJ	0.00	18AK	0.00
19	Equity instruments	19AF	0.00	19AG	0.00	19AH	0.00			19AJ	0.00	19AK	0.00
20	Non-financial undertakings	20AF	492,556,598.22	20AG	81,793,998.34	20AH	49,104,063.48	20AI	0.00	20AJ	6,632,551.94	20AK	21,009,582.26
21	Loans and advances	21AF	387,674,540.64	21AG	33,903,318.11	21AH	28,441,544.31	21AI	0.00	21AJ	4,416,676.52	21AK	10,872,395.15
22	Debt securities, including UoP instruments	22AF	90,217,559.03	22AG	42,961,183.55	22AH	19,580,940.13	22AI	0.00	22AJ	2,139,677.33	22AK	9,733,480.13
23	Equity instruments	23AF	14,664,498.55	23AG	4,929,496.68	23AH	1,081,579.04			23AJ	76,198.09	23AK	403,706.97
24	Households	24AF	4,547,391,480.03	24AG	4,547,391,480.03	24AH	379,462,975.79	24AI	379,462,975.79	24AJ	0.00	24AK	0.00
25	Of which: loans collateralised by residential immovable property	25AF	4,316,628,375.71	25AG	4,316,628,375.71	25AH	372,949,889.63	25AI	372,949,889.63	25AJ	0.00	25AK	0.00
26	Of which: building renovation loans	26AF	186,773,037.59	26AG	186,773,037.59	26AH	6,513,086.16	26AI	6,513,086.16	26AJ	0.00	26AK	0.00
27	Of which: motor vehicle loans	27AF	43,990,066.73	27AG	43,990,066.73	27AH	0.00	27AI	0.00	27AJ	0.00	27AK	0.00
28	Local governments financing	28AF	0.00	28AG	0.00	28AH	0.00	28AI	0.00	28AJ	0.00	28AK	0.00
29	Housing financing	29AF	0.00	29AG	0.00	29AH	0.00	29AI	0.00	29AJ	0.00	29AK	0.00
30	Local governments financing	30AF	0.00	30AG	0.00	30AH	0.00	30AI	0.00	30AJ	0.00	30AK	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AF	13,354,179.16	31AG	13,354,179.16	31AH	0.00	31AI	0.00	31AJ	0.00	31AK	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AF	7,573,353,793.80	32AG	0.00	32AH	0.00	32AI	0.00	32AJ	0.00	32AK	0.00
33	Financial and Non-financial undertakings	33AF	5,640,139,407.28										
34	SMEs and NFCs (other than SMEs) not	34AF	5,400,131,982.22										

**GAR001- T-1 Capex**

	subject to NFRD disclosure obligations												
35	Loans and advances	35AF	3,915,634,737.72										
36	Of which: loans collateralised by commercial immovable property	36AF	816,155,082.45										
37	Of which: building renovation loans	37AF	17,686,232.08										
38	Debt securities	38AF	1,046,709,894.90										
39	Equity instruments	39AF	437,787,349.60										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	40AF	240.007,425.06										
41	Loans and advances	41AF	19,553,466.93										
42	Debt securities	42AF	219,504,391.15										
43	Equity instruments	43AF	949,566.98										
44	Derivatives	44AF	495,028.39										
45	On demand interbank loans	45AF	357,152,230.60										
46	Cash and cash-related assets	46AF	57,474,390.67										
47	Other categories of assets (e.g. goodwill, commodities etc.)	47AF	1,518,092,736.86										
48	Total GAR assets	48AF	12,626,656,051.21	48AG	4,642,539,657.53	48AH	428,567,039.27	48AI	379,462,975.79	48AJ	6,632,551.94	48AK	21,009,582.26
49	Assets not covered for GAR calculation	49AF	3,950,730,688.54										
50	Central government and Supranational issuers	50AF	2,743,725,061.11										
51	Central banks exposure	51AF	1,200,399,977.78										
52	Trading book	52AF	6,605,649.65										
53	Total assets	53AF	16,577,386,739.75	53AG	4,642,539,657.53	53AH	428,567,039.27	53AI	379,462,975.79	53AJ	6,632,551.94	53AK	21,009,582.26
	Off-balance sheet exposures - Undertakings not subject												

**GAR001- T-1 Capex**

	to NFRD disclosure obligations												
54	Financial guarantees	55AF	79,513,000.57	55AG	0.00	55AH	0.00	55AI	0.00	55AJ	0.00	55AK	0.00
55	Assets under management	56AF	0.00	56AG	0.00	56AH	0.00	56AI	0.00	56AJ	0.00	56AK	0.00
56	Of which: debt securities	57AF	0.00	57AG	0.00	57AH	0.00	57AI	0.00	57AJ	0.00	57AK	0.00
57	Of which: equity instruments	58AF	0.00	58AG	0.00	58AH	0.00	58AI	0.00	58AJ	0.00	58AK	0.00

Disclosure reference date T- 1									
Climate Change Adaptation (CCA)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		am	an	ao	ap				
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AL	2,379,594.52	1AM	522,100.56	1AN	0.00	1AO	806.25
2	Financial undertakings	2AL	0.00	2AM	0.00	2AN	0.00	2AO	0.00
3	Credit institutions	3AL	0.00	3AM	0.00	3AN	0.00	3AO	0.00
4	Loans and advances	4AL	0.00	4AM	0.00	4AN	0.00	4AO	0.00
5	Debt securities, including UoP	5AL	0.00	5AM	0.00	5AN	0.00	5AO	0.00
6	Equity instruments	6AL	0.00	6AM	0.00			6AO	0.00
7	Other financial corporations	7AL	0.00	7AM	0.00	7AN	0.00	7AO	0.00
8	Of which: investment firms	8AL	0.00	8AM	0.00	8AN	0.00	8AO	0.00

**GAR001- T-1 Capex**

9	Loans and advances	9AL	0.00	9AM	0.00	9AN	0.00	9AO	0.00
10	UoP Debt securities, including	10AL	0.00	10AM	0.00	10AN	0.00	10AO	0.00
11	Equity instruments	11AL	0.00	11AM	0.00			11AO	0.00
12	Of which: management companies	12AL	0.00	12AM	0.00	12AN	0.00	12AO	0.00
13	Loans and advances	13AL	0.00	13AM	0.00	13AN	0.00	13AO	0.00
14	UoP Debt securities, including	14AL	0.00	14AM	0.00	14AN	0.00	14AO	0.00
15	Equity instruments	15AL	0.00	15AM	0.00			15AO	0.00
16	Of which: insurance undertakings	16AL	0.00	16AM	0.00	16AN	0.00	16AO	0.00
17	Loans and advances	17AL	0.00	17AM	0.00	17AN	0.00	17AO	0.00
18	UoP Debt securities, including	18AL	0.00	18AM	0.00	18AN	0.00	18AO	0.00
19	Equity instruments	19AL	0.00	19AM	0.00			19AO	0.00
20	Non-financial undertakings	20AL	2,379,594.52	20AM	522,100.56	20AN	0.00	20AO	806.25
21	Loans and advances	21AL	1,406,578.69	21AM	45,074.60	21AN	0.00	21AO	0.00
22	UoP Debt securities, including	22AL	973,015.82	22AM	477,025.96	22AN	0.00	22AO	806.25
23	Equity instruments	23AL	0.00	23AM	0.00			23AO	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28AL	0.00	28AM	0.00	28AN	0.00	28AO	0.00
29	Housing financing	29AL	0.00	29AM	0.00	29AN	0.00	29AO	0.00
30	Local governments financing	30AL	0.00	30AM	0.00	30AN	0.00	30AO	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AL	0.00	31AM	0.00	31AN	0.00	31AO	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AL	0.00	32AM	0.00	32AN	0.00	32AO	0.00
33	Financial and Non-financial undertakings								



**GAR001- T-1 Capex**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48AL	2,379,594.52	48AM	522,100.56	48AN	0.00	48AO	806.25
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53AL	2,379,594.52	53AM	522,100.56	53AN	0.00	53AO	806.25
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AL	0.00	55AM	0.00	55AN	0.00	55AO	0.00
55	Assets under management	56AL	0.00	56AM	0.00	56AN	0.00	56AO	0.00
56	Of which: debt securities	57AL	0.00	57AM	0.00	57AN	0.00	57AO	0.00
57	Of which: equity instruments	58AL	0.00	58AM	0.00	58AN	0.00	58AO	0.00

**GAR001- T-1 Capex**

Disclosure reference date T- 1									
Water and Marine Resources (WTR)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		aq		ar		as		at	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AP	0.00	1AQ	0.00	1AR	0.00	1AS	0.00
2	Financial undertakings	2AP	0.00	2AQ	0.00	2AR	0.00	2AS	0.00
3	Credit institutions	3AP	0.00	3AQ	0.00	3AR	0.00	3AS	0.00
4	Loans and advances	4AP	0.00	4AQ	0.00	4AR	0.00	4AS	0.00
5	UoP Debt securities, including	5AP	0.00	5AQ	0.00	5AR	0.00	5AS	0.00
6	Equity instruments	6AP	0.00	6AQ	0.00			6AS	0.00
7	Other financial corporations	7AP	0.00	7AQ	0.00	7AR	0.00	7AS	0.00
8	Of which: investment firms	8AP	0.00	8AQ	0.00	8AR	0.00	8AS	0.00
9	Loans and advances	9AP	0.00	9AQ	0.00	9AR	0.00	9AS	0.00
10	UoP Debt securities, including	10AP	0.00	10AQ	0.00	10AR	0.00	10AS	0.00
11	Equity instruments	11AP	0.00	11AQ	0.00			11AS	0.00
12	Of which: management companies	12AP	0.00	12AQ	0.00	12AR	0.00	12AS	0.00
13	Loans and advances	13AP	0.00	13AQ	0.00	13AR	0.00	13AS	0.00
14	UoP Debt securities, including	14AP	0.00	14AQ	0.00	14AR	0.00	14AS	0.00
15	Equity instruments	15AP	0.00	15AQ	0.00			15AS	0.00

**GAR001- T-1 Capex**

16	Of which: insurance undertakings	16AP	0.00	16AQ	0.00	16AR	0.00	16AS	0.00
17	Loans and advances	17AP	0.00	17AQ	0.00	17AR	0.00	17AS	0.00
18	UoP Debt securities, including	18AP	0.00	18AQ	0.00	18AR	0.00	18AS	0.00
19	Equity instruments	19AP	0.00	19AQ	0.00			19AS	0.00
20	Non-financial undertakings	20AP	0.00	20AQ	0.00	20AR	0.00	20AS	0.00
21	Loans and advances	21AP	0.00	21AQ	0.00	21AR	0.00	21AS	0.00
22	UoP Debt securities, including	22AP	0.00	22AQ	0.00	22AR	0.00	22AS	0.00
23	Equity instruments	23AP	0.00	23AQ	0.00			23AS	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28AP	0.00	28AQ	0.00	28AR	0.00	28AS	0.00
29	Housing financing	29AP	0.00	29AQ	0.00	29AR	0.00	29AS	0.00
30	Local governments financing	30AP	0.00	30AQ	0.00	30AR	0.00	30AS	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AP	0.00	31AQ	0.00	31AR	0.00	31AS	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AP	0.00	32AQ	0.00	32AR	0.00	32AS	0.00
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								

**GAR001- T-1 Capex**

40	Non-EU country counterparties not subject to NFRD disclosure 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	48AP	0.00	48AQ	0.00	48AR	0.00	48AS	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53AP	0.00	53AQ	0.00	53AR	0.00	53AS	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AP	0.00	55AQ	0.00	55AR	0.00	55AS	0.00
55	Assets under management	56AP	0.00	56AQ	0.00	56AR	0.00	56AS	0.00
56	Of which: debt securities	57AP	0.00	57AQ	0.00	57AR	0.00	57AS	0.00
57	Of which: equity instruments	58AP	0.00	58AQ	0.00	58AR	0.00	58AS	0.00

Disclosure reference date T- 1

Circular Economy (CE)

EUR m

Of which towards taxonomy relevant sectors (Taxonomy-eligible)

**GAR001- T-1 Capex**

				Of which environmentally sustainable (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
						aw		ax	
		au		av		aw		ax	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AT	0.00	1AU	0.00	1AV	0.00	1AW	0.00
2	Financial undertakings	2AT	0.00	2AU	0.00	2AV	0.00	2AW	0.00
3	Credit institutions	3AT	0.00	3AU	0.00	3AV	0.00	3AW	0.00
4	Loans and advances	4AT	0.00	4AU	0.00	4AV	0.00	4AW	0.00
5	Debt securities, including	5AT	0.00	5AU	0.00	5AV	0.00	5AW	0.00
6	UoP Equity instruments	6AT	0.00	6AU	0.00			6AW	0.00
7	Other financial corporations	7AT	0.00	7AU	0.00	7AV	0.00	7AW	0.00
8	Of which: investment firms	8AT	0.00	8AU	0.00	8AV	0.00	8AW	0.00
9	Loans and advances	9AT	0.00	9AU	0.00	9AV	0.00	9AW	0.00
10	Debt securities, including	10AT	0.00	10AU	0.00	10AV	0.00	10AW	0.00
11	UoP Equity instruments	11AT	0.00	11AU	0.00			11AW	0.00
12	Of which: management companies	12AT	0.00	12AU	0.00	12AV	0.00	12AW	0.00
13	Loans and advances	13AT	0.00	13AU	0.00	13AV	0.00	13AW	0.00
14	Debt securities, including	14AT	0.00	14AU	0.00	14AV	0.00	14AW	0.00
15	UoP Equity instruments	15AT	0.00	15AU	0.00			15AW	0.00
16	Of which: insurance undertakings	16AT	0.00	16AU	0.00	16AV	0.00	16AW	0.00
17	Loans and advances	17AT	0.00	17AU	0.00	17AV	0.00	17AW	0.00
18	Debt securities, including	18AT	0.00	18AU	0.00	18AV	0.00	18AW	0.00
19	UoP Equity instruments	19AT	0.00	19AU	0.00			19AW	0.00
20	Non-financial undertakings	20AT	0.00	20AU	0.00	20AV	0.00	20AW	0.00
21	Loans and advances	21AT	0.00	21AU	0.00	21AV	0.00	21AW	0.00

**GAR001- T-1 Capex**

22	UoP Debt securities, including	22AT	0.00	22AU	0.00	22AV	0.00	22AW	0.00
23	Equity instruments	23AT	0.00	23AU	0.00			23AW	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28AT	0.00	28AU	0.00	28AV	0.00	28AW	0.00
29	Housing financing	29AT	0.00	29AU	0.00	29AV	0.00	29AW	0.00
30	Local governments financing	30AT	0.00	30AU	0.00	30AV	0.00	30AW	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AT	0.00	31AU	0.00	31AV	0.00	31AW	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AT	0.00	32AU	0.00	32AV	0.00	32AW	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								
46	Cash and cash-related assets								

**GAR001- T-1 Capex**

47	Other categories of assets (e.g. goodwill, commodities etc.)								
48	Total GAR assets	48AT	0.00	48AU	0.00	48AV	0.00	48AW	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53AT	0.00	53AU	0.00	53AV	0.00	53AW	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AT	0.00	55AU	0.00	55AV	0.00	55AW	0.00
55	Assets under management	56AT	0.00	56AU	0.00	56AV	0.00	56AW	0.00
56	Of which: debt securities	57AT	0.00	57AU	0.00	57AV	0.00	57AW	0.00
57	Of which: equity instruments	58AT	0.00	58AU	0.00	58AV	0.00	58AW	0.00

Disclosure reference date T- 1									
Pollution Prevention and Control (PPC)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		ay		az		ba		bb	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AX	0.00	1AY	0.00	1AZ	0.00	1BA	0.00



## GAR001- T-1 Capex

2	Financial undertakings	2AX	0.00	2AY	0.00	2AZ	0.00	2BA	0.00
3	Credit institutions	3AX	0.00	3AY	0.00	3AZ	0.00	3BA	0.00
4	Loans and advances	4AX	0.00	4AY	0.00	4AZ	0.00	4BA	0.00
5	UoP Debt securities, including	5AX	0.00	5AY	0.00	5AZ	0.00	5BA	0.00
6	Equity instruments	6AX	0.00	6AY	0.00			6BA	0.00
7	Other financial corporations	7AX	0.00	7AY	0.00	7AZ	0.00	7BA	0.00
8	Of which: investment firms	8AX	0.00	8AY	0.00	8AZ	0.00	8BA	0.00
9	Loans and advances	9AX	0.00	9AY	0.00	9AZ	0.00	9BA	0.00
10	UoP Debt securities, including	10AX	0.00	10AY	0.00	10AZ	0.00	10BA	0.00
11	Equity instruments	11AX	0.00	11AY	0.00			11BA	0.00
12	Of which: management companies	12AX	0.00	12AY	0.00	12AZ	0.00	12BA	0.00
13	Loans and advances	13AX	0.00	13AY	0.00	13AZ	0.00	13BA	0.00
14	UoP Debt securities, including	14AX	0.00	14AY	0.00	14AZ	0.00	14BA	0.00
15	Equity instruments	15AX	0.00	15AY	0.00			15BA	0.00
16	Of which: insurance undertakings	16AX	0.00	16AY	0.00	16AZ	0.00	16BA	0.00
17	Loans and advances	17AX	0.00	17AY	0.00	17AZ	0.00	17BA	0.00
18	UoP Debt securities, including	18AX	0.00	18AY	0.00	18AZ	0.00	18BA	0.00
19	Equity instruments	19AX	0.00	19AY	0.00			19BA	0.00
20	Non-financial undertakings	20AX	0.00	20AY	0.00	20AZ	0.00	20BA	0.00
21	Loans and advances	21AX	0.00	21AY	0.00	21AZ	0.00	21BA	0.00
22	UoP Debt securities, including	22AX	0.00	22AY	0.00	22AZ	0.00	22BA	0.00
23	Equity instruments	23AX	0.00	23AY	0.00			23BA	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	loans Of which: building renovation								
27	Of which: motor vehicle loans								

**GAR001- T-1 Capex**

28	Local governments financing	28AX	0.00	28AY	0.00	28AZ	0.00	28BA	0.00
29	Housing financing	29AX	0.00	29AY	0.00	29AZ	0.00	29BA	0.00
30	Local governments financing	30AX	0.00	30AY	0.00	30AZ	0.00	30BA	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AX	0.00	31AY	0.00	31AZ	0.00	31BA	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AX	0.00	32AY	0.00	32AZ	0.00	32BA	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48AX	0.00	48AY	0.00	48AZ	0.00	48BA	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								

**GAR001- T-1 Capex**

53	Total assets	53AX	0.00	53AY	0.00	53AZ	0.00	53BA	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AX	0.00	55AY	0.00	55AZ	0.00	55BA	0.00
55	Assets under management	56AX	0.00	56AY	0.00	56AZ	0.00	56BA	0.00
56	Of which: debt securities	57AX	0.00	57AY	0.00	57AZ	0.00	57BA	0.00
57	Of which: equity instruments	58AX	0.00	58AY	0.00	58AZ	0.00	58BA	0.00

Disclosure reference date T- 1									
Biodiversity and ecosystems (BIO)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		bc		bd		be		bf	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1BB	0.00	1BC	0.00	1BD	0.00	1BE	0.00
2	Financial undertakings	2BB	0.00	2BC	0.00	2BD	0.00	2BE	0.00
3	Credit institutions	3BB	0.00	3BC	0.00	3BD	0.00	3BE	0.00
4	Loans and advances	4BB	0.00	4BC	0.00	4BD	0.00	4BE	0.00
5	Debt securities, including UoP	5BB	0.00	5BC	0.00	5BD	0.00	5BE	0.00
6	Equity instruments	6BB	0.00	6BC	0.00			6BE	0.00
7	Other financial corporations	7BB	0.00	7BC	0.00	7BD	0.00	7BE	0.00

## GAR001- T-1 Capex

8	Of which: investment firms	8BB	0.00	8BC	0.00	8BD	0.00	8BE	0.00
9	Loans and advances	9BB	0.00	9BC	0.00	9BD	0.00	9BE	0.00
10	UoP Debt securities, including	10BB	0.00	10BC	0.00	10BD	0.00	10BE	0.00
11	Equity instruments	11BB	0.00	11BC	0.00			11BE	0.00
12	Of which: management companies	12BB	0.00	12BC	0.00	12BD	0.00	12BE	0.00
13	Loans and advances	13BB	0.00	13BC	0.00	13BD	0.00	13BE	0.00
14	UoP Debt securities, including	14BB	0.00	14BC	0.00	14BD	0.00	14BE	0.00
15	Equity instruments	15BB	0.00	15BC	0.00			15BE	0.00
16	Of which: insurance undertakings	16BB	0.00	16BC	0.00	16BD	0.00	16BE	0.00
17	Loans and advances	17BB	0.00	17BC	0.00	17BD	0.00	17BE	0.00
18	UoP Debt securities, including	18BB	0.00	18BC	0.00	18BD	0.00	18BE	0.00
19	Equity instruments	19BB	0.00	19BC	0.00			19BE	0.00
20	Non-financial undertakings	20BB	0.00	20BC	0.00	20BD	0.00	20BE	0.00
21	Loans and advances	21BB	0.00	21BC	0.00	21BD	0.00	21BE	0.00
22	UoP Debt securities, including	22BB	0.00	22BC	0.00	22BD	0.00	22BE	0.00
23	Equity instruments	23BB	0.00	23BC	0.00			23BE	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28BB	0.00	28BC	0.00	28BD	0.00	28BE	0.00
29	Housing financing	29BB	0.00	29BC	0.00	29BD	0.00	29BE	0.00
30	Local governments financing	30BB	0.00	30BC	0.00	30BD	0.00	30BE	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31BB	0.00	31BC	0.00	31BD	0.00	31BE	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32BB	0.00	32BC	0.00	32BD	0.00	32BE	0.00

**GAR001- T-1 Capex**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48BB	0.00	48BC	0.00	48BD	0.00	48BE	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53BB	0.00	53BC	0.00	53BD	0.00	53BE	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55BB	0.00	55BC	0.00	55BD	0.00	55BE	0.00
55	Assets under management	56BB	0.00	56BC	0.00	56BD	0.00	56BE	0.00
56	Of which: debt securities	57BB	0.00	57BC	0.00	57BD	0.00	57BE	0.00

**GAR001- T-1 Capex**

57	Of which: equity instruments	58BB	0.00	58BC	0.00	58BD	0.00	58BE	0.00
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Disclosure reference date T- 1											
TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
EUR m	Of which environmentally sustainable (Taxonomy-aligned)										
					Of which: use of proceeds		Of which: transitional		Of which: enabling		
	bg		bh		bi		bj		bk		
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1BF	4,644,919,252.05	1BG	429,089,139.83	1BH	379,462,975.79	1BI	6,632,551.94	1BJ	21,010,388.51
2	Financial undertakings	2BF	0.00	2BG	0.00	2BH	0.00	2BI	0.00	2BJ	0.00
3	Credit institutions	3BF	0.00	3BG	0.00	3BH	0.00	3BI	0.00	3BJ	0.00
4	Loans and advances	4BF	0.00	4BG	0.00	4BH	0.00	4BI	0.00	4BJ	0.00
5	Debt securities, including UoP	5BF	0.00	5BG	0.00	5BH	0.00	5BI	0.00	5BJ	0.00
6	Equity instruments	6BF	0.00	6BG	0.00			6BI	0.00	6BJ	0.00
7	Other financial corporations	7BF	0.00	7BG	0.00	7BH	0.00	7BI	0.00	7BJ	0.00
8	Of which: investment firms	8BF	0.00	8BG	0.00	8BH	0.00	8BI	0.00	8BJ	0.00
9	Loans and advances	9BF	0.00	9BG	0.00	9BH	0.00	9BI	0.00	9BJ	0.00
10	Debt securities, including UoP	10BF	0.00	10BG	0.00	10BH	0.00	10BI	0.00	10BJ	0.00
11	Equity instruments	11BF	0.00	11BG	0.00			11BI	0.00	11BJ	0.00

**GAR001- T-1 Capex**

12	Of which: management companies	12BF	0.00	12BG	0.00	12BH	0.00	12BI	0.00	12BJ	0.00
13	Loans and advances	13BF	0.00	13BG	0.00	13BH	0.00	13BI	0.00	13BJ	0.00
14	Debt securities, including UoP	14BF	0.00	14BG	0.00	14BH	0.00	14BI	0.00	14BJ	0.00
15	Equity instruments	15BF	0.00	15BG	0.00			15BI	0.00	15BJ	0.00
16	Of which: insurance undertakings	16BF	0.00	16BG	0.00	16BH	0.00	16BI	0.00	16BJ	0.00
17	Loans and advances	17BF	0.00	17BG	0.00	17BH	0.00	17BI	0.00	17BJ	0.00
18	Debt securities, including UoP	18BF	0.00	18BG	0.00	18BH	0.00	18BI	0.00	18BJ	0.00
19	Equity instruments	19BF	0.00	19BG	0.00			19BI	0.00	19BJ	0.00
20	Non-financial undertakings	20BF	84,173,592.86	20BG	49,626,164.04	20BH	0.00	20BI	6,632,551.94	20BJ	21,010,388.51
21	Loans and advances	21BF	35,309,896.81	21BG	28,486,618.91	21BH	0.00	21BI	4,416,676.52	21BJ	10,872,395.15
22	Debt securities, including UoP	22BF	43,934,199.38	22BG	20,057,966.09	22BH	0.00	22BI	2,139,677.33	22BJ	9,734,286.38
23	Equity instruments	23BF	4,929,496.68	23BG	1,081,579.04			23BI	76,198.09	23BJ	403,706.97
24	Households	24BF	4,547,391,480.03	24BG	379,462,975.79	24BH	379,462,975.79	24BI	0.00	24BJ	0.00
25	Of which: loans collateralised by residential immovable property	25BF	4,316,628,375.71	25BG	372,949,889.63	25BH	372,949,889.63	25BI	0.00	25BJ	0.00
26	Of which: building renovation loans	26BF	186,773,037.59	26BG	6,513,086.16	26BH	6,513,086.16	26BI	0.00	26BJ	0.00
27	Of which: motor vehicle loans	27BF	43,990,066.73	27BG	0.00	27BH	0.00	27BI	0.00	27BJ	0.00
28	Local governments financing	28BF	0.00	28BG	0.00	28BH	0.00	28BI	0.00	28BJ	0.00
29	Housing financing	29BF	0.00	29BG	0.00	29BH	0.00	29BI	0.00	29BJ	0.00
30	Local governments financing	30BF	0.00	30BG	0.00	30BH	0.00	30BI	0.00	30BJ	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31BF	13,354,179.16	31BG	0.00	31BH	0.00	31BI	0.00	31BJ	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32BF	0.00	32BG	0.00	32BH	0.00	32BI	0.00	32BJ	0.00
33	Financial and Non- financial undertakings										



**GAR001- T-1 Capex**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48BF	4,644,919,252.05	48BG	429,089,139.83	48BH	379,462,975.79	48BI	6,632,551.94	48BJ	21,010,388.51
49	Assets not covered for GAR calculation										
50	Central government and Supranational issuers										
51	Central banks exposure										
52	Trading book										
53	Total assets	53BF	4,644,919,252.05	53BG	429,089,139.83	53BH	379,462,975.79	53BI	6,632,551.94	53BJ	21,010,388.51
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations										
54	Financial guarantees	55BF	0.00	55BG	0.00	55BH	0.00	55BI	0.00	55BJ	0.00
55	Assets under management	56BF	0.00	56BG	0.00	56BH	0.00	56BI	0.00	56BJ	0.00

**GAR001- T-1 Capex**

56	Of which: debt securities	57BF	0.00	57BG	0.00	57BH	0.00	57BI	0.00	57BJ	0.00
57	Of which: equity instruments	58BF	0.00	58BG	0.00	58BH	0.00	58BI	0.00	58BJ	0.00

**GAR001 – T-1 Turnover**

Disclosure reference date T- 1						
EUR m	Climate Change Mitigation (CCM)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Total (gross) carrying amount	Of which environmentally sustainable (Taxonomy-aligned)				
		Of which: use of proceeds			Of which: transitional	Of which: enabling
	ag	ah	ai	aj	ak	al

**GAR001- T-1 Capex**

	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AF	5,053,302,257.41	1AG	4,616,600,090.50	1AH	401,862,980.21	1AI	379,462,975.79	1AJ	7,528,198.10	1AK	8,532,666.97
2	Financial undertakings	2AF	0.00	2AG	0.00	2AH	0.00	2AI	0.00	2AJ	0.00	2AK	0.00
3	Credit institutions	3AF	0.00	3AG	0.00	3AH	0.00	3AI	0.00	3AJ	0.00	3AK	0.00
4	Loans and advances	4AF	0.00	4AG	0.00	4AH	0.00	4AI	0.00	4AJ	0.00	4AK	0.00
5	Debt securities, including UoP	5AF	0.00	5AG	0.00	5AH	0.00	5AI	0.00	5AJ	0.00	5AK	0.00
6	Equity instruments	6AF	0.00	6AG	0.00	6AH	0.00			6AJ	0.00	6AK	0.00
7	Other financial corporations	7AF	0.00	7AG	0.00	7AH	0.00	7AI	0.00	7AJ	0.00	7AK	0.00
8	Of which: investment firms	8AF	0.00	8AG	0.00	8AH	0.00	8AI	0.00	8AJ	0.00	8AK	0.00
9	Loans and advances	9AF	0.00	9AG	0.00	9AH	0.00	9AI	0.00	9AJ	0.00	9AK	0.00
10	Debt securities, including UoP	10AF	0.00	10AG	0.00	10AH	0.00	10AI	0.00	10AJ	0.00	10AK	0.00
11	Equity instruments	11AF	0.00	11AG	0.00	11AH	0.00			11AJ	0.00	11AK	0.00
12	Of which: management companies	12AF	0.00	12AG	0.00	12AH	0.00	12AI	0.00	12AJ	0.00	12AK	0.00
13	Loans and advances	13AF	0.00	13AG	0.00	13AH	0.00	13AI	0.00	13AJ	0.00	13AK	0.00
14	Debt securities, including UoP	14AF	0.00	14AG	0.00	14AH	0.00	14AI	0.00	14AJ	0.00	14AK	0.00
15	Equity instruments	15AF	0.00	15AG	0.00	15AH	0.00			15AJ	0.00	15AK	0.00
16	Of which: insurance undertakings	16AF	0.00	16AG	0.00	16AH	0.00	16AI	0.00	16AJ	0.00	16AK	0.00
17	Loans and advances	17AF	0.00	17AG	0.00	17AH	0.00	17AI	0.00	17AJ	0.00	17AK	0.00
18	Debt securities, including UoP	18AF	0.00	18AG	0.00	18AH	0.00	18AI	0.00	18AJ	0.00	18AK	0.00
19	Equity instruments	19AF	0.00	19AG	0.00	19AH	0.00			19AJ	0.00	19AK	0.00
20	Non-financial undertakings	20AF	492,556,598.22	20AG	55,854,431.31	20AH	22,400,004.42	20AI	0.00	20AJ	7,528,198.10	20AK	8,532,666.97
21	Loans and advances	21AF	387,674,540.64	21AG	25,387,993.61	21AH	11,770,925.32	21AI	0.00	21AJ	6,297,277.06	21AK	2,613,053.71

**GAR001- T-1 Capex**

22	Debt securities, including UoP	22AF	90,217,559.03	22AG	28,383,896.74	22AH	10,339,302.68	22AI	0.00	22AJ	1,229,116.62	22AK	5,785,280.59
23	Equity instruments	23AF	14,664,498.55	23AG	2,082,540.95	23AH	289,776.42			23AJ	1,804.41	23AK	134,332.66
24	Households	24AF	4,547,391,480.03	24AG	4,547,391,480.03	24AH	379,462,975.79	24AI	379,462,975.79	24AJ	0.00	24AK	0.00
25	Of which: loans collateralised by residential immovable property	25AF	4,316,628,375.71	25AG	4,316,628,375.71	25AH	372,949,889.63	25AI	372,949,889.63	25AJ	0.00	25AK	0.00
26	Of which: building renovation loans	26AF	186,773,037.59	26AG	186,773,037.59	26AH	6,513,086.16	26AI	6,513,086.16	26AJ	0.00	26AK	0.00
27	Of which: motor vehicle loans	27AF	43,990,066.73	27AG	43,990,066.73	27AH	0.00	27AI	0.00	27AJ	0.00	27AK	0.00
28	Local governments financing	28AF	0.00	28AG	0.00	28AH	0.00	28AI	0.00	28AJ	0.00	28AK	0.00
29	Housing financing	29AF	0.00	29AG	0.00	29AH	0.00	29AI	0.00	29AJ	0.00	29AK	0.00
30	Local governments financing	30AF	0.00	30AG	0.00	30AH	0.00	30AI	0.00	30AJ	0.00	30AK	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AF	13,354,179.16	31AG	13,354,179.16	31AH	0.00	31AI	0.00	31AJ	0.00	31AK	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AF	7,573,353,793.80	32AG	0.00	32AH	0.00	32AI	0.00	32AJ	0.00	32AK	0.00
33	Financial and Non-financial undertakings	33AF	5,640,139,407.28										
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34AF	5,400,131,982.22										
35	Loans and advances	35AF	3,915,634,737.72										
36	Of which: loans collateralised by commercial immovable property	36AF	816,155,082.45										
37	Of which: building renovation loans	37AF	17,686,232.08										
38	Debt securities	38AF	1,046,709,894.90										
39	Equity instruments	39AF	437,787,349.60										
40	Non-EU country counterparties not	40AF	240,007,425.06										

**GAR001- T-1 Capex**

	subject to NFRD disclosure obligations												
41	Loans and advances	41AF	19,553,466.93										
42	Debt securities	42AF	219,504,391.15										
43	Equity instruments	43AF	949,566.98										
44	Derivatives	44AF	495,028.39										
45	On demand interbank loans	45AF	357,152,230.60										
46	Cash and cash-related assets	46AF	57,474,390.67										
47	Other categories of assets (e.g. goodwill, commodities etc.)	47AF	1,518,092,736.86										
48	Total GAR assets	48AF	12,626,656,051.21	48AG	4,616,600,090.50	48AH	401,862,980.21	48AI	379,462,975.79	48AJ	7,528,198.10	48AK	8,532,666.97
49	Assets not covered for GAR calculation	49AF	3,950,730,688.54										
50	Central government and Supranational issuers	50AF	2,743,725,061.11										
51	Central banks exposure	51AF	1,200,399,977.78										
52	Trading book	52AF	6,605,649.65										
53	Total assets	53AF	16,577,386,739.75	53AG	4,616,600,090.50	53AH	401,862,980.21	53AI	379,462,975.79	53AJ	7,528,198.10	53AK	8,532,666.97
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations												
54	Financial guarantees	55AF	79,513,000.57	55AG	0.00	55AH	0.00	55AI	0.00	55AJ	0.00	55AK	0.00
55	Assets under management	56AF	0.00	56AG	0.00	56AH	0.00	56AI	0.00	56AJ	0.00	56AK	0.00
56	Of which: debt securities	57AF	0.00	57AG	0.00	57AH	0.00	57AI	0.00	57AJ	0.00	57AK	0.00
57	Of which: equity instruments	58AF	0.00	58AG	0.00	58AH	0.00	58AI	0.00	58AJ	0.00	58AK	0.00

Disclosure reference date T- 1

**GAR001- T-1 Capex**

Climate Change Adaptation (CCA)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		am		an		ao		ap	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AL	1,298,165.09	1AM	299,868.18	1AN	0.00	1AO	0.00
2	Financial undertakings	2AL	0.00	2AM	0.00	2AN	0.00	2AO	0.00
3	Credit institutions	3AL	0.00	3AM	0.00	3AN	0.00	3AO	0.00
4	Loans and advances	4AL	0.00	4AM	0.00	4AN	0.00	4AO	0.00
5	UoP Debt securities, including	5AL	0.00	5AM	0.00	5AN	0.00	5AO	0.00
6	Equity instruments	6AL	0.00	6AM	0.00			6AO	0.00
7	Other financial corporations	7AL	0.00	7AM	0.00	7AN	0.00	7AO	0.00
8	Of which: investment firms	8AL	0.00	8AM	0.00	8AN	0.00	8AO	0.00
9	Loans and advances	9AL	0.00	9AM	0.00	9AN	0.00	9AO	0.00
10	UoP Debt securities, including	10AL	0.00	10AM	0.00	10AN	0.00	10AO	0.00
11	Equity instruments	11AL	0.00	11AM	0.00			11AO	0.00
12	Of which: management companies	12AL	0.00	12AM	0.00	12AN	0.00	12AO	0.00
13	Loans and advances	13AL	0.00	13AM	0.00	13AN	0.00	13AO	0.00
14	UoP Debt securities, including	14AL	0.00	14AM	0.00	14AN	0.00	14AO	0.00
15	Equity instruments	15AL	0.00	15AM	0.00			15AO	0.00
16	Of which: insurance undertakings	16AL	0.00	16AM	0.00	16AN	0.00	16AO	0.00
17	Loans and advances	17AL	0.00	17AM	0.00	17AN	0.00	17AO	0.00
18	UoP Debt securities, including	18AL	0.00	18AM	0.00	18AN	0.00	18AO	0.00
19	Equity instruments	19AL	0.00	19AM	0.00			19AO	0.00

**GAR001- T-1 Capex**

20	Non-financial undertakings	20AL	1,298,165.09	20AM	299,868.18	20AN	0.00	20AO	0.00
21	Loans and advances	21AL	840,927.50	21AM	78,106.33	21AN	0.00	21AO	0.00
22	Debt securities, including	22AL	456,479.40	22AM	221,761.85	22AN	0.00	22AO	0.00
23	Equity instruments	23AL	758.18	23AM	0.00			23AO	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28AL	0.00	28AM	0.00	28AN	0.00	28AO	0.00
29	Housing financing	29AL	0.00	29AM	0.00	29AN	0.00	29AO	0.00
30	Local governments financing	30AL	0.00	30AM	0.00	30AN	0.00	30AO	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AL	0.00	31AM	0.00	31AN	0.00	31AO	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AL	0.00	32AM	0.00	32AN	0.00	32AO	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								



**GAR001- T-1 Capex**

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	48AL	1,298,165.09	48AM	299,868.18	48AN	0.00	48AO	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53AL	1,298,165.09	53AM	299,868.18	53AN	0.00	53AO	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AL	0.00	55AM	0.00	55AN	0.00	55AO	0.00
55	Assets under management	56AL	0.00	56AM	0.00	56AN	0.00	56AO	0.00
56	Of which: debt securities	57AL	0.00	57AM	0.00	57AN	0.00	57AO	0.00
57	Of which: equity instruments	58AL	0.00	58AM	0.00	58AN	0.00	58AO	0.00

Disclosure reference date T- 1									
Water and Marine Resources (WTR)									
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
		Of which environmentally sustainable (Taxonomy-aligned)							
		Of which: use of proceeds				Of which: enabling			
		aq	ar	as	at				
	GAR - Assets included in both numerator and denominator								

**GAR001- T-1 Capex**

1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AP	0.00	1AQ	0.00	1AR	0.00	1AS	0.00
2	Financial undertakings	2AP	0.00	2AQ	0.00	2AR	0.00	2AS	0.00
3	Credit institutions	3AP	0.00	3AQ	0.00	3AR	0.00	3AS	0.00
4	Loans and advances	4AP	0.00	4AQ	0.00	4AR	0.00	4AS	0.00
5	Debt securities, including	5AP	0.00	5AQ	0.00	5AR	0.00	5AS	0.00
6	UoP Equity instruments	6AP	0.00	6AQ	0.00			6AS	0.00
7	Other financial corporations	7AP	0.00	7AQ	0.00	7AR	0.00	7AS	0.00
8	Of which: investment firms	8AP	0.00	8AQ	0.00	8AR	0.00	8AS	0.00
9	Loans and advances	9AP	0.00	9AQ	0.00	9AR	0.00	9AS	0.00
10	Debt securities, including	10AP	0.00	10AQ	0.00	10AR	0.00	10AS	0.00
11	UoP Equity instruments	11AP	0.00	11AQ	0.00			11AS	0.00
12	Of which: management companies	12AP	0.00	12AQ	0.00	12AR	0.00	12AS	0.00
13	Loans and advances	13AP	0.00	13AQ	0.00	13AR	0.00	13AS	0.00
14	Debt securities, including	14AP	0.00	14AQ	0.00	14AR	0.00	14AS	0.00
15	UoP Equity instruments	15AP	0.00	15AQ	0.00			15AS	0.00
16	Of which: insurance undertakings	16AP	0.00	16AQ	0.00	16AR	0.00	16AS	0.00
17	Loans and advances	17AP	0.00	17AQ	0.00	17AR	0.00	17AS	0.00
18	Debt securities, including	18AP	0.00	18AQ	0.00	18AR	0.00	18AS	0.00
19	UoP Equity instruments	19AP	0.00	19AQ	0.00			19AS	0.00
20	Non-financial undertakings	20AP	0.00	20AQ	0.00	20AR	0.00	20AS	0.00
21	Loans and advances	21AP	0.00	21AQ	0.00	21AR	0.00	21AS	0.00
22	Debt securities, including	22AP	0.00	22AQ	0.00	22AR	0.00	22AS	0.00
23	UoP Equity instruments	23AP	0.00	23AQ	0.00			23AS	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								

**GAR001- T-1 Capex**

27	Of which: motor vehicle loans								
28	Local governments financing	28AP	0.00	28AQ	0.00	28AR	0.00	28AS	0.00
29	Housing financing	29AP	0.00	29AQ	0.00	29AR	0.00	29AS	0.00
30	Local governments financing	30AP	0.00	30AQ	0.00	30AR	0.00	30AS	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AP	0.00	31AQ	0.00	31AR	0.00	31AS	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AP	0.00	32AQ	0.00	32AR	0.00	32AS	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48AP	0.00	48AQ	0.00	48AR	0.00	48AS	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								

**GAR001- T-1 Capex**

52	Trading book								
53	Total assets	53AP	0.00	53AQ	0.00	53AR	0.00	53AS	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AP	0.00	55AQ	0.00	55AR	0.00	55AS	0.00
55	Assets under management	56AP	0.00	56AQ	0.00	56AR	0.00	56AS	0.00
56	Of which: debt securities	57AP	0.00	57AQ	0.00	57AR	0.00	57AS	0.00
57	Of which: equity instruments	58AP	0.00	58AQ	0.00	58AR	0.00	58AS	0.00

Disclosure reference date T- 1									
Circular Economy (CE)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		au		av		aw		ax	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AT	0.00	1AU	0.00	1AV	0.00	1AW	0.00
2	Financial undertakings	2AT	0.00	2AU	0.00	2AV	0.00	2AW	0.00
3	Credit institutions	3AT	0.00	3AU	0.00	3AV	0.00	3AW	0.00
4	Loans and advances	4AT	0.00	4AU	0.00	4AV	0.00	4AW	0.00
5	UoP Debt securities, including	5AT	0.00	5AU	0.00	5AV	0.00	5AW	0.00
6	Equity instruments	6AT	0.00	6AU	0.00			6AW	0.00
7	Other financial corporations	7AT	0.00	7AU	0.00	7AV	0.00	7AW	0.00

**GAR001- T-1 Capex**

8	Of which: investment firms	8AT	0.00	8AU	0.00	8AV	0.00	8AW	0.00
9	Loans and advances	9AT	0.00	9AU	0.00	9AV	0.00	9AW	0.00
10	UoP Debt securities, including	10AT	0.00	10AU	0.00	10AV	0.00	10AW	0.00
11	Equity instruments	11AT	0.00	11AU	0.00			11AW	0.00
12	Of which: management companies	12AT	0.00	12AU	0.00	12AV	0.00	12AW	0.00
13	Loans and advances	13AT	0.00	13AU	0.00	13AV	0.00	13AW	0.00
14	UoP Debt securities, including	14AT	0.00	14AU	0.00	14AV	0.00	14AW	0.00
15	Equity instruments	15AT	0.00	15AU	0.00			15AW	0.00
16	Of which: insurance undertakings	16AT	0.00	16AU	0.00	16AV	0.00	16AW	0.00
17	Loans and advances	17AT	0.00	17AU	0.00	17AV	0.00	17AW	0.00
18	UoP Debt securities, including	18AT	0.00	18AU	0.00	18AV	0.00	18AW	0.00
19	Equity instruments	19AT	0.00	19AU	0.00			19AW	0.00
20	Non-financial undertakings	20AT	0.00	20AU	0.00	20AV	0.00	20AW	0.00
21	Loans and advances	21AT	0.00	21AU	0.00	21AV	0.00	21AW	0.00
22	UoP Debt securities, including	22AT	0.00	22AU	0.00	22AV	0.00	22AW	0.00
23	Equity instruments	23AT	0.00	23AU	0.00			23AW	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28AT	0.00	28AU	0.00	28AV	0.00	28AW	0.00
29	Housing financing	29AT	0.00	29AU	0.00	29AV	0.00	29AW	0.00
30	Local governments financing	30AT	0.00	30AU	0.00	30AV	0.00	30AW	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AT	0.00	31AU	0.00	31AV	0.00	31AW	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AT	0.00	32AU	0.00	32AV	0.00	32AW	0.00

**GAR001- T-1 Capex**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48AT	0.00	48AU	0.00	48AV	0.00	48AW	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53AT	0.00	53AU	0.00	53AV	0.00	53AW	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AT	0.00	55AU	0.00	55AV	0.00	55AW	0.00
55	Assets under management	56AT	0.00	56AU	0.00	56AV	0.00	56AW	0.00
56	Of which: debt securities	57AT	0.00	57AU	0.00	57AV	0.00	57AW	0.00

**GAR001- T-1 Capex**

57	Of which: equity instruments	58AT	0.00	58AU	0.00	58AV	0.00	58AW	0.00
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Disclosure reference date T- 1									
Pollution Prevention and Control (PPC)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
							Of which: use of proceeds		Of which: enabling
		ay		az		ba		bb	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1AX	0.00	1AY	0.00	1AZ	0.00	1BA	0.00
2	Financial undertakings	2AX	0.00	2AY	0.00	2AZ	0.00	2BA	0.00
3	Credit institutions	3AX	0.00	3AY	0.00	3AZ	0.00	3BA	0.00
4	Loans and advances	4AX	0.00	4AY	0.00	4AZ	0.00	4BA	0.00
5	UoP Debt securities, including	5AX	0.00	5AY	0.00	5AZ	0.00	5BA	0.00
6	Equity instruments	6AX	0.00	6AY	0.00			6BA	0.00
7	Other financial corporations	7AX	0.00	7AY	0.00	7AZ	0.00	7BA	0.00
8	Of which: investment firms	8AX	0.00	8AY	0.00	8AZ	0.00	8BA	0.00
9	Loans and advances	9AX	0.00	9AY	0.00	9AZ	0.00	9BA	0.00
10	UoP Debt securities, including	10AX	0.00	10AY	0.00	10AZ	0.00	10BA	0.00
11	Equity instruments	11AX	0.00	11AY	0.00			11BA	0.00
12	Of which: management companies	12AX	0.00	12AY	0.00	12AZ	0.00	12BA	0.00
13	Loans and advances	13AX	0.00	13AY	0.00	13AZ	0.00	13BA	0.00



**GAR001- T-1 Capex**

14	UoP	Debt securities, including	14AX	0.00	14AY	0.00	14AZ	0.00	14BA	0.00
15		Equity instruments	15AX	0.00	15AY	0.00			15BA	0.00
16		Of which: insurance undertakings	16AX	0.00	16AY	0.00	16AZ	0.00	16BA	0.00
17		Loans and advances	17AX	0.00	17AY	0.00	17AZ	0.00	17BA	0.00
18	UoP	Debt securities, including	18AX	0.00	18AY	0.00	18AZ	0.00	18BA	0.00
19		Equity instruments	19AX	0.00	19AY	0.00			19BA	0.00
20		Non-financial undertakings	20AX	0.00	20AY	0.00	20AZ	0.00	20BA	0.00
21		Loans and advances	21AX	0.00	21AY	0.00	21AZ	0.00	21BA	0.00
22	UoP	Debt securities, including	22AX	0.00	22AY	0.00	22AZ	0.00	22BA	0.00
23		Equity instruments	23AX	0.00	23AY	0.00			23BA	0.00
24		Households								
25		Of which: loans collateralised by residential immovable property								
26		Of which: building renovation loans								
27		Of which: motor vehicle loans								
28		Local governments financing	28AX	0.00	28AY	0.00	28AZ	0.00	28BA	0.00
29		Housing financing	29AX	0.00	29AY	0.00	29AZ	0.00	29BA	0.00
30		Local governments financing	30AX	0.00	30AY	0.00	30AZ	0.00	30BA	0.00
31		Collateral obtained by taking possession: residential and commercial immovable properties	31AX	0.00	31AY	0.00	31AZ	0.00	31BA	0.00
32		Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AX	0.00	32AY	0.00	32AZ	0.00	32BA	0.00
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								

**GAR001- T-1 Capex**

38	Debt securities								
39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure 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	48AX	0.00	48AY	0.00	48AZ	0.00	48BA	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53AX	0.00	53AY	0.00	53AZ	0.00	53BA	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55AX	0.00	55AY	0.00	55AZ	0.00	55BA	0.00
55	Assets under management	56AX	0.00	56AY	0.00	56AZ	0.00	56BA	0.00
56	Of which: debt securities	57AX	0.00	57AY	0.00	57AZ	0.00	57BA	0.00
57	Of which: equity instruments	58AX	0.00	58AY	0.00	58AZ	0.00	58BA	0.00

Disclosure reference date T- 1

**GAR001- T-1 Capex**

Biodiversity and ecosystems (BIO)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		bc		bd		be		bf	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1BB	0.00	1BC	0.00	1BD	0.00	1BE	0.00
2	Financial undertakings	2BB	0.00	2BC	0.00	2BD	0.00	2BE	0.00
3	Credit institutions	3BB	0.00	3BC	0.00	3BD	0.00	3BE	0.00
4	Loans and advances	4BB	0.00	4BC	0.00	4BD	0.00	4BE	0.00
5	Debt securities, including UoP	5BB	0.00	5BC	0.00	5BD	0.00	5BE	0.00
6	Equity instruments	6BB	0.00	6BC	0.00			6BE	0.00
7	Other financial corporations	7BB	0.00	7BC	0.00	7BD	0.00	7BE	0.00
8	Of which: investment firms	8BB	0.00	8BC	0.00	8BD	0.00	8BE	0.00
9	Loans and advances	9BB	0.00	9BC	0.00	9BD	0.00	9BE	0.00
10	Debt securities, including UoP	10BB	0.00	10BC	0.00	10BD	0.00	10BE	0.00
11	Equity instruments	11BB	0.00	11BC	0.00			11BE	0.00
12	Of which: management companies	12BB	0.00	12BC	0.00	12BD	0.00	12BE	0.00
13	Loans and advances	13BB	0.00	13BC	0.00	13BD	0.00	13BE	0.00
14	Debt securities, including UoP	14BB	0.00	14BC	0.00	14BD	0.00	14BE	0.00
15	Equity instruments	15BB	0.00	15BC	0.00			15BE	0.00
16	Of which: insurance undertakings	16BB	0.00	16BC	0.00	16BD	0.00	16BE	0.00
17	Loans and advances	17BB	0.00	17BC	0.00	17BD	0.00	17BE	0.00
18	Debt securities, including UoP	18BB	0.00	18BC	0.00	18BD	0.00	18BE	0.00
19	Equity instruments	19BB	0.00	19BC	0.00			19BE	0.00

**GAR001- T-1 Capex**

20	Non-financial undertakings	20BB	0.00	20BC	0.00	20BD	0.00	20BE	0.00
21	Loans and advances	21BB	0.00	21BC	0.00	21BD	0.00	21BE	0.00
22	Debt securities, including	22BB	0.00	22BC	0.00	22BD	0.00	22BE	0.00
23	Equity instruments	23BB	0.00	23BC	0.00			23BE	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28BB	0.00	28BC	0.00	28BD	0.00	28BE	0.00
29	Housing financing	29BB	0.00	29BC	0.00	29BD	0.00	29BE	0.00
30	Local governments financing	30BB	0.00	30BC	0.00	30BD	0.00	30BE	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31BB	0.00	31BC	0.00	31BD	0.00	31BE	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32BB	0.00	32BC	0.00	32BD	0.00	32BE	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								

**GAR001- T-1 Capex**

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	48BB	0.00	48BC	0.00	48BD	0.00	48BE	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53BB	0.00	53BC	0.00	53BD	0.00	53BE	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55BB	0.00	55BC	0.00	55BD	0.00	55BE	0.00
55	Assets under management	56BB	0.00	56BC	0.00	56BD	0.00	56BE	0.00
56	Of which: debt securities	57BB	0.00	57BC	0.00	57BD	0.00	57BE	0.00
57	Of which: equity instruments	58BB	0.00	58BC	0.00	58BD	0.00	58BE	0.00

Disclosure reference date T- 1					
TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
EUR m	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which: use of proceeds	Of which: transitional	Of which: enabling
	bg	bh	bi	bj	bk

**GAR001- T-1 Capex**

	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1BF	4,617,898,255.58	1BG	402,162,848.39	1BH	379,462,975.79	1BI	7,528,198.10	1BJ	8,532,666.97
2	Financial undertakings	2BF	0.00	2BG	0.00	2BH	0.00	2BI	0.00	2BJ	0.00
3	Credit institutions	3BF	0.00	3BG	0.00	3BH	0.00	3BI	0.00	3BJ	0.00
4	Loans and advances	4BF	0.00	4BG	0.00	4BH	0.00	4BI	0.00	4BJ	0.00
5	Debt securities, including UoP	5BF	0.00	5BG	0.00	5BH	0.00	5BI	0.00	5BJ	0.00
6	Equity instruments	6BF	0.00	6BG	0.00			6BI	0.00	6BJ	0.00
7	Other financial corporations	7BF	0.00	7BG	0.00	7BH	0.00	7BI	0.00	7BJ	0.00
8	Of which: investment firms	8BF	0.00	8BG	0.00	8BH	0.00	8BI	0.00	8BJ	0.00
9	Loans and advances	9BF	0.00	9BG	0.00	9BH	0.00	9BI	0.00	9BJ	0.00
10	Debt securities, including UoP	10BF	0.00	10BG	0.00	10BH	0.00	10BI	0.00	10BJ	0.00
11	Equity instruments	11BF	0.00	11BG	0.00			11BI	0.00	11BJ	0.00
12	Of which: management companies	12BF	0.00	12BG	0.00	12BH	0.00	12BI	0.00	12BJ	0.00
13	Loans and advances	13BF	0.00	13BG	0.00	13BH	0.00	13BI	0.00	13BJ	0.00
14	Debt securities, including UoP	14BF	0.00	14BG	0.00	14BH	0.00	14BI	0.00	14BJ	0.00
15	Equity instruments	15BF	0.00	15BG	0.00			15BI	0.00	15BJ	0.00
16	Of which: insurance undertakings	16BF	0.00	16BG	0.00	16BH	0.00	16BI	0.00	16BJ	0.00
17	Loans and advances	17BF	0.00	17BG	0.00	17BH	0.00	17BI	0.00	17BJ	0.00
18	Debt securities, including UoP	18BF	0.00	18BG	0.00	18BH	0.00	18BI	0.00	18BJ	0.00
19	Equity instruments	19BF	0.00	19BG	0.00			19BI	0.00	19BJ	0.00
20	Non-financial undertakings	20BF	57,152,596.39	20BG	22,699,872.60	20BH	0.00	20BI	7,528,198.10	20BJ	8,532,666.97
21	Loans and advances	21BF	26,228,921.11	21BG	11,849,031.65	21BH	0.00	21BI	6,297,277.06	21BJ	2,613,053.71
22	Debt securities, including UoP	22BF	28,840,376.15	22BG	10,561,064.53	22BH	0.00	22BI	1,229,116.62	22BJ	5,785,280.59

**GAR001- T-1 Capex**

23	Equity instruments	23BF	2,083,299.14	23BG	289,776.42			23BI	1,804.41	23BJ	134,332.66
24	Households	24BF	4,547,391,480.03	24BG	379,462,975.79	24BH	379,462,975.79	24BI	0.00	24BJ	0.00
25	Of which: loans collateralised by residential immovable property	25BF	4,316,628,375.71	25BG	372,949,889.63	25BH	372,949,889.63	25BI	0.00	25BJ	0.00
26	Of which: building renovation loans	26BF	186,773,037.59	26BG	6,513,086.16	26BH	6,513,086.16	26BI	0.00	26BJ	0.00
27	Of which: motor vehicle loans	27BF	43,990,066.73	27BG	0.00	27BH	0.00	27BI	0.00	27BJ	0.00
28	Local governments financing	28BF	0.00	28BG	0.00	28BH	0.00	28BI	0.00	28BJ	0.00
29	Housing financing	29BF	0.00	29BG	0.00	29BH	0.00	29BI	0.00	29BJ	0.00
30	Local governments financing	30BF	0.00	30BG	0.00	30BH	0.00	30BI	0.00	30BJ	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31BF	13,354,179.16	31BG	0.00	31BH	0.00	31BI	0.00	31BJ	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32BF	0.00	32BG	0.00	32BH	0.00	32BI	0.00	32BJ	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations										
41	Loans and advances										
42	Debt securities										
43	Equity instruments										



**GAR001- Capex flow**

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	48BF	4,617,898,255.58	48BG	402,162,848.39	48BH	379,462,975.79	48BI	7,528,198.10	48BJ	8,532,666.97
49	Assets not covered for GAR calculation										
50	Central government and Supranational issuers										
51	Central banks exposure										
52	Trading book										
53	Total assets	53BF	4,617,898,255.58	53BG	402,162,848.39	53BH	379,462,975.79	53BI	7,528,198.10	53BJ	8,532,666.97
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations										
54	Financial guarantees	55BF	0.00	55BG	0.00	55BH	0.00	55BI	0.00	55BJ	0.00
55	Assets under management	56BF	0.00	56BG	0.00	56BH	0.00	56BI	0.00	56BJ	0.00
56	Of which: debt securities	57BF	0.00	57BG	0.00	57BH	0.00	57BI	0.00	57BJ	0.00
57	Of which: equity instruments	58BF	0.00	58BG	0.00	58BH	0.00	58BI	0.00	58BJ	0.00

**GAR001 – Capex flow**

Disclosure reference date T			
EUR m	Opening amount (at contract date)	Climate Change Mitigation (CCM)	
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
			Of which environmentally sustainable (Taxonomy-aligned)

**GAR001- Capex flow**

								Of which: use of proceeds		Of which: transitional		Of which: enabling	
		ag		ah		ai		aj		ak		al	
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1A	1,092,537,505.93	1B	894,483,666.81	1C	213,980,401.03	1D	197,205,995.11	1E	0.00	1F	16,484,598.90
2	Financial undertakings	2A	0.00	2B	0.00	2C	0.00	2D	0.00	2E	0.00	2F	0.00
3	Credit institutions	3A	0.00	3B	0.00	3C	0.00	3D	0.00	3E	0.00	3F	0.00
4	Loans and advances	4A	0.00	4B	0.00	4C	0.00	4D	0.00	4E	0.00	4F	0.00
5	Debt securities, including UoP	5A	0.00	5B	0.00	5C	0.00	5D	0.00	5E	0.00	5F	0.00
6	Equity instruments	6A	0.00	6B	0.00	6C	0.00			6E	0.00	6F	0.00
7	Other financial corporations	7A	0.00	7B	0.00	7C	0.00	7D	0.00	7E	0.00	7F	0.00
8	Of which: Investment firms	8A	0.00	8B	0.00	8C	0.00	8D	0.00	8E	0.00	8F	0.00
9	Loans and advances	9A	0.00	9B	0.00	9C	0.00	9D	0.00	9E	0.00	9F	0.00
10	Debt securities, including UoP	10A	0.00	10B	0.00	10C	0.00	10D	0.00	10E	0.00	10F	0.00
11	Equity instruments	11A	0.00	11B	0.00	11C	0.00			11E	0.00	11F	0.00
12	Of which: Management companies	12A	0.00	12B	0.00	12C	0.00	12D	0.00	12E	0.00	12F	0.00
13	Loans and advances	13A	0.00	13B	0.00	13C	0.00	13D	0.00	13E	0.00	13F	0.00
14	Debt securities, including UoP	14A	0.00	14B	0.00	14C	0.00	14D	0.00	14E	0.00	14F	0.00
15	Equity instruments	15A	0.00	15B	0.00	15C	0.00			15E	0.00	15F	0.00
16	Of which: Insurance undertakings	16A	0.00	16B	0.00	16C	0.00	16D	0.00	16E	0.00	16F	0.00
17	Loans and advances	17A	0.00	17B	0.00	17C	0.00	17D	0.00	17E	0.00	17F	0.00
18	Debt securities, including UoP	18A	0.00	18B	0.00	18C	0.00	18D	0.00	18E	0.00	18F	0.00
19	Equity instruments	19A	0.00	19B	0.00	19C	0.00			19E	0.00	19F	0.00

**GAR001- Capex flow**

20	Non-financial undertakings	20A	243,403,713.78	20B	45,349,874.66	20C	16,774,405.92	20D	0.00	20E	0.00	20F	16,484,598.90
21	Loans and advances	21A	243,403,713.78	21B	45,349,874.66	21C	16,774,405.92	21D	0.00	21E	0.00	21F	16,484,598.90
22	Debt securities, including UoP	22A	0.00	22B	0.00	22C	0.00	22D	0.00	22E	0.00	22F	0.00
23	Equity instruments	23A	0.00	23B	0.00	23C	0.00			23E	0.00	23F	0.00
24	Households	24A	849,133,792.15	24B	849,133,792.15	24C	197,205,995.11	24D	197,205,995.11	24E	0.00	24F	0.00
25	Of which: loans collateralised by residential immovable property	25A	767,189,109.11	25B	767,189,109.11	25C	196,855,995.11	25D	196,855,995.11	25E	0.00	25F	0.00
26	Of which: building renovation loans	26A	60,863,014.10	26B	60,863,014.10	26C	350.000.00	26D	350.000.00	26E	0.00	26F	0.00
27	Of which: motor vehicle loans	27A	21,081,668.94	27B	21,081,668.94	27C	0.00	27D	0.00	27E	0.00	27F	0.00
28	Local governments financing	28A	0.00	28B	0.00	28C	0.00	28D	0.00	28E	0.00	28F	0.00
29	Housing financing	29A	0.00	29B	0.00	29C	0.00	29D	0.00	29E	0.00	29F	0.00
30	Local governments financing	30A	0.00	30B	0.00	30C	0.00	30D	0.00	30E	0.00	30F	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31A	1,420.009.94	31B	1,420.009.94	31C	0.00	31D	0.00	31E	0.00	31F	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32A	2,158,941,396.09	32B	0.00	32C	0.00	32D	0.00	32E	0.00	32F	0.00
33	Financial and Non-financial undertakings	33A	1,670,679,152.99										
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34A	1,667,481,579.70										
35	Loans and advances	35A	1,667,481,579.70										
36	Of which: loans collateralised by commercial immovable property	36A	368,286,568.35										
37	Of which: building renovation loans	37A	531,413.09										
38	Debt securities	38A	0.00										

**GAR001- Capex flow**

39	Equity instruments	39A	0.00										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	40A	3,197,573.30										
41	Loans and advances	41A	3,197,573.30										
42	Debt securities	42A	0.00										
43	Equity instruments	43A	0.00										
44	Derivatives	44A	0.00										
45	On demand interbank loans	45A	0.00										
46	Cash and cash-related assets	46A	466,204.45										
47	Other categories of assets (e.g. goodwill, commodities etc.)	47A	487,796,038.65										
48	Total GAR assets	48A	3,252,898,911.95	48B	895,903,676.75	48C	213,980,401.03	48D	197,205,995.11	48E	0.00	48F	16,484,598.90
49	Assets not covered for GAR calculation	49A	1,579,152,258.45										
50	Central government and Supranational issuers	50A	79,152,258.45										
51	Central banks exposure	51A	1,500.000.000.00										
52	Trading book	52A	0.00										
53	Total assets	53A	4,832,051,170.40	53B	895,903,676.75	53C	213,980,401.03	53D	197,205,995.11	53E	0.00	53F	16,484,598.90
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations												
54	Financial guarantees	55A	41,593,402.66	55B	0.00	55C	0.00	55D	0.00	55E	0.00	55F	0.00
55	Assets under management	56A	0.00	56B	0.00	56C	0.00	56D	0.00	56E	0.00	56F	0.00
56	Of which: debt securities	57A	0.00	57B	0.00	57C	0.00	57D	0.00	57E	0.00	57F	0.00
57	Of which: equity instruments	58A	0.00	58B	0.00	58C	0.00	58D	0.00	58E	0.00	58F	0.00

**GAR001- Capex flow**

Disclosure reference date T									
Climate Change Adaptation (CCA)									
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		am	an	ao	ap				
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1G	7,200.00	1H	0.00	1I	0.00	1J	0.00
2	Financial undertakings	2G	0.00	2H	0.00	2I	0.00	2J	0.00
3	Credit institutions	3G	0.00	3H	0.00	3I	0.00	3J	0.00
4	Loans and advances	4G	0.00	4H	0.00	4I	0.00	4J	0.00
5	Debt securities, including UoP	5G	0.00	5H	0.00	5I	0.00	5J	0.00
6	Equity instruments	6G	0.00	6H	0.00			6J	0.00
7	Other financial corporations	7G	0.00	7H	0.00	7I	0.00	7J	0.00
8	Of which: Investment firms	8G	0.00	8H	0.00	8I	0.00	8J	0.00
9	Loans and advances	9G	0.00	9H	0.00	9I	0.00	9J	0.00
10	Debt securities, including UoP	10G	0.00	10H	0.00	10I	0.00	10J	0.00
11	Equity instruments	11G	0.00	11H	0.00			11J	0.00
12	Of which: Management companies	12G	0.00	12H	0.00	12I	0.00	12J	0.00
13	Loans and advances	13G	0.00	13H	0.00	13I	0.00	13J	0.00
14	Debt securities, including UoP	14G	0.00	14H	0.00	14I	0.00	14J	0.00
15	Equity instruments	15G	0.00	15H	0.00			15J	0.00
16	Of which: Insurance undertakings	16G	0.00	16H	0.00	16I	0.00	16J	0.00

**GAR001- Capex flow**

17	Loans and advances	17G	0.00	17H	0.00	17I	0.00	17J	0.00
18	UoP Debt securities, including	18G	0.00	18H	0.00	18I	0.00	18J	0.00
19	Equity instruments	19G	0.00	19H	0.00			19J	0.00
20	Non-financial undertakings	20G	7,200.00	20H	0.00	20I	0.00	20J	0.00
21	Loans and advances	21G	7,200.00	21H	0.00	21I	0.00	21J	0.00
22	UoP Debt securities, including	22G	0.00	22H	0.00	22I	0.00	22J	0.00
23	Equity instruments	23G	0.00	23H	0.00			23J	0.00
24	Households	24G	0.00	24H	0.00	24I	0.00	24J	0.00
25	Of which: loans collateralised by residential immovable property	25G	0.00	25H	0.00	25I	0.00	25J	0.00
26	Of which: building renovation loans	26G	0.00	26H	0.00	26I	0.00	26J	0.00
27	Of which: motor vehicle loans	27G	0.00	27H	0.00	27I	0.00	27J	0.00
28	Local governments financing	28G	0.00	28H	0.00	28I	0.00	28J	0.00
29	Housing financing	29G	0.00	29H	0.00	29I	0.00	29J	0.00
30	Local governments financing	30G	0.00	30H	0.00	30I	0.00	30J	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31G	0.00	31H	0.00	31I	0.00	31J	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32G	0.00	32H	0.00	32I	0.00	32J	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								

**GAR001- Capex flow**

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	48G	7,200.00	48H	0.00	48I	0.00	48J	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53G	7,200.00	53H	0.00	53I	0.00	53J	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55G	0.00	55H	0.00	55I	0.00	55J	0.00
55	Assets under management	56G	0.00	56H	0.00	56I	0.00	56J	0.00
56	Of which: debt securities	57G	0.00	57H	0.00	57I	0.00	57J	0.00
57	Of which: equity instruments	58G	0.00	58H	0.00	58I	0.00	58J	0.00

Disclosure reference date T		
Water and Marine Resources (WTR)		
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
		Of which environmentally sustainable (Taxonomy-aligned)



**GAR001- Capex flow**

						Of which: use of proceeds		Of which: enabling	
		aq		ar		as		at	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1K	253,063.52	1L	0.00	1M	0.00	1N	0.00
2	Financial undertakings	2K	0.00	2L	0.00	2M	0.00	2N	0.00
3	Credit institutions	3K	0.00	3L	0.00	3M	0.00	3N	0.00
4	Loans and advances	4K	0.00	4L	0.00	4M	0.00	4N	0.00
5	UoP Debt securities, including	5K	0.00	5L	0.00	5M	0.00	5N	0.00
6	Equity instruments	6K	0.00	6L	0.00			6N	0.00
7	Other financial corporations	7K	0.00	7L	0.00	7M	0.00	7N	0.00
8	Of which: Investment firms	8K	0.00	8L	0.00	8M	0.00	8N	0.00
9	Loans and advances	9K	0.00	9L	0.00	9M	0.00	9N	0.00
10	UoP Debt securities, including	10K	0.00	10L	0.00	10M	0.00	10N	0.00
11	Equity instruments	11K	0.00	11L	0.00			11N	0.00
12	Of which: Management companies	12K	0.00	12L	0.00	12M	0.00	12N	0.00
13	Loans and advances	13K	0.00	13L	0.00	13M	0.00	13N	0.00
14	UoP Debt securities, including	14K	0.00	14L	0.00	14M	0.00	14N	0.00
15	Equity instruments	15K	0.00	15L	0.00			15N	0.00
16	Of which: Insurance undertakings	16K	0.00	16L	0.00	16M	0.00	16N	0.00
17	Loans and advances	17K	0.00	17L	0.00	17M	0.00	17N	0.00
18	UoP Debt securities, including	18K	0.00	18L	0.00	18M	0.00	18N	0.00
19	Equity instruments	19K	0.00	19L	0.00			19N	0.00
20	Non-financial undertakings	20K	253,063.52	20L	0.00	20M	0.00	20N	0.00
21	Loans and advances	21K	253,063.52	21L	0.00	21M	0.00	21N	0.00
22	UoP Debt securities, including	22K	0.00	22L	0.00	22M	0.00	22N	0.00

**GAR001- Capex flow**

23	Equity instruments	23K	0.00	23L	0.00			23N	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28K	0.00	28L	0.00	28M	0.00	28N	0.00
29	Housing financing	29K	0.00	29L	0.00	29M	0.00	29N	0.00
30	Local governments financing	30K	0.00	30L	0.00	30M	0.00	30N	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31K	0.00	31L	0.00	31M	0.00	31N	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32K	0.00	32L	0.00	32M	0.00	32N	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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.)								

**GAR001- Capex flow**

48	Total GAR assets	48K	253,063.52	48L	0.00	48M	0.00	48N	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53K	253,063.52	53L	0.00	53M	0.00	53N	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55K	0.00	55L	0.00	55M	0.00	55N	0.00
55	Assets under management	56K	0.00	56L	0.00	56M	0.00	56N	0.00
56	Of which: debt securities	57K	0.00	57L	0.00	57M	0.00	57N	0.00
57	Of which: equity instruments	58K	0.00	58L	0.00	58M	0.00	58N	0.00

Disclosure reference date T									
Circular Economy (CE)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		au		av		aw		ax	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1O	0.00	1P	0.00	1Q	0.00	1R	0.00
2	Financial undertakings	2O	0.00	2P	0.00	2Q	0.00	2R	0.00
3	Credit institutions	3O	0.00	3P	0.00	3Q	0.00	3R	0.00

**GAR001- Capex flow**

4	Loans and advances	40	0.00	4P	0.00	4Q	0.00	4R	0.00
5	UoP Debt securities, including	50	0.00	5P	0.00	5Q	0.00	5R	0.00
6	Equity instruments	60	0.00	6P	0.00			6R	0.00
7	Other financial corporations	70	0.00	7P	0.00	7Q	0.00	7R	0.00
8	Of which: Investment firms	80	0.00	8P	0.00	8Q	0.00	8R	0.00
9	Loans and advances	90	0.00	9P	0.00	9Q	0.00	9R	0.00
10	UoP Debt securities, including	100	0.00	10P	0.00	10Q	0.00	10R	0.00
11	Equity instruments	110	0.00	11P	0.00			11R	0.00
12	Of which: Management companies	120	0.00	12P	0.00	12Q	0.00	12R	0.00
13	Loans and advances	130	0.00	13P	0.00	13Q	0.00	13R	0.00
14	UoP Debt securities, including	140	0.00	14P	0.00	14Q	0.00	14R	0.00
15	Equity instruments	150	0.00	15P	0.00			15R	0.00
16	Of which: Insurance undertakings	160	0.00	16P	0.00	16Q	0.00	16R	0.00
17	Loans and advances	170	0.00	17P	0.00	17Q	0.00	17R	0.00
18	UoP Debt securities, including	180	0.00	18P	0.00	18Q	0.00	18R	0.00
19	Equity instruments	190	0.00	19P	0.00			19R	0.00
20	Non-financial undertakings	200	0.00	20P	0.00	20Q	0.00	20R	0.00
21	Loans and advances	210	0.00	21P	0.00	21Q	0.00	21R	0.00
22	UoP Debt securities, including	220	0.00	22P	0.00	22Q	0.00	22R	0.00
23	Equity instruments	230	0.00	23P	0.00			23R	0.00
24	Households	240	0.00	24P	0.00	24Q	0.00	24R	0.00
25	Of which: loans collateralised by residential immovable property	250	0.00	25P	0.00	25Q	0.00	25R	0.00
26	Of which: building renovation loans	260	0.00	26P	0.00	26Q	0.00	26R	0.00
27	Of which: motor vehicle loans	270	0.00	27P	0.00	27Q	0.00	27R	0.00
28	Local governments financing	280	0.00	28P	0.00	28Q	0.00	28R	0.00
29	Housing financing	290	0.00	29P	0.00	29Q	0.00	29R	0.00

**GAR001- Capex flow**

30	Local governments financing	30O	0.00	30P	0.00	30Q	0.00	30R	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31O	0.00	31P	0.00	31Q	0.00	31R	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32O	0.00	32P	0.00	32Q	0.00	32R	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48O	0.00	48P	0.00	48Q	0.00	48R	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53O	0.00	53P	0.00	53Q	0.00	53R	0.00

**GAR001- Capex flow**

	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55O	0.00	55P	0.00	55Q	0.00	55R	0.00
55	Assets under management	56O	0.00	56P	0.00	56Q	0.00	56R	0.00
56	Of which: debt securities	57O	0.00	57P	0.00	57Q	0.00	57R	0.00
57	Of which: equity instruments	58O	0.00	58P	0.00	58Q	0.00	58R	0.00

Disclosure reference date T									
Pollution Prevention and Control (PPC)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		ay		az		ba		bb	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1S	0.00	1T	0.00	1U	0.00	1V	0.00
2	Financial undertakings	2S	0.00	2T	0.00	2U	0.00	2V	0.00
3	Credit institutions	3S	0.00	3T	0.00	3U	0.00	3V	0.00
4	Loans and advances	4S	0.00	4T	0.00	4U	0.00	4V	0.00
5	UoP Debt securities, including	5S	0.00	5T	0.00	5U	0.00	5V	0.00
6	Equity instruments	6S	0.00	6T	0.00			6V	0.00
7	Other financial corporations	7S	0.00	7T	0.00	7U	0.00	7V	0.00
8	Of which: Investment firms	8S	0.00	8T	0.00	8U	0.00	8V	0.00

**GAR001- Capex flow**

9	Loans and advances	9S	0.00	9T	0.00	9U	0.00	9V	0.00
10	UoP Debt securities, including	10S	0.00	10T	0.00	10U	0.00	10V	0.00
11	Equity instruments	11S	0.00	11T	0.00			11V	0.00
12	Of which: Management companies	12S	0.00	12T	0.00	12U	0.00	12V	0.00
13	Loans and advances	13S	0.00	13T	0.00	13U	0.00	13V	0.00
14	UoP Debt securities, including	14S	0.00	14T	0.00	14U	0.00	14V	0.00
15	Equity instruments	15S	0.00	15T	0.00			15V	0.00
16	Of which: Insurance undertakings	16S	0.00	16T	0.00	16U	0.00	16V	0.00
17	Loans and advances	17S	0.00	17T	0.00	17U	0.00	17V	0.00
18	UoP Debt securities, including	18S	0.00	18T	0.00	18U	0.00	18V	0.00
19	Equity instruments	19S	0.00	19T	0.00			19V	0.00
20	Non-financial undertakings	20S	0.00	20T	0.00	20U	0.00	20V	0.00
21	Loans and advances	21S	0.00	21T	0.00	21U	0.00	21V	0.00
22	UoP Debt securities, including	22S	0.00	22T	0.00	22U	0.00	22V	0.00
23	Equity instruments	23S	0.00	23T	0.00			23V	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28S	0.00	28T	0.00	28U	0.00	28V	0.00
29	Housing financing	29S	0.00	29T	0.00	29U	0.00	29V	0.00
30	Local governments financing	30S	0.00	30T	0.00	30U	0.00	30V	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31S	0.00	31T	0.00	31U	0.00	31V	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32S	0.00	32T	0.00	32U	0.00	32V	0.00
33	Financial and Non-financial undertakings								

**GAR001- Capex flow**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48S	0.00	48T	0.00	48U	0.00	48V	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53S	0.00	53T	0.00	53U	0.00	53V	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55S	0.00	55T	0.00	55U	0.00	55V	0.00
55	Assets under management	56S	0.00	56T	0.00	56U	0.00	56V	0.00
56	Of which: debt securities	57S	0.00	57T	0.00	57U	0.00	57V	0.00
57	Of which: equity instruments	58S	0.00	58T	0.00	58U	0.00	58V	0.00



**GAR001- Capex flow**

Disclosure reference date T									
Biodiversity and ecosystems (BIO)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		bc		bd		be		bf	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1W	0.00	1X	0.00	1Y	0.00	1Z	0.00
2	Financial undertakings	2W	0.00	2X	0.00	2Y	0.00	2Z	0.00
3	Credit institutions	3W	0.00	3X	0.00	3Y	0.00	3Z	0.00
4	Loans and advances	4W	0.00	4X	0.00	4Y	0.00	4Z	0.00
5	UoP Debt securities, including	5W	0.00	5X	0.00	5Y	0.00	5Z	0.00
6	Equity instruments	6W	0.00	6X	0.00			6Z	0.00
7	Other financial corporations	7W	0.00	7X	0.00	7Y	0.00	7Z	0.00
8	Of which: Investment firms	8W	0.00	8X	0.00	8Y	0.00	8Z	0.00
9	Loans and advances	9W	0.00	9X	0.00	9Y	0.00	9Z	0.00
10	UoP Debt securities, including	10W	0.00	10X	0.00	10Y	0.00	10Z	0.00
11	Equity instruments	11W	0.00	11X	0.00			11Z	0.00
12	Of which: Management companies	12W	0.00	12X	0.00	12Y	0.00	12Z	0.00
13	Loans and advances	13W	0.00	13X	0.00	13Y	0.00	13Z	0.00
14	UoP Debt securities, including	14W	0.00	14X	0.00	14Y	0.00	14Z	0.00

**GAR001- Capex flow**

15	Equity instruments	15W	0.00	15X	0.00			15Z	0.00
16	Of which: Insurance undertakings	16W	0.00	16X	0.00	16Y	0.00	16Z	0.00
17	Loans and advances	17W	0.00	17X	0.00	17Y	0.00	17Z	0.00
18	UoP Debt securities, including	18W	0.00	18X	0.00	18Y	0.00	18Z	0.00
19	Equity instruments	19W	0.00	19X	0.00			19Z	0.00
20	Non-financial undertakings	20W	0.00	20X	0.00	20Y	0.00	20Z	0.00
21	Loans and advances	21W	0.00	21X	0.00	21Y	0.00	21Z	0.00
22	UoP Debt securities, including	22W	0.00	22X	0.00	22Y	0.00	22Z	0.00
23	Equity instruments	23W	0.00	23X	0.00			23Z	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28W	0.00	28X	0.00	28Y	0.00	28Z	0.00
29	Housing financing	29W	0.00	29X	0.00	29Y	0.00	29Z	0.00
30	Local governments financing	30W	0.00	30X	0.00	30Y	0.00	30Z	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31W	0.00	31X	0.00	31Y	0.00	31Z	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32W	0.00	32X	0.00	32Y	0.00	32Z	0.00
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								

**GAR001- Capex flow**

39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure 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	48W	0.00	48X	0.00	48Y	0.00	48Z	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53W	0.00	53X	0.00	53Y	0.00	53Z	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55W	0.00	55X	0.00	55Y	0.00	55Z	0.00
55	Assets under management	56W	0.00	56X	0.00	56Y	0.00	56Z	0.00
56	Of which: debt securities	57W	0.00	57X	0.00	57Y	0.00	57Z	0.00
57	Of which: equity instruments	58W	0.00	58X	0.00	58Y	0.00	58Z	0.00

Disclosure reference date T

TOTAL (CCM + CCA + WTR + CE + PPC + BIO)

**GAR001- Capex flow**

Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
EUR m		Of which environmentally sustainable (Taxonomy-aligned)									
						Of which: use of proceeds		Of which: transitional		Of which: enabling	
		bg		bh		bi		bj		bk	
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AA	894,743,930.33	1AB	213,980,401.03	1AC	197,205,995.11	1AD	0.00	1AE	16,484,598.90
2	Financial undertakings	2AA	0.00	2AB	0.00	2AC	0.00	2AD	0.00	2AE	0.00
3	Credit institutions	3AA	0.00	3AB	0.00	3AC	0.00	3AD	0.00	3AE	0.00
4	Loans and advances	4AA	0.00	4AB	0.00	4AC	0.00	4AD	0.00	4AE	0.00
5	Debt securities, including UoP	5AA	0.00	5AB	0.00	5AC	0.00	5AD	0.00	5AE	0.00
6	Equity instruments	6AA	0.00	6AB	0.00			6AD	0.00	6AE	0.00
7	Other financial corporations	7AA	0.00	7AB	0.00	7AC	0.00	7AD	0.00	7AE	0.00
8	Of which: Investment firms	8AA	0.00	8AB	0.00	8AC	0.00	8AD	0.00	8AE	0.00
9	Loans and advances	9AA	0.00	9AB	0.00	9AC	0.00	9AD	0.00	9AE	0.00
10	Debt securities, including UoP	10AA	0.00	10AB	0.00	10AC	0.00	10AD	0.00	10AE	0.00
11	Equity instruments	11AA	0.00	11AB	0.00			11AD	0.00	11AE	0.00
12	Of which: Management companies	12AA	0.00	12AB	0.00	12AC	0.00	12AD	0.00	12AE	0.00
13	Loans and advances	13AA	0.00	13AB	0.00	13AC	0.00	13AD	0.00	13AE	0.00
14	Debt securities, including UoP	14AA	0.00	14AB	0.00	14AC	0.00	14AD	0.00	14AE	0.00
15	Equity instruments	15AA	0.00	15AB	0.00			15AD	0.00	15AE	0.00
16	Of which: Insurance undertakings	16AA	0.00	16AB	0.00	16AC	0.00	16AD	0.00	16AE	0.00
17	Loans and advances	17AA	0.00	17AB	0.00	17AC	0.00	17AD	0.00	17AE	0.00

**GAR001- Capex flow**

18	Debt securities, including UoP	18AA	0.00	18AB	0.00	18AC	0.00	18AD	0.00	18AE	0.00
19	Equity instruments	19AA	0.00	19AB	0.00			19AD	0.00	19AE	0.00
20	Non-financial undertakings	20AA	45,610,138.18	20AB	16,774,405.92	20AC	0.00	20AD	0.00	20AE	16,484,598.90
21	Loans and advances	21AA	45,610,138.18	21AB	16,774,405.92	21AC	0.00	21AD	0.00	21AE	16,484,598.90
22	Debt securities, including UoP	22AA	0.00	22AB	0.00	22AC	0.00	22AD	0.00	22AE	0.00
23	Equity instruments	23AA	0.00	23AB	0.00			23AD	0.00	23AE	0.00
24	Households	24AA	849,133,792.15	24AB	197,205,995.11	24AC	197,205,995.11	24AD	0.00	24AE	0.00
25	Of which: loans collateralised by residential immovable property	25AA	767,189,109.11	25AB	196,855,995.11	25AC	196,855,995.11	25AD	0.00	25AE	0.00
26	Of which: building renovation loans	26AA	60,863,014.10	26AB	350.000.00	26AC	350.000.00	26AD	0.00	26AE	0.00
27	Of which: motor vehicle loans	27AA	21,081,668.94	27AB	0.00	27AC	0.00	27AD	0.00	27AE	0.00
28	Local governments financing	28AA	0.00	28AB	0.00	28AC	0.00	28AD	0.00	28AE	0.00
29	Housing financing	29AA	0.00	29AB	0.00	29AC	0.00	29AD	0.00	29AE	0.00
30	Local governments financing	30AA	0.00	30AB	0.00	30AC	0.00	30AD	0.00	30AE	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AA	1,420.009.94	31AB	0.00	31AC	0.00	31AD	0.00	31AE	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AA	0.00	32AB	0.00	32AC	0.00	32AD	0.00	32AE	0.00
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										

**GAR001- Capex flow**

39	Equity instruments										
40	Non-EU country counterparties not subject to NFRD disclosure 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	48AA	896,163,940.27	48AB	213,980,401.03	48AC	197,205,995.11	48AD	0.00	48AE	16,484,598.90
49	Assets not covered for GAR calculation										
50	Central government and Supranational issuers										
51	Central banks exposure										
52	Trading book										
53	Total assets	53AA	896,163,940.27	53AB	213,980,401.03	53AC	197,205,995.11	53AD	0.00	53AE	16,484,598.90
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations										
54	Financial guarantees	55AA	0.00	55AB	0.00	55AC	0.00	55AD	0.00	55AE	0.00
55	Assets under management	56AA	0.00	56AB	0.00	56AC	0.00	56AD	0.00	56AE	0.00
56	Of which: debt securities	57AA	0.00	57AB	0.00	57AC	0.00	57AD	0.00	57AE	0.00
57	Of which: equity instruments	58AA	0.00	58AB	0.00	58AC	0.00	58AD	0.00	58AE	0.00

**GAR001- Turnover flow**
**GAR001 – Turnover flow**

Disclosure reference date T													
EUR m		Climate Change Mitigation (CCM)											
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
		Opening amount (at contract date)		Of which environmentally sustainable (Taxonomy-aligned)									
						Of which: use of proceeds		Of which: transitional		Of which: enabling			
		bl		bm		bn		bo		bp		bq	
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1A	1,092,537,505.93	1B	900,257,396.63	1C	216,968,984.94	1D	197,205,995.11	1E	72,157.43	1F	18,215,177.14
2	Financial undertakings	2A	0.00	2B	0.00	2C	0.00	2D	0.00	2E	0.00	2F	0.00
3	Credit institutions	3A	0.00	3B	0.00	3C	0.00	3D	0.00	3E	0.00	3F	0.00
4	Loans and advances	4A	0.00	4B	0.00	4C	0.00	4D	0.00	4E	0.00	4F	0.00
5	Debt securities, including UoP	5A	0.00	5B	0.00	5C	0.00	5D	0.00	5E	0.00	5F	0.00
6	Equity instruments	6A	0.00	6B	0.00	6C	0.00			6E	0.00	6F	0.00
7	Other financial corporations	7A	0.00	7B	0.00	7C	0.00	7D	0.00	7E	0.00	7F	0.00
8	Of which: Investment firms	8A	0.00	8B	0.00	8C	0.00	8D	0.00	8E	0.00	8F	0.00
9	Loans and advances	9A	0.00	9B	0.00	9C	0.00	9D	0.00	9E	0.00	9F	0.00
10	Debt securities, including UoP	10A	0.00	10B	0.00	10C	0.00	10D	0.00	10E	0.00	10F	0.00
11	Equity instruments	11A	0.00	11B	0.00	11C	0.00			11E	0.00	11F	0.00
12	Of which: Management companies	12A	0.00	12B	0.00	12C	0.00	12D	0.00	12E	0.00	12F	0.00
13	Loans and advances	13A	0.00	13B	0.00	13C	0.00	13D	0.00	13E	0.00	13F	0.00

**GAR001- Turnover flow**

14	Debt securities, including UoP	14A	0.00	14B	0.00	14C	0.00	14D	0.00	14E	0.00	14F	0.00
15	Equity instruments	15A	0.00	15B	0.00	15C	0.00			15E	0.00	15F	0.00
16	Of which: Insurance undertakings	16A	0.00	16B	0.00	16C	0.00	16D	0.00	16E	0.00	16F	0.00
17	Loans and advances	17A	0.00	17B	0.00	17C	0.00	17D	0.00	17E	0.00	17F	0.00
18	Debt securities, including UoP	18A	0.00	18B	0.00	18C	0.00	18D	0.00	18E	0.00	18F	0.00
19	Equity instruments	19A	0.00	19B	0.00	19C	0.00			19E	0.00	19F	0.00
20	Non-financial undertakings	20A	243,403,713.78	20B	51,123,604.48	20C	19,762,989.83	20D	0.00	20E	72,157.43	20F	18,215,177.14
21	Loans and advances	21A	243,403,713.78	21B	51,123,604.48	21C	19,762,989.83	21D	0.00	21E	72,157.43	21F	18,215,177.14
22	Debt securities, including UoP	22A	0.00	22B	0.00	22C	0.00	22D	0.00	22E	0.00	22F	0.00
23	Equity instruments	23A	0.00	23B	0.00	23C	0.00			23E	0.00	23F	0.00
24	Households	24A	849,133,792.15	24B	849,133,792.15	24C	197,205,995.11	24D	197,205,995.11	24E	0.00	24F	0.00
25	Of which: loans collateralised by residential immovable property	25A	767,189,109.11	25B	767,189,109.11	25C	196,855,995.11	25D	196,855,995.11	25E	0.00	25F	0.00
26	Of which: building renovation loans	26A	60,863,014.10	26B	60,863,014.10	26C	350.000.00	26D	350.000.00	26E	0.00	26F	0.00
27	Of which: motor vehicle loans	27A	21,081,668.94	27B	21,081,668.94	27C	0.00	27D	0.00	27E	0.00	27F	0.00
28	Local governments financing	28A	0.00	28B	0.00	28C	0.00	28D	0.00	28E	0.00	28F	0.00
29	Housing financing	29A	0.00	29B	0.00	29C	0.00	29D	0.00	29E	0.00	29F	0.00
30	Local governments financing	30A	0.00	30B	0.00	30C	0.00	30D	0.00	30E	0.00	30F	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31A	1,420.009.94	31B	1,420.009.94	31C	0.00	31D	0.00	31E	0.00	31F	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32A	2,158,941,396.09	32B	0.00	32C	0.00	32D	0.00	32E	0.00	32F	0.00
33	Financial and Non-financial undertakings	33A	1,670,679,152.99										
34	SMEs and NFCs (other than SMEs) not	34A	1,667,481,579.70										



**GAR001- Turnover flow**

	subject to NFRD disclosure obligations												
35	Loans and advances	35A	1,667,481,579.70										
36	Of which: loans collateralised by commercial immovable property	36A	368,286,568.35										
37	Of which: building renovation loans	37A	531,413.09										
38	Debt securities	38A	0.00										
39	Equity instruments	39A	0.00										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	40A	3,197,573.30										
41	Loans and advances	41A	3,197,573.30										
42	Debt securities	42A	0.00										
43	Equity instruments	43A	0.00										
44	Derivatives	44A	0.00										
45	On demand interbank loans	45A	0.00										
46	Cash and cash-related assets	46A	466,204.45										
47	Other categories of assets (e.g. goodwill, commodities etc.)	47A	487,796,038.65										
48	Total GAR assets	48A	3,252,898,911.95	48B	901,677,406.57	48C	216,968,984.94	48D	197,205,995.11	48E	72,157.43	48F	18,215,177.14
49	Assets not covered for GAR calculation	49A	1,579,152,258.45										
50	Central government and Supranational issuers	50A	79,152,258.45										
51	Central banks exposure	51A	1,500.000.000.00										
52	Trading book	52A	0.00										
53	Total assets	53A	4,832,051,170.40	53B	901,677,406.57	53C	216,968,984.94	53D	197,205,995.11	53E	72,157.43	53F	18,215,177.14
	Off-balance sheet exposures - Undertakings not subject												

**GAR001- Turnover flow**

	to NFRD disclosure obligations												
54	Financial guarantees	55A	41,593,402.66	55B	0.00	55C	0.00	55D	0.00	55E	0.00	55F	0.00
55	Assets under management	56A	0.00	56B	0.00	56C	0.00	56D	0.00	56E	0.00	56F	0.00
56	Of which: debt securities	57A	0.00	57B	0.00	57C	0.00	57D	0.00	57E	0.00	57F	0.00
57	Of which: equity instruments	58A	0.00	58B	0.00	58C	0.00	58D	0.00	58E	0.00	58F	0.00

Disclosure reference date T									
Climate Change Adaptation (CCA)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
			Of which environmentally sustainable (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
			bq	br	bs	bt			
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1G	164,600.00	1H	5,000.00	1I	0.00	1J	5,000.00
2	Financial undertakings	2G	0.00	2H	0.00	2I	0.00	2J	0.00
3	Credit institutions	3G	0.00	3H	0.00	3I	0.00	3J	0.00
4	Loans and advances	4G	0.00	4H	0.00	4I	0.00	4J	0.00
5	UoP Debt securities, including	5G	0.00	5H	0.00	5I	0.00	5J	0.00
6	Equity instruments	6G	0.00	6H	0.00			6J	0.00
7	Other financial corporations	7G	0.00	7H	0.00	7I	0.00	7J	0.00
8	Of which: Investment firms	8G	0.00	8H	0.00	8I	0.00	8J	0.00
9	Loans and advances	9G	0.00	9H	0.00	9I	0.00	9J	0.00

**GAR001- Turnover flow**

10	UoP	Debt securities, including	10G	0.00	10H	0.00	10I	0.00	10J	0.00
11		Equity instruments	11G	0.00	11H	0.00			11J	0.00
12	companies	Of which: Management	12G	0.00	12H	0.00	12I	0.00	12J	0.00
13		Loans and advances	13G	0.00	13H	0.00	13I	0.00	13J	0.00
14	UoP	Debt securities, including	14G	0.00	14H	0.00	14I	0.00	14J	0.00
15		Equity instruments	15G	0.00	15H	0.00			15J	0.00
16	undertakings	Of which: Insurance	16G	0.00	16H	0.00	16I	0.00	16J	0.00
17		Loans and advances	17G	0.00	17H	0.00	17I	0.00	17J	0.00
18	UoP	Debt securities, including	18G	0.00	18H	0.00	18I	0.00	18J	0.00
19		Equity instruments	19G	0.00	19H	0.00			19J	0.00
20		Non-financial undertakings	20G	164,600.00	20H	5,000.00	20I	0.00	20J	5,000.00
21		Loans and advances	21G	164,600.00	21H	5,000.00	21I	0.00	21J	5,000.00
22	UoP	Debt securities, including	22G	0.00	22H	0.00	22I	0.00	22J	0.00
23		Equity instruments	23G	0.00	23H	0.00			23J	0.00
24	Households		24G	0.00	24H	0.00	24I	0.00	24J	0.00
25		Of which: loans collateralised by residential immovable property	25G	0.00	25H	0.00	25I	0.00	25J	0.00
26	loans	Of which: building renovation	26G	0.00	26H	0.00	26I	0.00	26J	0.00
27		Of which: motor vehicle loans	27G	0.00	27H	0.00	27I	0.00	27J	0.00
28		Local governments financing	28G	0.00	28H	0.00	28I	0.00	28J	0.00
29		Housing financing	29G	0.00	29H	0.00	29I	0.00	29J	0.00
30		Local governments financing	30G	0.00	30H	0.00	30I	0.00	30J	0.00
31		Collateral obtained by taking possession: residential and commercial immovable properties	31G	0.00	31H	0.00	31I	0.00	31J	0.00
32		Assets excluded from the numerator for GAR calculation (covered in the denominator)	32G	0.00	32H	0.00	32I	0.00	32J	0.00
33		Financial and Non-financial undertakings								

**GAR001- Turnover flow**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48G	164,600.00	48H	5,000.00	48I	0.00	48J	5,000.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53G	164,600.00	53H	5,000.00	53I	0.00	53J	5,000.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55G	0.00	55H	0.00	55I	0.00	55J	0.00
55	Assets under management	56G	0.00	56H	0.00	56I	0.00	56J	0.00
56	Of which: debt securities	57G	0.00	57H	0.00	57I	0.00	57J	0.00
57	Of which: equity instruments	58G	0.00	58H	0.00	58I	0.00	58J	0.00

**GAR001- Turnover flow**

Disclosure reference date T									
Water and Marine Resources (WTR)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		bu		bv		bw		bx	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1K	110,400.00	1L	0.00	1M	0.00	1N	0.00
2	Financial undertakings	2K	0.00	2L	0.00	2M	0.00	2N	0.00
3	Credit institutions	3K	0.00	3L	0.00	3M	0.00	3N	0.00
4	Loans and advances	4K	0.00	4L	0.00	4M	0.00	4N	0.00
5	UoP Debt securities, including	5K	0.00	5L	0.00	5M	0.00	5N	0.00
6	Equity instruments	6K	0.00	6L	0.00			6N	0.00
7	Other financial corporations	7K	0.00	7L	0.00	7M	0.00	7N	0.00
8	Of which: Investment firms	8K	0.00	8L	0.00	8M	0.00	8N	0.00
9	Loans and advances	9K	0.00	9L	0.00	9M	0.00	9N	0.00
10	UoP Debt securities, including	10K	0.00	10L	0.00	10M	0.00	10N	0.00
11	Equity instruments	11K	0.00	11L	0.00			11N	0.00
12	Of which: Management companies	12K	0.00	12L	0.00	12M	0.00	12N	0.00
13	Loans and advances	13K	0.00	13L	0.00	13M	0.00	13N	0.00
14	UoP Debt securities, including	14K	0.00	14L	0.00	14M	0.00	14N	0.00

**GAR001- Turnover flow**

15	Equity instruments	15K	0.00	15L	0.00			15N	0.00
16	Of which: Insurance undertakings	16K	0.00	16L	0.00	16M	0.00	16N	0.00
17	Loans and advances	17K	0.00	17L	0.00	17M	0.00	17N	0.00
18	Debt securities, including UoP	18K	0.00	18L	0.00	18M	0.00	18N	0.00
19	Equity instruments	19K	0.00	19L	0.00			19N	0.00
20	Non-financial undertakings	20K	110,400.00	20L	0.00	20M	0.00	20N	0.00
21	Loans and advances	21K	110,400.00	21L	0.00	21M	0.00	21N	0.00
22	Debt securities, including UoP	22K	0.00	22L	0.00	22M	0.00	22N	0.00
23	Equity instruments	23K	0.00	23L	0.00			23N	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28K	0.00	28L	0.00	28M	0.00	28N	0.00
29	Housing financing	29K	0.00	29L	0.00	29M	0.00	29N	0.00
30	Local governments financing	30K	0.00	30L	0.00	30M	0.00	30N	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31K	0.00	31L	0.00	31M	0.00	31N	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32K	0.00	32L	0.00	32M	0.00	32N	0.00
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								

**GAR001- Turnover flow**

39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure 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	48K	110,400.00	48L	0.00	48M	0.00	48N	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53K	110,400.00	53L	0.00	53M	0.00	53N	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55K	0.00	55L	0.00	55M	0.00	55N	0.00
55	Assets under management	56K	0.00	56L	0.00	56M	0.00	56N	0.00
56	Of which: debt securities	57K	0.00	57L	0.00	57M	0.00	57N	0.00
57	Of which: equity instruments	58K	0.00	58L	0.00	58M	0.00	58N	0.00

Disclosure reference date T

Circular Economy (CE)

**GAR001- Turnover flow**

EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		by		bz		ca		cb	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	10	417,600.00	1P	0.00	1Q	0.00	1R	0.00
2	Financial undertakings	20	0.00	2P	0.00	2Q	0.00	2R	0.00
3	Credit institutions	30	0.00	3P	0.00	3Q	0.00	3R	0.00
4	Loans and advances	40	0.00	4P	0.00	4Q	0.00	4R	0.00
5	Debt securities, including UoP	50	0.00	5P	0.00	5Q	0.00	5R	0.00
6	Equity instruments	60	0.00	6P	0.00			6R	0.00
7	Other financial corporations	70	0.00	7P	0.00	7Q	0.00	7R	0.00
8	Of which: Investment firms	80	0.00	8P	0.00	8Q	0.00	8R	0.00
9	Loans and advances	90	0.00	9P	0.00	9Q	0.00	9R	0.00
10	Debt securities, including UoP	100	0.00	10P	0.00	10Q	0.00	10R	0.00
11	Equity instruments	110	0.00	11P	0.00			11R	0.00
12	Of which: Management companies	120	0.00	12P	0.00	12Q	0.00	12R	0.00
13	Loans and advances	130	0.00	13P	0.00	13Q	0.00	13R	0.00
14	Debt securities, including UoP	140	0.00	14P	0.00	14Q	0.00	14R	0.00
15	Equity instruments	150	0.00	15P	0.00			15R	0.00
16	Of which: Insurance undertakings	160	0.00	16P	0.00	16Q	0.00	16R	0.00
17	Loans and advances	170	0.00	17P	0.00	17Q	0.00	17R	0.00
18	Debt securities, including UoP	180	0.00	18P	0.00	18Q	0.00	18R	0.00
19	Equity instruments	190	0.00	19P	0.00			19R	0.00
20	Non-financial undertakings	200	417,600.00	20P	0.00	20Q	0.00	20R	0.00



**GAR001- Turnover flow**

21	Loans and advances	210	417,600.00	21P	0.00	21Q	0.00	21R	0.00
22	Debt securities, including	220	0.00	22P	0.00	22Q	0.00	22R	0.00
	UoP								
23	Equity instruments	230	0.00	23P	0.00			23R	0.00
24	Households	240	0.00	24P	0.00	24Q	0.00	24R	0.00
25	Of which: loans collateralised by residential immovable property	250	0.00	25P	0.00	25Q	0.00	25R	0.00
26	Of which: building renovation loans	260	0.00	26P	0.00	26Q	0.00	26R	0.00
27	Of which: motor vehicle loans	270	0.00	27P	0.00	27Q	0.00	27R	0.00
28	Local governments financing	280	0.00	28P	0.00	28Q	0.00	28R	0.00
29	Housing financing	290	0.00	29P	0.00	29Q	0.00	29R	0.00
30	Local governments financing	300	0.00	30P	0.00	30Q	0.00	30R	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	310	0.00	31P	0.00	31Q	0.00	31R	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	320	0.00	32P	0.00	32Q	0.00	32R	0.00
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	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								

**GAR001- Turnover flow**

46	Cash and cash-related assets								
47	Other categories of assets (e.g. goodwill, commodities etc.)								
48	Total GAR assets	48O	417,600.00	48P	0.00	48Q	0.00	48R	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53O	417,600.00	53P	0.00	53Q	0.00	53R	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55O	0.00	55P	0.00	55Q	0.00	55R	0.00
55	Assets under management	56O	0.00	56P	0.00	56Q	0.00	56R	0.00
56	Of which: debt securities	57O	0.00	57P	0.00	57Q	0.00	57R	0.00
57	Of which: equity instruments	58O	0.00	58P	0.00	58Q	0.00	58R	0.00

Disclosure reference date T									
Pollution Prevention and Control (PPC)									
EUR m	Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
		Of which environmentally sustainable (Taxonomy-aligned)							
			Of which: use of proceeds				Of which: enabling		
		cc	cd		ce		cf		
	GAR - Covered assets in both numerator and denominator								

**GAR001- Turnover flow**

1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1S	0.00	1T	0.00	1U	0.00	1V	0.00
2	Financial undertakings	2S	0.00	2T	0.00	2U	0.00	2V	0.00
3	Credit institutions	3S	0.00	3T	0.00	3U	0.00	3V	0.00
4	Loans and advances	4S	0.00	4T	0.00	4U	0.00	4V	0.00
5	UoP Debt securities, including	5S	0.00	5T	0.00	5U	0.00	5V	0.00
6	Equity instruments	6S	0.00	6T	0.00			6V	0.00
7	Other financial corporations	7S	0.00	7T	0.00	7U	0.00	7V	0.00
8	Of which: Investment firms	8S	0.00	8T	0.00	8U	0.00	8V	0.00
9	Loans and advances	9S	0.00	9T	0.00	9U	0.00	9V	0.00
10	UoP Debt securities, including	10S	0.00	10T	0.00	10U	0.00	10V	0.00
11	Equity instruments	11S	0.00	11T	0.00			11V	0.00
12	Of which: Management companies	12S	0.00	12T	0.00	12U	0.00	12V	0.00
13	Loans and advances	13S	0.00	13T	0.00	13U	0.00	13V	0.00
14	UoP Debt securities, including	14S	0.00	14T	0.00	14U	0.00	14V	0.00
15	Equity instruments	15S	0.00	15T	0.00			15V	0.00
16	Of which: Insurance undertakings	16S	0.00	16T	0.00	16U	0.00	16V	0.00
17	Loans and advances	17S	0.00	17T	0.00	17U	0.00	17V	0.00
18	UoP Debt securities, including	18S	0.00	18T	0.00	18U	0.00	18V	0.00
19	Equity instruments	19S	0.00	19T	0.00			19V	0.00
20	Non-financial undertakings	20S	0.00	20T	0.00	20U	0.00	20V	0.00
21	Loans and advances	21S	0.00	21T	0.00	21U	0.00	21V	0.00
22	UoP Debt securities, including	22S	0.00	22T	0.00	22U	0.00	22V	0.00
23	Equity instruments	23S	0.00	23T	0.00			23V	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								

**GAR001- Turnover flow**

27	Of which: motor vehicle loans								
28	Local governments financing	28S	0.00	28T	0.00	28U	0.00	28V	0.00
29	Housing financing	29S	0.00	29T	0.00	29U	0.00	29V	0.00
30	Local governments financing	30S	0.00	30T	0.00	30U	0.00	30V	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31S	0.00	31T	0.00	31U	0.00	31V	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32S	0.00	32T	0.00	32U	0.00	32V	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48S	0.00	48T	0.00	48U	0.00	48V	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								

**GAR001- Turnover flow**

52	Trading book								
53	Total assets	53S	0.00	53T	0.00	53U	0.00	53V	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55S	0.00	55T	0.00	55U	0.00	55V	0.00
55	Assets under management	56S	0.00	56T	0.00	56U	0.00	56V	0.00
56	Of which: debt securities	57S	0.00	57T	0.00	57U	0.00	57V	0.00
57	Of which: equity instruments	58S	0.00	58T	0.00	58U	0.00	58V	0.00

Disclosure reference date T									
Biodiversity and ecosystems (BIO)									
EUR m		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		cg		ch		ci		cj	
	GAR - Covered assets in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1W	0.00	1X	0.00	1Y	0.00	1Z	0.00
2	Financial undertakings	2W	0.00	2X	0.00	2Y	0.00	2Z	0.00
3	Credit institutions	3W	0.00	3X	0.00	3Y	0.00	3Z	0.00
4	Loans and advances	4W	0.00	4X	0.00	4Y	0.00	4Z	0.00
5	Debt securities, including UoP	5W	0.00	5X	0.00	5Y	0.00	5Z	0.00
6	Equity instruments	6W	0.00	6X	0.00			6Z	0.00

**GAR001- Turnover flow**

7	Other financial corporations	7W	0.00	7X	0.00	7Y	0.00	7Z	0.00
8	Of which: Investment firms	8W	0.00	8X	0.00	8Y	0.00	8Z	0.00
9	Loans and advances	9W	0.00	9X	0.00	9Y	0.00	9Z	0.00
10	UoP Debt securities, including	10W	0.00	10X	0.00	10Y	0.00	10Z	0.00
11	Equity instruments	11W	0.00	11X	0.00			11Z	0.00
12	Of which: Management companies	12W	0.00	12X	0.00	12Y	0.00	12Z	0.00
13	Loans and advances	13W	0.00	13X	0.00	13Y	0.00	13Z	0.00
14	UoP Debt securities, including	14W	0.00	14X	0.00	14Y	0.00	14Z	0.00
15	Equity instruments	15W	0.00	15X	0.00			15Z	0.00
16	Of which: Insurance undertakings	16W	0.00	16X	0.00	16Y	0.00	16Z	0.00
17	Loans and advances	17W	0.00	17X	0.00	17Y	0.00	17Z	0.00
18	UoP Debt securities, including	18W	0.00	18X	0.00	18Y	0.00	18Z	0.00
19	Equity instruments	19W	0.00	19X	0.00			19Z	0.00
20	Non-financial undertakings	20W	0.00	20X	0.00	20Y	0.00	20Z	0.00
21	Loans and advances	21W	0.00	21X	0.00	21Y	0.00	21Z	0.00
22	UoP Debt securities, including	22W	0.00	22X	0.00	22Y	0.00	22Z	0.00
23	Equity instruments	23W	0.00	23X	0.00			23Z	0.00
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28W	0.00	28X	0.00	28Y	0.00	28Z	0.00
29	Housing financing	29W	0.00	29X	0.00	29Y	0.00	29Z	0.00
30	Local governments financing	30W	0.00	30X	0.00	30Y	0.00	30Z	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31W	0.00	31X	0.00	31Y	0.00	31Z	0.00

**GAR001- Turnover flow**

32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32W	0.00	32X	0.00	32Y	0.00	32Z	0.00
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	Non-EU country counterparties not subject to NFRD disclosure 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	48W	0.00	48X	0.00	48Y	0.00	48Z	0.00
49	Assets not covered for GAR calculation								
50	Central government and Supranational issuers								
51	Central banks exposure								
52	Trading book								
53	Total assets	53W	0.00	53X	0.00	53Y	0.00	53Z	0.00
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations								
54	Financial guarantees	55W	0.00	55X	0.00	55Y	0.00	55Z	0.00
55	Assets under management	56W	0.00	56X	0.00	56Y	0.00	56Z	0.00

**GAR001- Turnover flow**

56	Of which: debt securities	57W	0.00	57X	0.00	57Y	0.00	57Z	0.00
57	Of which: equity instruments	58W	0.00	58X	0.00	58Y	0.00	58Z	0.00

Disclosure reference date T											
TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
EUR m		Of which environmentally sustainable (Taxonomy-aligned)									
						Of which: use of proceeds		Of which: transitional		Of which: enabling	
		ck		cl		cm		cn		co	
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AA	900,949,996.63	1AB	216,973,984.94	1AC	197,205,995.11	1AD	72,157.43	1AE	18,220,177.14
2	Financial undertakings	2AA	0.00	2AB	0.00	2AC	0.00	2AD	0.00	2AE	0.00
3	Credit institutions	3AA	0.00	3AB	0.00	3AC	0.00	3AD	0.00	3AE	0.00
4	Loans and advances	4AA	0.00	4AB	0.00	4AC	0.00	4AD	0.00	4AE	0.00
5	Debt securities, including UoP	5AA	0.00	5AB	0.00	5AC	0.00	5AD	0.00	5AE	0.00
6	Equity instruments	6AA	0.00	6AB	0.00			6AD	0.00	6AE	0.00
7	Other financial corporations	7AA	0.00	7AB	0.00	7AC	0.00	7AD	0.00	7AE	0.00
8	Of which: Investment firms	8AA	0.00	8AB	0.00	8AC	0.00	8AD	0.00	8AE	0.00
9	Loans and advances	9AA	0.00	9AB	0.00	9AC	0.00	9AD	0.00	9AE	0.00
10	Debt securities, including UoP	10AA	0.00	10AB	0.00	10AC	0.00	10AD	0.00	10AE	0.00



**GAR001- Turnover flow**

11	Equity instruments	11AA	0.00	11AB	0.00			11AD	0.00	11AE	0.00
12	Of which: Management companies	12AA	0.00	12AB	0.00	12AC	0.00	12AD	0.00	12AE	0.00
13	Loans and advances	13AA	0.00	13AB	0.00	13AC	0.00	13AD	0.00	13AE	0.00
14	Debt securities, including UoP	14AA	0.00	14AB	0.00	14AC	0.00	14AD	0.00	14AE	0.00
15	Equity instruments	15AA	0.00	15AB	0.00			15AD	0.00	15AE	0.00
16	Of which: Insurance undertakings	16AA	0.00	16AB	0.00	16AC	0.00	16AD	0.00	16AE	0.00
17	Loans and advances	17AA	0.00	17AB	0.00	17AC	0.00	17AD	0.00	17AE	0.00
18	Debt securities, including UoP	18AA	0.00	18AB	0.00	18AC	0.00	18AD	0.00	18AE	0.00
19	Equity instruments	19AA	0.00	19AB	0.00			19AD	0.00	19AE	0.00
20	Non-financial undertakings	20AA	51,816,204.48	20AB	19,767,989.83	20AC	0.00	20AD	72,157.43	20AE	18,220,177.14
21	Loans and advances	21AA	51,816,204.48	21AB	19,767,989.83	21AC	0.00	21AD	72,157.43	21AE	18,220,177.14
22	Debt securities, including UoP	22AA	0.00	22AB	0.00	22AC	0.00	22AD	0.00	22AE	0.00
23	Equity instruments	23AA	0.00	23AB	0.00			23AD	0.00	23AE	0.00
24	Households	24AA	849,133,792.15	24AB	197,205,995.11	24AC	197,205,995.11	24AD	0.00	24AE	0.00
25	Of which: loans collateralised by residential immovable property	25AA	767,189,109.11	25AB	196,855,995.11	25AC	196,855,995.11	25AD	0.00	25AE	0.00
26	Of which: building renovation loans	26AA	60,863,014.10	26AB	350.000.00	26AC	350.000.00	26AD	0.00	26AE	0.00
27	Of which: motor vehicle loans	27AA	21,081,668.94	27AB	0.00	27AC	0.00	27AD	0.00	27AE	0.00
28	Local governments financing	28AA	0.00	28AB	0.00	28AC	0.00	28AD	0.00	28AE	0.00
29	Housing financing	29AA	0.00	29AB	0.00	29AC	0.00	29AD	0.00	29AE	0.00
30	Local governments financing	30AA	0.00	30AB	0.00	30AC	0.00	30AD	0.00	30AE	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AA	1,420.009.94	31AB	0.00	31AC	0.00	31AD	0.00	31AE	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	32AA	0.00	32AB	0.00	32AC	0.00	32AD	0.00	32AE	0.00

**GAR001- Turnover flow**

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	Non-EU country counterparties not subject to NFRD disclosure 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	48AA	902,370.006.57	48AB	216,973,984.94	48AC	197,205,995.11	48AD	72,157.43	48AE	18,220,177.14
49	Assets not covered for GAR calculation										
50	Central government and Supranational issuers										
51	Central banks exposure										
52	Trading book										
53	Total assets	53AA	902,370.006.57	53AB	216,973,984.94	53AC	197,205,995.11	53AD	72,157.43	53AE	18,220,177.14
	Off-balance sheet exposures - Undertakings not subject to NFRD disclosure obligations										
54	Financial guarantees	55AA	0.00	55AB	0.00	55AC	0.00	55AD	0.00	55AE	0.00

**GAR002- Capex**

55	Assets under management	56AA	0.00	56AB	0.00	56AC	0.00	56AD	0.00	56AE	0.00
56	Of which: debt securities	57AA	0.00	57AB	0.00	57AC	0.00	57AD	0.00	57AE	0.00
57	Of which: equity instruments	58AA	0.00	58AB	0.00	58AC	0.00	58AD	0.00	58AE	0.00

**GAR002 – Capex**

	Climate Change Mitigation (CCM)									
	Breakdown by sector - NACE 4 digits level (code and label)		Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
			Gross carrying amount				Gross carrying amount			
			EUR m		Of which environmentally sustainable (CCM)		EUR m		Of which environmentally sustainable (CCM)	
			a		b		c		d	
1	1A	1039 - Other processing and preserving of fruit and vegetables	1B	11,089,678.56	1C	0.00				
2	1A	1041 - Manufacture of oils and fats	1B	264,294.16	1C	0.00				
3	1A	1085 - Manufacture of prepared meals and dishes	1B	615,917.93	1C	0.00				
4	1A	1089 - Manufacture of other food products n,e,c,	1B	702,575.04	1C	0.00				
5	1A	1105 - Manufacture of beer	1B		1C	0.00				
6	1A	1107 - Manufacture of soft drinks; production of mineral waters and other bottled waters	1B	121,535.12	1C	28,742.10				
7	1A	1419 - Manufacture of other wearing apparel and accessories	1B	429,652.29	1C	8,791.91				

**GAR002- Capex**

8	1A	1711 - Manufacture of pulp	1B	249,937.83	1C	227,915.20			
9	1A	2011 - Manufacture of industrial gases	1B	312,002.59	1C	137,109.98			
10	1A	2014 - Manufacture of other organic basic chemicals	1B	242,929.24	1C	20,931.77			
11	1A	2110 - Manufacture of basic pharmaceutical products	1B	119,172.30	1C	62.40			
12	1A	2211 - Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	1B	396,816.68	1C	146,581.72			
13	1A	2311 - Manufacture of flat glass	1B	568,802.70	1C	522,887.00			
14	1A	2410 - Manufacture of basic iron and steel and of ferro-alloys	1B	2,874,431.81	1C	0.00			
15	1A	2420 - Manufacture of tubes. pipes. hollow profiles and related fittings. of steel	1B	2,625,180.96	1C	2,625,180.96			
16	1A	2511 - Manufacture of metal structures and parts of structures	1B	-5,259.44	1C	0.00			
17	1A	2611 - Manufacture of electronic components	1B	1,313,592.37	1C	0.00			
18	1A	2630 - Manufacture of communication equipment	1B	32,753.54	1C	3,408.36			
19	1A	2711 - Manufacture of electric motors. generators and transformers	1B	1,380,211.65	1C	663,403.21			
20	1A	2829 - Manufacture of other general-purpose machinery n,e,c,	1B	0.27	1C	0.00			
21	1A	2910 - Manufacture of motor vehicles	1B	5,101,012.27	1C	1,356,282.38			
22	1A	3020 - Manufacture of railway	1B	19,462,779.18	1C	14,902,985.66			

**GAR002- Capex**

		locomotives and rolling stock							
23	1A	3030 - Manufacture of air and spacecraft and related machinery	1B	626,514.43	1C	0.00			
24	1A	3250 - Manufacture of medical and dental instruments and supplies	1B	2,135,518.97	1C	26,986.00			
25	1A	3511 - Production of electricity	1B	7,836,343.50	1C	7,491,937.58			
26	1A	3512 - Transmission of electricity	1B	995,797.67	1C	994,995.74			
27	1A	3513 - Distribution of electricity	1B	22,357,557.71	1C	21,633,087.76			
28	1A	3521 - Manufacture of gas	1B	2,338,129.40	1C	1,510,579.33			
29	1A	3522 - Distribution of gaseous fuels through mains	1B	2,429,085.62	1C	2,212,984.54			
30	1A	3811 - Collection of non-hazardous waste	1B	12,634.53	1C	0.00			
31	1A	4110 - Development of building projects	1B	3,749,221.85	1C	688,860.00			
32	1A	4120 - Construction of residential and non-residential buildings	1B	531,758.07	1C	353,861.12			
33	1A	4299 - Construction of other civil engineering projects n,e,c,	1B	3,329,077.00	1C	1,026,023.73			
34	1A	4311 - Demolition	1B	143,175.57	1C	0.00			
35	1A	4621 - Wholesale of grain. unmanufactured tobacco. seeds and animal feeds	1B	54.35	1C	0.00			
36	1A	4671 - Wholesale of solid. liquid and gaseous fuels and related products	1B	265,245.06	1C	0.00			
37	1A	4711 - Non-specialised retail sale of predominately food.	1B	297,608.00	1C	0.00			

**GAR002- Capex**

		beverages or tobacco							
38	1A	4719 - Other retail sale in non-specialised stores	1B	195,391.84	1C	13,814.78			
39	1A	5010 - Sea and coastal passenger water transport	1B	2,950,143.77	1C	691,774.24			
40	1A	5221 - Service activities incidental to land transportation	1B	180,830.52	1C	0.00			
41	1A	5320 - Other postal and courier activities	1B	491,659.27	1C	161,137.92			
42	1A	6820 - Renting and operating of own or leased real estate	1B	762,089.30	1C	79,380.96			
43	1A	9999 - NACEs not included in Taxonomy	1B	5,822,958.46	1C	2,121,331.57			
44	1A	TOTAL	1B	105,525,052.09	1C	59,651,037.91			

Climate Change Adaptation (CCA)								
Non-Financial corporates (Subject to NFRD)					SMEs and other NFCs not subject to NFRD			
Gross carrying amount					Gross carrying amount			
EUR m		Of which environmentally sustainable (CCA)			EUR m		Of which environmentally sustainable (CCA)	
e		f			g		h	
1	1F	0.00	1G	0.00				
2	1F	0.00	1G	0.00				
3	1F	0.00	1G	0.00				
4	1F	0.00	1G	0.00				
5	1F	0.00	1G	0.00				
6	1F	3,283.37	1G	0.00				

**GAR002- Capex**

7	1F	0.00	1G	0.00				
8	1F	0.00	1G	0.00				
9	1F	1,399.91	1G	0.00				
10	1F	0.00	1G	0.00				
11	1F	0.00	1G	0.00				
12	1F	0.00	1G	0.00				
13	1F	0.00	1G	0.00				
14	1F	0.00	1G	0.00				
15	1F	0.00	1G	0.00				
16	1F	0.00	1G	0.00				
17	1F	0.00	1G	0.00				
18	1F	0.00	1G	0.00				
19	1F	0.00	1G	0.00				
20	1F	0.00	1G	0.00				
21	1F	0.00	1G	0.00				
22	1F	0.00	1G	0.00				
23	1F	0.00	1G	0.00				
24	1F	0.00	1G	0.00				
25	1F	0.00	1G	0.00				
26	1F	0.00	1G	0.00				
27	1F	0.00	1G	0.00				
28	1F	0.00	1G	0.00				
29	1F	0.00	1G	0.00				
30	1F	0.00	1G	0.00				
31	1F	6,078.18	1G	0.00				
32	1F	338,799.57	1G	10,587.49				
33	1F	0.00	1G	0.00				
34	1F	0.00	1G	0.00				

**GAR002- Capex**

35	1F	0.00	1G	0.00				
36	1F	0.00	1G	0.00				
37	1F	0.00	1G	0.00				
38	1F	0.00	1G	0.00				
39	1F	0.00	1G	0.00				
40	1F	0.00	1G	0.00				
41	1F	0.00	1G	0.00				
42	1F	0.00	1G	0.00				
43	1F	0.00	1G	0.00				
44	1F	349,561.02	1G	10,587.49				

	Water and Marine Resources (WTR)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (WTR)		EUR m		Of which environmentally sustainable (WTR)	
	i		j		k		l	
1	1J	0.00	1K	0.00				
2	1J	0.00	1K	0.00				
3	1J	0.00	1K	0.00				
4	1J	0.00	1K	0.00				
5	1J	0.00	1K	0.00				
6	1J	0.00	1K	0.00				
7	1J	0.00	1K	0.00				
8	1J	0.00	1K	0.00				
9	1J	0.00	1K	0.00				
10	1J	0.00	1K	0.00				



**GAR002- Capex**

11	1J	0.00	1K	0.00			
12	1J	0.00	1K	0.00			
13	1J	0.00	1K	0.00			
14	1J	0.00	1K	0.00			
15	1J	0.00	1K	0.00			
16	1J	0.00	1K	0.00			
17	1J	0.00	1K	0.00			
18	1J	0.00	1K	0.00			
19	1J	7,384.59	1K	0.00			
20	1J	0.00	1K	0.00			
21	1J	0.00	1K	0.00			
22	1J	0.00	1K	0.00			
23	1J	0.00	1K	0.00			
24	1J	0.00	1K	0.00			
25	1J	1,364,523.27	1K	1,178,002.78			
26	1J	0.00	1K	0.00			
27	1J	0.00	1K	0.00			
28	1J	0.00	1K	0.00			
29	1J	0.00	1K	0.00			
30	1J	0.00	1K	0.00			
31	1J	213,242.69	1K	0.00			
32	1J	0.00	1K	0.00			
33	1J	0.00	1K	0.00			
34	1J	0.00	1K	0.00			
35	1J	0.00	1K	0.00			
36	1J	0.00	1K	0.00			
37	1J	0.00	1K	0.00			
38	1J	158.79	1K	0.00			

**GAR002- Capex**

39	1J	0.00	1K	0.00				
40	1J	0.00	1K	0.00				
41	1J	0.00	1K	0.00				
42	1J	0.00	1K	0.00				
43	1J	104,930.05	1K	0.00				
44	1J	1,690,239.39	1K	1,178,002.78				

	Circular Economy (CE)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (CE)		EUR m		Of which environmentally sustainable (CE)	
	m		n		o		p	
1	1N	0.00	1O	0.00				
2	1N	0.00	1O	0.00				
3	1N	0.00	1O	0.00				
4	1N	0.00	1O	0.00				
5	1N	0.00	1O	0.00				
6	1N	2,727.72	1O	0.00				
7	1N	0.00	1O	0.00				
8	1N	71,573.54	1O	0.00				
9	1N	0.00	1O	0.00				
10	1N	0.00	1O	0.00				
11	1N	26.43	1O	0.00				

**GAR002- Capex**

12	1N	5,841.53	10	0.00			
13	1N	0.00	10	0.00			
14	1N	0.00	10	0.00			
15	1N	539,982.51	10	0.00			
16	1N	0.00	10	0.00			
17	1N	0.00	10	0.00			
18	1N	504,022.04	10	0.00			
19	1N	334,306.48	10	20,153.77			
20	1N	0.00	10	0.00			
21	1N	0.00	10	0.00			
22	1N	0.00	10	0.00			
23	1N	0.00	10	0.00			
24	1N	0.00	10	0.00			
25	1N	1,482.28	10	247.05			
26	1N	0.00	10	0.00			
27	1N	0.00	10	0.00			
28	1N	0.00	10	0.00			
29	1N	0.00	10	0.00			
30	1N	0.00	10	0.00			
31	1N	0.00	10	0.00			
32	1N	0.00	10	0.00			
33	1N	0.00	10	0.00			
34	1N	0.00	10	0.00			
35	1N	0.00	10	0.00			
36	1N	0.00	10	0.00			
37	1N	0.00	10	0.00			
38	1N	0.00	10	0.00			
39	1N	0.00	10	0.00			

**GAR002- Capex**

40	1N	0.00	1O	0.00			
41	1N	0.00	1O	0.00			
42	1N	0.00	1O	0.00			
43	1N	28,571.77	1O	0.00			
44	1N	1,488,534.30	1O	20,400.82			

	Pollution Prevention and Control (PPC)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (PPC)		EUR m		Of which environmentally sustainable (PPC)	
	q		r		s		t	
1	1R	0.00	1S	0.00				
2	1R	0.00	1S	0.00				
3	1R	0.00	1S	0.00				
4	1R	0.00	1S	0.00				
5	1R	0.00	1S	0.00				
6	1R	0.00	1S	0.00				
7	1R	0.00	1S	0.00				
8	1R	0.00	1S	0.00				
9	1R	0.00	1S	0.00				
10	1R	12,076.02	1S	0.00				
11	1R	790,835.72	1S	0.00				

**GAR002- Capex**

12	1R	0.00	1S	0.00			
13	1R	0.00	1S	0.00			
14	1R	0.00	1S	0.00			
15	1R	0.00	1S	0.00			
16	1R	0.00	1S	0.00			
17	1R	0.00	1S	0.00			
18	1R	0.00	1S	0.00			
19	1R	0.00	1S	0.00			
20	1R	0.00	1S	0.00			
21	1R	0.00	1S	0.00			
22	1R	0.00	1S	0.00			
23	1R	0.00	1S	0.00			
24	1R	0.00	1S	0.00			
25	1R	0.00	1S	0.00			
26	1R	0.00	1S	0.00			
27	1R	0.00	1S	0.00			
28	1R	0.00	1S	0.00			
29	1R	0.00	1S	0.00			
30	1R	0.00	1S	0.00			
31	1R	0.00	1S	0.00			
32	1R	0.00	1S	0.00			
33	1R	0.00	1S	0.00			
34	1R	0.00	1S	0.00			
35	1R	0.00	1S	0.00			
36	1R	0.00	1S	0.00			
37	1R	0.00	1S	0.00			
38	1R	0.00	1S	0.00			
39	1R	0.00	1S	0.00			

**GAR002- Capex**

40	1R	0.00	1S	0.00			
41	1R	0.00	1S	0.00			
42	1R	0.00	1S	0.00			
43	1R	4,492.44	1S	0.00			
44	1R	807,404.18	1S	0.00			

	Biodiversity and ecosystems (BIO)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (BIO)		EUR m		Of which environmentally sustainable (BIO)	
	u		v		w		x	
1	1V	0.00	1W	0.00				
2	1V	26,487.00	1W	0.00				
3	1V	0.00	1W	0.00				
4	1V	0.00	1W	0.00				
5	1V	0.00	1W	0.00				
6	1V	0.00	1W	0.00				
7	1V	0.00	1W	0.00				
8	1V	427.16	1W	0.00				
9	1V	0.00	1W	0.00				
10	1V	0.00	1W	0.00				
11	1V	0.00	1W	0.00				

**GAR002- Capex**

12	1V	0.00	1W	0.00			
13	1V	0.00	1W	0.00			
14	1V	0.00	1W	0.00			
15	1V	0.00	1W	0.00			
16	1V	0.00	1W	0.00			
17	1V	0.00	1W	0.00			
18	1V	0.00	1W	0.00			
19	1V	0.00	1W	0.00			
20	1V	0.00	1W	0.00			
21	1V	0.00	1W	0.00			
22	1V	0.00	1W	0.00			
23	1V	0.00	1W	0.00			
24	1V	0.00	1W	0.00			
25	1V	0.00	1W	0.00			
26	1V	0.00	1W	0.00			
27	1V	0.00	1W	0.00			
28	1V	0.00	1W	0.00			
29	1V	0.00	1W	0.00			
30	1V	0.00	1W	0.00			
31	1V	0.00	1W	0.00			
32	1V	0.00	1W	0.00			
33	1V	0.00	1W	0.00			
34	1V	0.00	1W	0.00			
35	1V	0.00	1W	0.00			
36	1V	0.00	1W	0.00			
37	1V	0.00	1W	0.00			
38	1V	0.00	1W	0.00			
39	1V	0.00	1W	0.00			

**GAR002- Capex**

40	1V	0.00	1W	0.00				
41	1V	0.00	1W	0.00				
42	1V	0.00	1W	0.00				
43	1V	0.00	1W	0.00				
44	1V	26,914.16	1W	0.00				

	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		EUR m		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
	y		z		aa		ab	
1	Z	11,089,678.56	AA	0.00				
2	Z	290,781.16	AA	0.00				
3	Z	615,917.93	AA	0.00				
4	Z	702,575.04	AA	0.00				
5	Z	176,240.16	AA	0.00				
6	Z	127,546.21	AA	28,742.10				
7	Z	429,652.29	AA	8,791.91				
8	Z	321,938.52	AA	227,915.20				
9	Z	313,402.49	AA	137,109.98				
10	Z	255,005.26	AA	20,931.77				
11	Z	910,034.45	AA	62.40				



**GAR002- Capex**

12	Z	402,658.21	AA	146,581.72			
13	Z	568,802.70	AA	522,887.00			
14	Z	2,874,431.81	AA	0.00			
15	Z	3,165,163.46	AA	2,625,180.96			
16	Z	-5,259.44	AA	0.00			
17	Z	1,313,592.37	AA	0.00			
18	Z	536,775.58	AA	3,408.36			
19	Z	1,721,902.72	AA	683,556.99			
20	Z	0.27	AA	0.00			
21	Z	5,101,012.27	AA	1,356,282.38			
22	Z	19,462,779.18	AA	14,902,985.66			
23	Z	626,514.43	AA	0.00			
24	Z	2,135,518.97	AA	26,986.00			
25	Z	9,202,349.05	AA	8,670,187.40			
26	Z	995,797.67	AA	994,995.74			
27	Z	22,357,557.71	AA	21,633,087.76			
28	Z	2,338,129.40	AA	1,510,579.33			
29	Z	2,429,085.62	AA	2,212,984.54			
30	Z	12,634.53	AA	0.00			
31	Z	3,968,542.71	AA	688,860.00			
32	Z	870,557.65	AA	364,448.60			
33	Z	3,329,077.00	AA	1,026,023.73			
34	Z	143,175.57	AA	0.00			
35	Z	54.35	AA	0.00			
36	Z	265,245.06	AA	0.00			
37	Z	297,608.00	AA	0.00			
38	Z	195,550.63	AA	13,814.78			
39	Z	2,950,143.77	AA	691,774.24			

**GAR002- Turnover**

40	Z	180,830.52	AA	0.00			
41	Z	491,659.27	AA	161,137.92			
42	Z	762,089.30	AA	79,380.96			
43	Z	5,960,952.72	AA	2,121,331.57			
44	Z	109,887,705.13	AA	60,860,029.00			

**GAR002 – Turnover**

	Climate Change Mitigation (CCM)									
	Breakdown by sector - NACE 4 digits level (code and label)		Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
			Gross carrying amount				Gross carrying amount			
			EUR m		Of which environmentally sustainable (CCM)		EUR m		Of which environmentally sustainable (CCM)	
			a		b		c		d	
1	1A	1039 - Other processing and preserving of fruit and vegetables	1B	11,089,678.56	1C	0.00				
2	1A	1085 - Manufacture of prepared meals and dishes	1B	615,917.93	1C	0.00				
3	1A	1089 - Manufacture of other food products n,e,c,	1B	702,575.04	1C	0.00				
4	1A	1711 - Manufacture of pulp	1B	116,568.04	1C	114,622.08				
5	1A	2011 - Manufacture of industrial gases	1B	235,322.14	1C	18,032.30				
6	1A	2014 - Manufacture of other organic basic chemicals	1B	164,233.85	1C	45,687.60				

**GAR002- Turnover**

7	1A	2211 - Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	1B	356,197.65	1C	108,611.76				
8	1A	2311 - Manufacture of flat glass	1B	435,571.90	1C	404,208.71				
9	1A	2410 - Manufacture of basic iron and steel and of ferro-alloys	1B	3,562,602.96	1C	0.00				
10	1A	2420 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	1B	3,845,331.25	1C	3,656,364.29				
11	1A	2511 - Manufacture of metal structures and parts of structures	1B	-5,259.44	1C	0.00				
12	1A	2611 - Manufacture of electronic components	1B	1,069,788.73	1C	0.00				
13	1A	2711 - Manufacture of electric motors, generators and transformers	1B	937,457.44	1C	615,973.53				
14	1A	2910 - Manufacture of motor vehicles	1B	4,808,872.31	1C	685,050.91				
15	1A	3020 - Manufacture of railway locomotives and rolling stock	1B	19,523,253.90	1C	16,170,938.85				
16	1A	3030 - Manufacture of air and spacecraft and related machinery	1B	754,323.70	1C	0.00				
17	1A	3511 - Production of electricity	1B	3,575,831.14	1C	3,181,473.02				
18	1A	3512 - Transmission of electricity	1B	891,947.62	1C	846,839.01				
19	1A	3513 - Distribution of electricity	1B	6,596,873.36	1C	4,434,720.90				
20	1A	3521 - Manufacture of gas	1B	1,066,884.29	1C	933,247.41				
21	1A	3522 - Distribution of gaseous fuels through mains	1B	1,084,335.07	1C	1,084,335.07				

**GAR002- Turnover**

22	1A	3811 - Collection of non-hazardous waste	1B	12,634.53	1C	0.00				
23	1A	4110 - Development of building projects	1B	4,411,236.57	1C	1,704,928.50				
24	1A	4120 - Construction of residential and non-residential buildings	1B	1,500,456.33	1C	393,317.78				
25	1A	4299 - Construction of other civil engineering projects n,e,c,	1B	6,716,155.34	1C	1,235,028.57				
26	1A	4311 - Demolition	1B	143,175.57	1C	0.00				
27	1A	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	1B	54.35	1C	0.00				
28	1A	4671 - Wholesale of solid, liquid and gaseous fuels and related products	1B	265,245.06	1C	0.00				
29	1A	4719 - Other retail sale in non-specialised stores	1B	1,032.14	1C	238.19				
30	1A	5010 - Sea and coastal passenger water transport	1B	3,172,811.08	1C	155,708.64				
31	1A	5221 - Service activities incidental to land transportation	1B	843,096.53	1C	550.05				
32	1A	5320 - Other postal and courier activities	1B	350,138.14	1C	78,790.51				
33	1A	6820 - Renting and operating of own or leased real estate	1B	778,349.98	1C	196,169.51				
34	1A	7112 - Engineering activities and related technical consultancy	1B	39.52	1C	10.63				
35	1A	9999 - NACEs not included in Taxonomy	1B	5,121,016.37	1C	851,701.77				
36	1A	TOTAL	1B	84,743,748.93	1C	36,916,549.57				

**GAR002- Turnover**

	Climate Change Adaptation (CCA)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (CCA)		EUR m		Of which environmentally sustainable (CCA)	
	e		f		g		h	
1	1F	0.00	1G	0.00				
2	1F	0.00	1G	0.00				
3	1F	0.00	1G	0.00				
4	1F	0.00	1G	0.00				
5	1F	0.00	1G	0.00				
6	1F	0.00	1G	0.00				
7	1F	0.00	1G	0.00				
8	1F	0.00	1G	0.00				
9	1F	0.00	1G	0.00				
10	1F	0.00	1G	0.00				
11	1F	0.00	1G	0.00				
12	1F	0.00	1G	0.00				
13	1F	0.00	1G	0.00				
14	1F	0.00	1G	0.00				
15	1F	0.00	1G	0.00				
16	1F	0.00	1G	0.00				
17	1F	0.00	1G	0.00				

**GAR002- Turnover**

18	1F	0.00	1G	0.00				
19	1F	0.00	1G	0.00				
20	1F	0.00	1G	0.00				
21	1F	0.00	1G	0.00				
22	1F	0.00	1G	0.00				
23	1F	134,732.91	1G	0.00				
24	1F	212,587.56	1G	7,562.49				
25	1F	5,000.12	1G	5,000.12				
26	1F	0.00	1G	0.00				
27	1F	0.00	1G	0.00				
28	1F	0.00	1G	0.00				
29	1F	0.00	1G	0.00				
30	1F	0.00	1G	0.00				
31	1F	0.00	1G	0.00				
32	1F	0.00	1G	0.00				
33	1F	0.00	1G	0.00				
34	1F	0.00	1G	0.00				
35	1F	145,419.13	1G	0.00				
36	1F	497,739.72	1G	12,562.61				

**GAR002- Turnover**

	Water and Marine Resources (WTR)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (WTR)		EUR m		Of which environmentally sustainable (WTR)	
	i		j		k		l	
1	1J	0.00	1K	0.00				
2	1J	0.00	1K	0.00				
3	1J	0.00	1K	0.00				
4	1J	0.00	1K	0.00				
5	1J	0.00	1K	0.00				
6	1J	0.00	1K	0.00				
7	1J	0.00	1K	0.00				
8	1J	0.00	1K	0.00				
9	1J	0.00	1K	0.00				
10	1J	0.00	1K	0.00				
11	1J	0.00	1K	0.00				
12	1J	0.00	1K	0.00				
13	1J	13,230.72	1K	461.54				
14	1J	0.00	1K	0.00				
15	1J	0.00	1K	0.00				
16	1J	0.00	1K	0.00				

**GAR002- Turnover**

17	1J	765,730.55	1K	654,367.15				
18	1J	0.00	1K	0.00				
19	1J	0.00	1K	0.00				
20	1J	0.00	1K	0.00				
21	1J	0.00	1K	0.00				
22	1J	0.00	1K	0.00				
23	1J	93,198.71	1K	0.00				
24	1J	0.00	1K	0.00				
25	1J	0.00	1K	0.00				
26	1J	0.00	1K	0.00				
27	1J	0.00	1K	0.00				
28	1J	0.00	1K	0.00				
29	1J	0.00	1K	0.00				
30	1J	0.00	1K	0.00				
31	1J	0.00	1K	0.00				
32	1J	0.00	1K	0.00				
33	1J	0.00	1K	0.00				
34	1J	0.00	1K	0.00				
35	1J	30,349.61	1K	0.00				
36	1J	902,509.59	1K	654,828.68				



**GAR002- Turnover**

	Circular Economy (CE)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (CE)		EUR m		Of which environmentally sustainable (CE)	
	m		n		o		p	
1	1N	0.00	1O	0.00				
2	1N	0.00	1O	0.00				
3	1N	0.00	1O	0.00				
4	1N	0.00	1O	0.00				
5	1N	0.00	1O	0.00				
6	1N	0.00	1O	0.00				
7	1N	9,101.92	1O	0.00				
8	1N	0.00	1O	0.00				
9	1N	0.00	1O	0.00				
10	1N	0.00	1O	0.00				
11	1N	0.00	1O	0.00				
12	1N	0.00	1O	0.00				
13	1N	657,228.39	1O	54,461.34				
14	1N	109,095.10	1O	0.00				
15	1N	0.00	1O	0.00				
16	1N	0.00	1O	0.00				

**GAR002- Turnover**

17	1N	2,964.56	10	0.00				
18	1N	0.00	10	0.00				
19	1N	0.00	10	0.00				
20	1N	0.00	10	0.00				
21	1N	0.00	10	0.00				
22	1N	0.00	10	0.00				
23	1N	0.00	10	0.00				
24	1N	0.00	10	0.00				
25	1N	0.00	10	0.00				
26	1N	0.00	10	0.00				
27	1N	0.00	10	0.00				
28	1N	0.00	10	0.00				
29	1N	0.00	10	0.00				
30	1N	0.00	10	0.00				
31	1N	0.00	10	0.00				
32	1N	0.00	10	0.00				
33	1N	0.00	10	0.00				
34	1N	12.01	10	0.00				
35	1N	43,790.33	10	0.00				
36	1N	822,192.32	10	54,461.34				

**GAR002- Turnover**

	Pollution Prevention and Control (PPC)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (PPC)		EUR m		Of which environmentally sustainable (PPC)	
	q		r		s		t	
1	1R	0.00	1S	0.00				
2	1R	0.00	1S	0.00				
3	1R	0.00	1S	0.00				
4	1R	0.00	1S	0.00				
5	1R	1,446.57	1S	0.00				
6	1R	0.00	1S	0.00				
7	1R	0.00	1S	0.00				
8	1R	0.00	1S	0.00				
9	1R	0.00	1S	0.00				
10	1R	0.00	1S	0.00				
11	1R	0.00	1S	0.00				
12	1R	0.00	1S	0.00				
13	1R	0.00	1S	0.00				
14	1R	0.00	1S	0.00				
15	1R	0.00	1S	0.00				
16	1R	0.00	1S	0.00				

**GAR002- Turnover**

17	1R	494.09	1S	0.00				
18	1R	0.00	1S	0.00				
19	1R	0.00	1S	0.00				
20	1R	0.00	1S	0.00				
21	1R	0.00	1S	0.00				
22	1R	0.00	1S	0.00				
23	1R	0.00	1S	0.00				
24	1R	0.00	1S	0.00				
25	1R	0.00	1S	0.00				
26	1R	0.00	1S	0.00				
27	1R	0.00	1S	0.00				
28	1R	0.00	1S	0.00				
29	1R	0.00	1S	0.00				
30	1R	0.00	1S	0.00				
31	1R	0.00	1S	0.00				
32	1R	0.00	1S	0.00				
33	1R	0.00	1S	0.00				
34	1R	0.00	1S	0.00				
35	1R	4,841.08	1S	0.00				
36	1R	6,781.75	1S	0.00				

**GAR002- Turnover**

	Biodiversity and ecosystems (BIO)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (BIO)		EUR m		Of which environmentally sustainable (BIO)	
	u		v		w		x	
1	1V	0.00	1W	0.00				
2	1V	0.00	1W	0.00				
3	1V	0.00	1W	0.00				
4	1V	0.00	1W	0.00				
5	1V	0.00	1W	0.00				
6	1V	0.00	1W	0.00				
7	1V	0.00	1W	0.00				
8	1V	0.00	1W	0.00				
9	1V	0.00	1W	0.00				
10	1V	0.00	1W	0.00				
11	1V	0.00	1W	0.00				
12	1V	0.00	1W	0.00				
13	1V	0.00	1W	0.00				
14	1V	0.00	1W	0.00				
15	1V	0.00	1W	0.00				
16	1V	0.00	1W	0.00				

**GAR002- Turnover**

17	1V	0.00	1W	0.00				
18	1V	0.00	1W	0.00				
19	1V	0.00	1W	0.00				
20	1V	0.00	1W	0.00				
21	1V	0.00	1W	0.00				
22	1V	0.00	1W	0.00				
23	1V	0.00	1W	0.00				
24	1V	0.00	1W	0.00				
25	1V	0.00	1W	0.00				
26	1V	0.00	1W	0.00				
27	1V	0.00	1W	0.00				
28	1V	0.00	1W	0.00				
29	1V	0.00	1W	0.00				
30	1V	0.00	1W	0.00				
31	1V	0.00	1W	0.00				
32	1V	0.00	1W	0.00				
33	1V	0.00	1W	0.00				
34	1V	0.00	1W	0.00				
35	1V	0.00	1W	0.00				
36	1V	0.00	1W	0.00				

**GAR002- Turnover**

	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFCs not subject to NFRD			
	Gross carrying amount				Gross carrying amount			
	EUR m		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		EUR m		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
	y		z		aa		ab	
1	Z	11,089,678.56	AA	0.00				
2	Z	615,917.93	AA	0.00				
3	Z	702,575.04	AA	0.00				
4	Z	116,568.04	AA	114,622.08				
5	Z	236,768.71	AA	18,032.30				
6	Z	164,233.85	AA	45,687.60				
7	Z	365,299.57	AA	108,611.76				
8	Z	435,571.90	AA	404,208.71				
9	Z	3,562,602.96	AA	0.00				
10	Z	3,845,331.25	AA	3,656,364.29				
11	Z	-5,259.44	AA	0.00				
12	Z	1,069,788.73	AA	0.00				
13	Z	1,607,916.55	AA	670,896.40				
14	Z	4,917,967.40	AA	685,050.91				
15	Z	19,523,253.90	AA	16,170,938.85				
16	Z	754,323.70	AA	0.00				

**GAR002- Turnover**

17	Z	4,345,020.35	AA	3,835,840.17			
18	Z	891,947.62	AA	846,839.01			
19	Z	6,596,873.36	AA	4,434,720.90			
20	Z	1,066,884.29	AA	933,247.41			
21	Z	1,084,335.07	AA	1,084,335.07			
22	Z	12,634.53	AA	0.00			
23	Z	4,639,168.18	AA	1,704,928.50			
24	Z	1,713,043.88	AA	400,880.27			
25	Z	6,721,155.46	AA	1,240,028.68			
26	Z	143,175.57	AA	0.00			
27	Z	54.35	AA	0.00			
28	Z	265,245.06	AA	0.00			
29	Z	1,032.14	AA	238.19			
30	Z	3,172,811.08	AA	155,708.64			
31	Z	843,096.53	AA	550.05			
32	Z	350,138.14	AA	78,790.51			
33	Z	778,349.98	AA	196,169.51			
34	Z	51.53	AA	10.63			
35	Z	5,345,416.53	AA	851,701.77			
36	Z	86,972,972.30	AA	37,638,402.21			



**GAR002- Capex**
**GAR002 – Capex**

% (compared to total assets in the denominator)		Disclosure reference date T									
		Climate Change Mitigation (CCM)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
						Of which: use of proceeds		Of which: transitional		Of which: enabling	
		a		b		c		d		e	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1A		1B		1C		1D		1E	
2	Financial undertakings	2A		2B		2C		2D		2E	
3	Credit institutions	3A		3B		3C		3D		3E	
4	Loans and advances	4A		4B		4C		4D		4E	
5	Debt securities, including UoP	5A		5B		5C		5D		5E	
6	Equity instruments	6A		6B				6D		6E	
7	Other financial corporations	7A		7B		7C		7D		7E	
8	Of which: investment firms	8A		8B		8C		8D		8E	
9	Loans and advances	9A		9B		9C		9D		9E	

**GAR002- Capex**

10	Debt securities, including UoP	10A		10B		10C		10D		10E	
11	Equity instruments	11A		11B				11D		11E	
12	Of which: management companies	12A		12B		12C		12D		12E	
13	Loans and advances	13A		13B		13C		13D		13E	
14	Debt securities, including UoP	14A		14B		14C		14D		14E	
15	Equity instruments	15A		15B				15D		15E	
16	Of which: insurance undertakings	16A		16B		16C		16D		16E	
17	Loans and advances	17A		17B		17C		17D		17E	
18	Debt securities, including UoP	18A		18B		18C		18D		18E	
19	Equity instruments	19A		19B				19D		19E	
20	Non-financial undertakings	20A		20B		20C		20D		20E	
21	Loans and advances	21A		21B		21C		21D		21E	
22	Debt securities, including UoP	22A		22B		22C		22D		22E	
23	Equity instruments	23A		23B				23D		23E	
24	Households	24A		24B		24C		24D		24E	
25	Of which: loans collateralised by residential immovable property	25A		25B		25C		25D		25E	
26	Of which: building renovation loans	26A		26B		26C		26D		26E	
27	Of which: motor vehicle loans	27A		27B		27C		27D		27E	
28	Local governments financing	28A		28B		28C		28D		28E	
29	Housing financing	29A		29B		29C		29D		29E	
30	Local governments financing	30A		30B		30C		30D		30E	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31A		31B		31C		31D		31E	
32	Total GAR assets	32A		32B		32C		32D		32E	

**GAR002- Capex**

'% (compared to total assets in the denominator)		Disclosure reference date T							
		Climate Change Adaptation (CCA)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		f		g		h		i	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1F		1G		1H		1I	
2	Financial undertakings	2F		2G		2H		2I	
3	Credit institutions	3F		3G		3H		3I	
4	Loans and advances	4F		4G		4H		4I	
5	Debt securities, including UoP	5F		5G		5H		5I	
6	Equity instruments	6F		6G				6I	
7	Other financial corporations	7F		7G		7H		7I	
8	Of which: investment firms	8F		8G		8H		8I	

**GAR002- Capex**

9	Loans and advances	9F	9G	9H	9I
10	Debt securities, including UoP	10F	10G	10H	10I
11	Equity instruments	11F	11G		11I
12	Of which: management companies	12F	12G	12H	12I
13	Loans and advances	13F	13G	13H	13I
14	Debt securities, including UoP	14F	14G	14H	14I
15	Equity instruments	15F	15G		15I
16	Of which: insurance undertakings	16F	16G	16H	16I
17	Loans and advances	17F	17G	17H	17I
18	Debt securities, including UoP	18F	18G	18H	18I
19	Equity instruments	19F	19G		19I
20	Non-financial undertakings	20F	20G	20H	20I
21	Loans and advances	21F	21G	21H	21I
22	Debt securities, including UoP	22F	22G	22H	22I
23	Equity instruments	23F	23G		23I
24	Households	24F	24G	24H	24I
25	Of which: loans collateralised by residential immovable property	25F	25G	25H	25I
26	Of which: building renovation loans	26F	26G	26H	26I
27	Of which: motor vehicle loans				
28	Local governments financing	28F	28G	28H	28I
29	Housing financing	29F	29G	29H	29I
30	Local governments financing	30F	30G	30H	30I
31	Collateral obtained by taking possession: residential and commercial immovable properties	31F	31G	31H	31I
32	Total GAR assets	32F	32G	32H	32I

**GAR002- Capex**

% (compared to total assets in the denominator)		Disclosure reference date T							
		Water and Marine Resources (WTR)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		j	k		l		m		
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1J		1K		1L		1M	
2	Financial undertakings	2J		2K		2L		2M	
3	Credit institutions	3J		3K		3L		3M	
4	Loans and advances	4J		4K		4L		4M	
5	Debt securities, including UoP	5J		5K		5L		5M	
6	Equity instruments	6J		6K				6M	
7	Other financial corporations	7J		7K		7L		7M	
8	Of which: investment firms	8J		8K		8L		8M	
9	Loans and advances	9J		9K		9L		9M	
10	Debt securities, including UoP	10J		10K		10L		10M	
11	Equity instruments	11J		11K				11M	
12	Of which: management companies	12J		12K		12L		12M	
13	Loans and advances	13J		13K		13L		13M	

**GAR002- Capex**

14	Debt securities, including UoP	14J	14K	14L	14M
15	Equity instruments	15J	15K		15M
16	Of which: insurance undertakings	16J	16K	16L	16M
17	Loans and advances	17J	17K	17L	17M
18	Debt securities, including UoP	18J	18K	18L	18M
19	Equity instruments	19J	19K		19M
20	Non-financial undertakings	20J	20K	20L	20M
21	Loans and advances	21J	21K	21L	21M
22	Debt securities, including UoP	22J	22K	22L	22M
23	Equity instruments	23J	23K		23M
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28J	28K	28L	28M
29	Housing financing	29J	29K	29L	29M
30	Local governments financing	30J	30K	30L	30M
31	Collateral obtained by taking possession: residential and commercial immovable properties	31J	31K	31L	31M
32	Total GAR assets	32J	32K	32L	32M

**GAR002- Capex**

% (compared to total assets in the denominator)		Disclosure reference date T							
		Circular Economy (CE)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		n	o		p		q		
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1N		1O		1P		1Q	
2	Financial undertakings	2N		2O		2P		2Q	
3	Credit institutions	3N		3O		3P		3Q	
4	Loans and advances	4N		4O		4P		4Q	
5	Debt securities, including UoP	5N		5O		5P		5Q	
6	Equity instruments	6N		6O				6Q	
7	Other financial corporations	7N		7O		7P		7Q	
8	Of which: investment firms	8N		8O		8P		8Q	
9	Loans and advances	9N		9O		9P		9Q	
10	Debt securities, including UoP	10N		10O		10P		10Q	
11	Equity instruments	11N		11O				11Q	
12	Of which: management companies	12N		12O		12P		12Q	
13	Loans and advances	13N		13O		13P		13Q	
14	Debt securities, including UoP	14N		14O		14P		14Q	
15	Equity instruments	15N		15O				15Q	
16	Of which: insurance undertakings	16N		16O		16P		16Q	
17	Loans and advances	17N		17O		17P		17Q	
18	Debt securities, including UoP	18N		18O		18P		18Q	

**GAR002- Capex**

19	Equity instruments	19N		19O			19Q	
20	Non-financial undertakings	20N		20O		20P	20Q	
21	Loans and advances	21N		21O		21P	21Q	
22	Debt securities, including UoP	22N		22O		22P	22Q	
23	Equity instruments	23N		23O			23Q	
24	Households	24N		24O		24P	24Q	
25	Of which: loans collateralised by residential immovable property	25N		25O		25P	25Q	
26	Of which: building renovation loans	26N		26O		26P	26Q	
27	Of which: motor vehicle loans							
28	Local governments financing	28N		28O		28P	28Q	
29	Housing financing	29N		29O		29P	29Q	
30	Local governments financing	30N		30O		30P	30Q	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31N		31O		31P	31Q	
32	Total GAR assets	32N		32O		32P	32Q	

% (compared to total assets in the denominator)	Disclosure reference date T	
	Pollution Prevention and Control (PPC)	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)



**GAR002- Capex**

						Of which: use of proceeds		Of which: enabling	
		r		s		t		u	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1R		1S		1T		1U	
2	Financial undertakings	2R		2S		2T		2U	
3	Credit institutions	3R		3S		3T		3U	
4	Loans and advances	4R		4S		4T		4U	
5	Debt securities, including UoP	5R		5S		5T		5U	
6	Equity instruments	6R		6S				6U	
7	Other financial corporations	7R		7S		7T		7U	
8	Of which: investment firms	8R		8S		8T		8U	
9	Loans and advances	9R		9S		9T		9U	
10	Debt securities, including UoP	10R		10S		10T		10U	
11	Equity instruments	11R		11S				11U	
12	Of which: management companies	12R		12S		12T		12U	
13	Loans and advances	13R		13S		13T		13U	
14	Debt securities, including UoP	14R		14S		14T		14U	
15	Equity instruments	15R		15S				15U	
16	Of which: insurance undertakings	16R		16S		16T		16U	
17	Loans and advances	17R		17S		17T		17U	
18	Debt securities, including UoP	18R		18S		18T		18U	
19	Equity instruments	19R		19S				19U	
20	Non-financial undertakings	20R		20S		20T		20U	
21	Loans and advances	21R		21S		21T		21U	
22	Debt securities, including UoP	22R		22S		22T		22U	
23	Equity instruments	23R		23S				23U	

**GAR002- Capex**

24	Households						
25	Of which: loans collateralised by residential immovable property						
26	Of which: building renovation loans						
27	Of which: motor vehicle loans						
28	Local governments financing	28R	28S	28T	28U		
29	Housing financing	29R	29S	29T	29U		
30	Local governments financing	30R	30S	30T	30U		
31	Collateral obtained by taking possession: residential and commercial immovable properties	31R	31S	31T	31U		
32	Total GAR assets	32R	32S	32T	32U		

% (compared to total assets in the denominator)	Disclosure reference date T							
	Biodiversity and ecosystems (BIO)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Of which: use of proceeds		Of which: enabling	
	v		w		x		z	
GAR - Assets included in both numerator and denominator								

**GAR002- Capex**

1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1V		1W		1X		1Y	
2	Financial undertakings	2V		2W		2X		2Y	
3	Credit institutions	3V		3W		3X		3Y	
4	Loans and advances	4V		4W		4X		4Y	
5	Debt securities, including UoP	5V		5W		5X		5Y	
6	Equity instruments	6V		6W				6Y	
7	Other financial corporations	7V		7W		7X		7Y	
8	Of which: investment firms	8V		8W		8X		8Y	
9	Loans and advances	9V		9W		9X		9Y	
10	Debt securities, including UoP	10V		10W		10X		10Y	
11	Equity instruments	11V		11W				11Y	
12	Of which: management companies	12V		12W		12X		12Y	
13	Loans and advances	13V		13W		13X		13Y	
14	Debt securities, including UoP	14V		14W		14X		14Y	
15	Equity instruments	15V		15W				15Y	
16	Of which: insurance undertakings	16V		16W		16X		16Y	
17	Loans and advances	17V		17W		17X		17Y	
18	Debt securities, including UoP	18V		18W		18X		18Y	
19	Equity instruments	19V		19W				19Y	
20	Non-financial undertakings	20V		20W		20X		20Y	
21	Loans and advances	21V		21W		21X		21Y	
22	Debt securities, including UoP	22V		22W		22X		22Y	
23	Equity instruments	23V		23W				23Y	
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								

**GAR002- Capex**

28	Local governments financing	28V		28W		28X		28Y	
29	Housing financing	29V		29W		29X		29Y	
30	Local governments financing	30V		30W		30X		30Y	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31V		31W		31X		31Y	
32	Total GAR assets	32V		32W		32X		32Y	

'% (compared to total assets in the denominator)		Disclosure reference date T											
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										Proportion of total covered assets	
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
					Of which: use of proceeds		Of which: transitional		Of which: enabling				
		aa		ab		ac		ad		ae		af	
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1Z		1AA		1AB		1AC		1AD		1AE	
2	Financial undertakings	2Z		2AA		2AB		2AC		2AD		2AE	

**GAR002- Capex**

3	Credit institutions	3Z	3AA	3AB	3AC	3AD	3AE
4	Loans and advances	4Z	4AA	4AB	4AC	4AD	4AE
5	Debt securities, including UoP	5Z	5AA	5AB	5AC	5AD	5AE
6	Equity instruments	6Z	6AA		6AC	6AD	6AE
7	Other financial corporations	7Z	7AA	7AB	7AC	7AD	7AE
8	Of which: investment firms	8Z	8AA	8AB	8AC	8AD	8AE
9	Loans and advances	9Z	9AA	9AB	9AC	9AD	9AE
10	Debt securities, including UoP	10Z	10AA	10AB	10AC	10AD	10AE
11	Equity instruments	11Z	11AA		11AC	11AD	11AE
12	Of which: management companies	12Z	12AA	12AB	12AC	12AD	12AE
13	Loans and advances	13Z	13AA	13AB	13AC	13AD	13AE
14	Debt securities, including UoP	14Z	14AA	14AB	14AC	14AD	14AE
15	Equity instruments	15Z	15AA		15AC	15AD	15AE
16	Of which: insurance undertakings	16Z	16AA	16AB	16AC	16AD	16AE
17	Loans and advances	17Z	17AA	17AB	17AC	17AD	17AE
18	Debt securities, including UoP	18Z	18AA	18AB	18AC	18AD	18AE
19	Equity instruments	19Z	19AA		19AC	19AD	19AE
20	Non-financial undertakings	20Z	20AA	20AB	20AC	20AD	20AE
21	Loans and advances	21Z	21AA	21AB	21AC	21AD	21AE
22	Debt securities, including UoP	22Z	22AA	22AB	22AC	22AD	22AE
23	Equity instruments	23Z	23AA		23AC	23AD	23AE

**GAR002- Capex**

2 4	Households	24Z		24AA		24AB		24AC		24AD		24AE	
2 5	Of which: loans collateralised by residential immovable property	25Z		25AA		25AB		25AC		25AD		25AE	
2 6	Of which: building renovation loans	26Z		26AA		26AB		26AC		26AD		26AE	
2 7	Of which: motor vehicle loans												
2 8	Local governments financing	28Z		28AA		28AB		28AC		28AD		28AE	
2 9	Housing financing	29Z		29AA		29AB		29AC		29AD		29AE	
3 0	Local governments financing	30Z		30AA		30AB		30AC		30AD		30AE	
3 1	Collateral obtained by taking possession: residential and commercial immovable properties	31Z		31AA		31AB		31AC		31AD		31AE	
3 2	Total GAR assets	32Z		32AA		32AB		32AC		32AD		32AE	

**GAR003- Turnover**

## GAR003 – Turnover

'% (compared to total assets in the denominator)		Disclosure reference date T									
		Climate Change Mitigation (CCM)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
				Of which: use of proceeds		Of which: transitional		Of which: enabling			
		a		b		c		d		e	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1A		1B		1C		1D		1E	
2	Financial undertakings	2A		2B		2C		2D		2E	
3	Credit institutions	3A		3B		3C		3D		3E	
4	Loans and advances	4A		4B		4C		4D		4E	
5	Debt securities, including UoP	5A		5B		5C		5D		5E	
6	Equity instruments	6A		6B				6D		6E	
7	Other financial corporations	7A		7B		7C		7D		7E	
8	Of which: investment firms	8A		8B		8C		8D		8E	
9	Loans and advances	9A		9B		9C		9D		9E	
10	Debt securities, including UoP	10A		10B		10C		10D		10E	
11	Equity instruments	11A		11B				11D		11E	
12	Of which: management companies	12A		12B		12C		12D		12E	
13	Loans and advances	13A		13B		13C		13D		13E	

**GAR003- Turnover**

14	Debt securities, including UoP	14A		14B		14C		14D		14E	
15	Equity instruments	15A		15B				15D		15E	
16	Of which: insurance undertakings	16A		16B		16C		16D		16E	
17	Loans and advances	17A		17B		17C		17D		17E	
18	Debt securities, including UoP	18A		18B		18C		18D		18E	
19	Equity instruments	19A		19B				19D		19E	
20	Non-financial undertakings	20A		20B		20C		20D		20E	
21	Loans and advances	21A		21B		21C		21D		21E	
22	Debt securities, including UoP	22A		22B		22C		22D		22E	
23	Equity instruments	23A		23B				23D		23E	
24	Households	24A		24B		24C		24D		24E	
25	Of which: loans collateralised by residential immovable property	25A		25B		25C		25D		25E	
26	Of which: building renovation loans	26A		26B		26C		26D		26E	
27	Of which: motor vehicle loans	27A		27B		27C		27D		27E	
28	Local governments financing	28A		28B		28C		28D		28E	
29	Housing financing	29A		29B		29C		29D		29E	
30	Local governments financing	30A		30B		30C		30D		30E	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31A		31B		31C		31D		31E	
32	Total GAR assets	32A		32B		32C		32D		32E	

% (compared to total assets in the  
denominator)

Disclosure reference date T

Climate Change Adaptation (CCA)

Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)



**GAR003- Turnover**

				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
		f		g		h		i	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1F		1G		1H		1I	
2	Financial undertakings	2F		2G		2H		2I	
3	Credit institutions	3F		3G		3H		3I	
4	Loans and advances	4F		4G		4H		4I	
5	Debt securities, including UoP	5F		5G		5H		5I	
6	Equity instruments	6F		6G				6I	
7	Other financial corporations	7F		7G		7H		7I	
8	Of which: investment firms	8F		8G		8H		8I	
9	Loans and advances	9F		9G		9H		9I	
10	Debt securities, including UoP	10F		10G		10H		10I	
11	Equity instruments	11F		11G				11I	
12	Of which: management companies	12F		12G		12H		12I	
13	Loans and advances	13F		13G		13H		13I	
14	Debt securities, including UoP	14F		14G		14H		14I	
15	Equity instruments	15F		15G				15I	
16	Of which: insurance undertakings	16F		16G		16H		16I	
17	Loans and advances	17F		17G		17H		17I	
18	Debt securities, including UoP	18F		18G		18H		18I	
19	Equity instruments	19F		19G				19I	
20	Non-financial undertakings	20F		20G		20H		20I	
21	Loans and advances	21F		21G		21H		21I	
22	Debt securities, including UoP	22F		22G		22H		22I	

**GAR003- Turnover**

23	Equity instruments	23F	23G			23I	
24	Households	24F	24G		24H	24I	
25	Of which: loans collateralised by residential immovable property	25F	25G		25H	25I	
26	Of which: building renovation loans	26F	26G		26H	26I	
27	Of which: motor vehicle loans						
28	Local governments financing	28F	28G		28H	28I	
29	Housing financing	29F	29G		29H	29I	
30	Local governments financing	30F	30G		30H	30I	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31F	31G		31H	31I	
32	Total GAR assets	32F	32G		32H	32I	

% (compared to total assets in the denominator)		Disclosure reference date T							
		Water and Marine Resources (WTR)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		j		k		l		m	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1J		1K		1L		1M	
2	Financial undertakings	2J		2K		2L		2M	
3	Credit institutions	3J		3K		3L		3M	
4	Loans and advances	4J		4K		4L		4M	
5	Debt securities, including UoP	5J		5K		5L		5M	

**GAR003- Turnover**

6	Equity instruments	6J		6K			6M	
7	Other financial corporations	7J		7K		7L	7M	
8	Of which: investment firms	8J		8K		8L	8M	
9	Loans and advances	9J		9K		9L	9M	
10	Debt securities, including UoP	10J		10K		10L	10M	
11	Equity instruments	11J		11K			11M	
12	Of which: management companies	12J		12K		12L	12M	
13	Loans and advances	13J		13K		13L	13M	
14	Debt securities, including UoP	14J		14K		14L	14M	
15	Equity instruments	15J		15K			15M	
16	Of which: insurance undertakings	16J		16K		16L	16M	
17	Loans and advances	17J		17K		17L	17M	
18	Debt securities, including UoP	18J		18K		18L	18M	
19	Equity instruments	19J		19K			19M	
20	Non-financial undertakings	20J		20K		20L	20M	
21	Loans and advances	21J		21K		21L	21M	
22	Debt securities, including UoP	22J		22K		22L	22M	
23	Equity instruments	23J		23K			23M	
24	Households							
25	Of which: loans collateralised by residential immovable property							
26	Of which: building renovation loans							
27	Of which: motor vehicle loans							
28	Local governments financing	28J		28K		28L	28M	
29	Housing financing	29J		29K		29L	29M	
30	Local governments financing	30J		30K		30L	30M	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31J		31K		31L	31M	
32	Total GAR assets	32J		32K		32L	32M	

**GAR003- Turnover**

% (compared to total assets in the denominator)		Disclosure reference date T							
		Circular Economy (CE)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
		n		o		p		q	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1N		1O		1P		1Q	
2	Financial undertakings	2N		2O		2P		2Q	
3	Credit institutions	3N		3O		3P		3Q	
4	Loans and advances	4N		4O		4P		4Q	
5	Debt securities, including UoP	5N		5O		5P		5Q	
6	Equity instruments	6N		6O				6Q	
7	Other financial corporations	7N		7O		7P		7Q	
8	Of which: investment firms	8N		8O		8P		8Q	
9	Loans and advances	9N		9O		9P		9Q	
10	Debt securities, including UoP	10N		10O		10P		10Q	
11	Equity instruments	11N		11O				11Q	

**GAR003- Turnover**

12	Of which: management companies	12N	120	12P	12Q
13	Loans and advances	13N	130	13P	13Q
14	Debt securities, including UoP	14N	140	14P	14Q
15	Equity instruments	15N	150		15Q
16	Of which: insurance undertakings	16N	160	16P	16Q
17	Loans and advances	17N	170	17P	17Q
18	Debt securities, including UoP	18N	180	18P	18Q
19	Equity instruments	19N	190		19Q
20	Non-financial undertakings	20N	200	20P	20Q
21	Loans and advances	21N	210	21P	21Q
22	Debt securities, including UoP	22N	220	22P	22Q
23	Equity instruments	23N	230		23Q
24	Households	24N	240	24P	24Q
25	Of which: loans collateralised by residential immovable property	25N	250	25P	25Q
26	Of which: building renovation loans	26N	260	26P	26Q
27	Of which: motor vehicle loans				
28	Local governments financing	28N	280	28P	28Q
29	Housing financing	29N	290	29P	29Q
30	Local governments financing	30N	300	30P	30Q
31	Collateral obtained by taking possession: residential and commercial immovable properties	31N	310	31P	31Q
32	Total GAR assets	32N	320	32P	32Q

**GAR003- Turnover**

% (compared to total assets in the denominator)		Disclosure reference date T							
		Pollution Prevention and Control (PPC)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		r		s		t		u	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1R		1S		1T		1U	
2	Financial undertakings	2R		2S		2T		2U	
3	Credit institutions	3R		3S		3T		3U	
4	Loans and advances	4R		4S		4T		4U	
5	Debt securities, including UoP	5R		5S		5T		5U	
6	Equity instruments	6R		6S				6U	
7	Other financial corporations	7R		7S		7T		7U	
8	Of which: investment firms	8R		8S		8T		8U	
9	Loans and advances	9R		9S		9T		9U	
10	Debt securities, including UoP	10R		10S		10T		10U	
11	Equity instruments	11R		11S				11U	
12	Of which: management companies	12R		12S		12T		12U	
13	Loans and advances	13R		13S		13T		13U	
14	Debt securities, including UoP	14R		14S		14T		14U	
15	Equity instruments	15R		15S				15U	
16	Of which: insurance undertakings	16R		16S		16T		16U	

**GAR003- Turnover**

17	Loans and advances	17R	17S	17T	17U
18	Debt securities, including UoP	18R	18S	18T	18U
19	Equity instruments	19R	19S		19U
20	Non-financial undertakings	20R	20S	20T	20U
21	Loans and advances	21R	21S	21T	21U
22	Debt securities, including UoP	22R	22S	22T	22U
23	Equity instruments	23R	23S		23U
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28R	28S	28T	28U
29	Housing financing	29R	29S	29T	29U
30	Local governments financing	30R	30S	30T	30U
31	Collateral obtained by taking possession: residential and commercial immovable properties	31R	31S	31T	31U
32	Total GAR assets	32R	32S	32T	32U

% (compared to total assets in the denominator)

Disclosure reference date T

Biodiversity and ecosystems (BIO)

**GAR003- Turnover**

		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
		v		w		x		z	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1V		1W		1X		1Y	
2	Financial undertakings	2V		2W		2X		2Y	
3	Credit institutions	3V		3W		3X		3Y	
4	Loans and advances	4V		4W		4X		4Y	
5	Debt securities, including UoP	5V		5W		5X		5Y	
6	Equity instruments	6V		6W				6Y	
7	Other financial corporations	7V		7W		7X		7Y	
8	Of which: investment firms	8V		8W		8X		8Y	
9	Loans and advances	9V		9W		9X		9Y	
10	Debt securities, including UoP	10V		10W		10X		10Y	
11	Equity instruments	11V		11W				11Y	
12	Of which: management companies	12V		12W		12X		12Y	
13	Loans and advances	13V		13W		13X		13Y	
14	Debt securities, including UoP	14V		14W		14X		14Y	
15	Equity instruments	15V		15W				15Y	
16	Of which: insurance undertakings	16V		16W		16X		16Y	
17	Loans and advances	17V		17W		17X		17Y	
18	Debt securities, including UoP	18V		18W		18X		18Y	
19	Equity instruments	19V		19W				19Y	
20	Non-financial undertakings	20V		20W		20X		20Y	



**GAR003- Turnover**

21	Loans and advances	21V		21W		21X		21Y	
22	Debt securities, including UoP	22V		22W		22X		22Y	
23	Equity instruments	23V		23W				23Y	
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28V		28W		28X		28Y	
29	Housing financing	29V		29W		29X		29Y	
30	Local governments financing	30V		30W		30X		30Y	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31V		31W		31X		31Y	
32	Total GAR assets								

% (compared to total assets in the denominator)	Disclosure reference date T						
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
			Of which: use of proceeds	Of which: transitional	Of which: enabling		

**GAR003- Turnover**

		aa		ab		ac		ad		ae		af	
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1Z		1AA		1AB		1AC		1AD		1AE	
2	Financial undertakings	2Z		2AA		2AB		2AC		2AD		2AE	
3	Credit institutions	3Z		3AA		3AB		3AC		3AD		3AE	
4	Loans and advances	4Z		4AA		4AB		4AC		4AD		4AE	
5	Debt securities, including UoP	5Z		5AA		5AB		5AC		5AD		5AE	
6	Equity instruments	6Z		6AA				6AC		6AD		6AE	
7	Other financial corporations	7Z		7AA		7AB		7AC		7AD		7AE	
8	Of which: investment firms	8Z		8AA		8AB		8AC		8AD		8AE	
9	Loans and advances	9Z		9AA		9AB		9AC		9AD		9AE	
10	Debt securities, including UoP	10Z		10AA		10AB		10AC		10AD		10AE	
11	Equity instruments	11Z		11AA				11AC		11AD		11AE	
12	Of which: management companies	12Z		12AA		12AB		12AC		12AD		12AE	
13	Loans and advances	13Z		13AA		13AB		13AC		13AD		13AE	
14	Debt securities, including UoP	14Z		14AA		14AB		14AC		14AD		14AE	
15	Equity instruments	15Z		15AA				15AC		15AD		15AE	
16	Of which: insurance undertakings	16Z		16AA		16AB		16AC		16AD		16AE	
17	Loans and advances	17Z		17AA		17AB		17AC		17AD		17AE	

**GAR003- Turnover**

1 8	Debt securities, including UoP	18Z		18AA		18AB		18AC		18AD		18AE	
1 9	Equity instruments	19Z		19AA				19AC		19AD		19AE	
2 0	Non-financial undertakings	20Z		20AA		20AB		20AC		20AD		20AE	
2 1	Loans and advances	21Z		21AA		21AB		21AC		21AD		21AE	
2 2	Debt securities, including UoP	22Z		22AA		22AB		22AC		22AD		22AE	
2 3	Equity instruments	23Z		23AA				23AC		23AD		23AE	
2 4	Households	24Z		24AA		24AB		24AC		24AD		24AE	
2 5	Of which: loans collateralised by residential immovable property	25Z		25AA		25AB		25AC		25AD		25AE	
2 6	Of which: building renovation loans	26Z		26AA		26AB		26AC		26AD		26AE	
2 7	Of which: motor vehicle loans												
2 8	Local governments financing	28Z		28AA		28AB		28AC		28AD		28AE	
2 9	Housing financing	29Z		29AA		29AB		29AC		29AD		29AE	
3 0	Local governments financing	30Z		30AA		30AB		30AC		30AD		30AE	
3 1	Collateral obtained by taking possession: residential and commercial immovable properties	31Z		31AA		31AB		31AC		31AD		31AE	
3 2	Total GAR assets	32Z		32AA		32AB		32AC		32AD		32AE	

GAR003- T-1 Capex

## GAR003 – T-1 Capex

% (compared to total assets in the denominator)		Disclosure reference date T									
		Climate Change Mitigation (CCM)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: transitional		Of which: enabling	
		ag		ah		ai		aj		ak	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AF		1AG		1AH		1AI		1AJ	
2	Financial undertakings	2AF		2AG		2AH		2AI		2AJ	
3	Credit institutions	3AF		3AG		3AH		3AI		3AJ	
4	Loans and advances	4AF		4AG		4AH		4AI		4AJ	
5	Debt securities, including UoP	5AF		5AG		5AH		5AI		5AJ	
6	Equity instruments	6AF		6AG				6AI		6AJ	

**GAR003- T-1 Capex**

7	Other financial corporations	7AF		7AG		7AH		7AI		7AJ	
8	Of which: investment firms	8AF		8AG		8AH		8AI		8AJ	
9	Loans and advances	9AF		9AG		9AH		9AI		9AJ	
10	Debt securities, including UoP	10AF		10AG		10AH		10AI		10AJ	
11	Equity instruments	11AF		11AG				11AI		11AJ	
12	Of which: management companies	12AF		12AG		12AH		12AI		12AJ	
13	Loans and advances	13AF		13AG		13AH		13AI		13AJ	
14	Debt securities, including UoP	14AF		14AG		14AH		14AI		14AJ	
15	Equity instruments	15AF		15AG				15AI		15AJ	
16	Of which: insurance undertakings	16AF		16AG		16AH		16AI		16AJ	
17	Loans and advances	17AF		17AG		17AH		17AI		17AJ	
18	Debt securities, including UoP	18AF		18AG		18AH		18AI		18AJ	
19	Equity instruments	19AF		19AG				19AI		19AJ	
20	Non-financial undertakings	20AF		20AG		20AH		20AI		20AJ	
21	Loans and advances	21AF		21AG		21AH		21AI		21AJ	
22	Debt securities, including UoP	22AF		22AG		22AH		22AI		22AJ	
23	Equity instruments	23AF		23AG				23AI		23AJ	
24	Households	24AF		24AG		24AH		24AI		24AJ	
25	Of which: loans collateralised by residential immovable property	25AF		25AG		25AH		25AI		25AJ	
26	Of which: building renovation loans	26AF		26AG		26AH		26AI		26AJ	
27	Of which: motor vehicle loans	27AF		27AG		27AH		27AI		27AJ	
28	Local governments financing	28AF		28AG		28AH		28AI		28AJ	
29	Housing financing	29AF		29AG		29AH		29AI		29AJ	
30	Local governments financing	30AF		30AG		30AH		30AI		30AJ	

**GAR003- T-1 Capex**

31	Collateral obtained by taking possession: residential and commercial immovable properties								
		31AF		31AG		31AH		31AI	31AJ
32	Total GAR assets	32AF		32AG		32AH		32AI	32AJ

**GAR003- T-1 Capex**

% (compared to total assets in the denominator)		Disclosure reference date T							
		Climate Change Adaptation (CCA)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		al		am		an		ao	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AK		1AL		1AM		1AN	
2	Financial undertakings	2AK		2AL		2AM		2AN	
3	Credit institutions	3AK		3AL		3AM		3AN	
4	Loans and advances	4AK		4AL		4AM		4AN	
5	Debt securities, including UoP	5AK		5AL		5AM		5AN	
6	Equity instruments	6AK		6AL				6AN	
7	Other financial corporations	7AK		7AL		7AM		7AN	
8	Of which: investment firms	8AK		8AL		8AM		8AN	
9	Loans and advances	9AK		9AL		9AM		9AN	
10	Debt securities, including UoP	10AK		10AL		10AM		10AN	
11	Equity instruments	11AK		11AL				11AN	
12	Of which: management companies	12AK		12AL		12AM		12AN	
13	Loans and advances	13AK		13AL		13AM		13AN	
14	Debt securities, including UoP	14AK		14AL		14AM		14AN	
15	Equity instruments	15AK		15AL				15AN	
16	Of which: insurance undertakings	16AK		16AL		16AM		16AN	
17	Loans and advances	17AK		17AL		17AM		17AN	
18	Debt securities, including UoP	18AK		18AL		18AM		18AN	

**GAR003- T-1 Capex**

19	Equity instruments	19AK		19AL			19AN	
20	Non-financial undertakings	20AK		20AL		20AM	20AN	
21	Loans and advances	21AK		21AL		21AM	21AN	
22	Debt securities, including UoP	22AK		22AL		22AM	22AN	
23	Equity instruments	23AK		23AL			23AN	
24	Households	24AK		24AL		24AM	24AN	
25	Of which: loans collateralised by residential immovable property	25AK		25AL		25AM	25AN	
26	Of which: building renovation loans	26AK		26AL		26AM	26AN	
27	Of which: motor vehicle loans							
28	Local governments financing	28AK		28AL		28AM	28AN	
29	Housing financing	29AK		29AL		29AM	29AN	
30	Local governments financing	30AK		30AL		30AM	30AN	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AK		31AL		31AM	31AN	
32	Total GAR assets	32AK		32AL		32AM	32AN	

% (compared to total assets in the denominator)	Disclosure reference date T		
	Water and Marine Resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	



**GAR003- T-1 Capex**

						Of which: use of proceeds		Of which: enabling	
		ap		aq		ar		as	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AN		1AO		1AP		1AQ	
2	Financial undertakings	2AN		2AO		2AP		2AQ	
3	Credit institutions	3AN		3AO		3AP		3AQ	
4	Loans and advances	4AN		4AO		4AP		4AQ	
5	Debt securities, including UoP	5AN		5AO		5AP		5AQ	
6	Equity instruments	6AN		6AO		6AP			
7	Other financial corporations	7AN		7AO		7AP		7AQ	
8	Of which: investment firms	8AN		8AO		8AP		8AQ	
9	Loans and advances	9AN		9AO		9AP		9AQ	
10	Debt securities, including UoP	10AN		10AO		10AP		10AQ	
11	Equity instruments	11AN		11AO		11AP			
12	Of which: management companies	12AN		12AO		12AP		12AQ	
13	Loans and advances	13AN		13AO		13AP		13AQ	
14	Debt securities, including UoP	14AN		14AO		14AP		14AQ	
15	Equity instruments	15AN		15AO		15AP			
16	Of which: insurance undertakings	16AN		16AO		16AP		16AQ	
17	Loans and advances	17AN		17AO		17AP		17AQ	
18	Debt securities, including UoP	18AN		18AO		18AP		18AQ	
19	Equity instruments	19AN		19AO		19AP			
20	Non-financial undertakings	20AN		20AO		20AP		20AQ	
21	Loans and advances	21AN		21AO		21AP		21AQ	
22	Debt securities, including UoP	22AN		22AO		22AP		22AQ	
23	Equity instruments	23AN		23AO		23AP			

**GAR003- T-1 Capex**

24	Households	24AN					
25	Of which: loans collateralised by residential immovable property	25AN					
26	Of which: building renovation loans	26AN					
27	Of which: motor vehicle loans						
28	Local governments financing	28AN	28AO		28AP	28AQ	
29	Housing financing	29AN	29AO		29AP	29AQ	
30	Local governments financing	30AN	30AO		30AP	30AQ	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AN	31AO		31AP	31AQ	
32	Total GAR assets	32AN	32AO		32AP	32AQ	

% (compared to total assets in the denominator)		Disclosure reference date T							
		Circular Economy (CE)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
				Of which: use of proceeds		Of which: enabling			
		n	o		p		q		
	GAR - Assets included in both numerator and denominator								

**GAR003- T-1 Capex**

1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AS		1AT		1AU		1AV	
2	Financial undertakings	2AS		2AT		2AU		2AV	
3	Credit institutions	3AS		3AT		3AU		3AV	
4	Loans and advances	4AS		4AT		4AU		4AV	
5	Debt securities, including UoP	5AS		5AT		5AU		5AV	
6	Equity instruments	6AS		6AT				6AV	
7	Other financial corporations	7AS		7AT		7AU		7AV	
8	Of which: investment firms	8AS		8AT		8AU		8AV	
9	Loans and advances	9AS		9AT		9AU		9AV	
10	Debt securities, including UoP	10AS		10AT		10AU		10AV	
11	Equity instruments	11AS		11AT				11AV	
12	Of which: management companies	12AS		12AT		12AU		12AV	
13	Loans and advances	13AS		13AT		13AU		13AV	
14	Debt securities, including UoP	14AS		14AT		14AU		14AV	
15	Equity instruments	15AS		15AT				15AV	
16	Of which: insurance undertakings	16AS		16AT		16AU		16AV	
17	Loans and advances	17AS		17AT		17AU		17AV	
18	Debt securities, including UoP	18AS		18AT		18AU		18AV	
19	Equity instruments	19AS		19AT				19AV	
20	Non-financial undertakings	20AS		20AT		20AU		20AV	
21	Loans and advances	21AS		21AT		21AU		21AV	
22	Debt securities, including UoP	22AS		22AT		22AU		22AV	
23	Equity instruments	23AS		23AT				23AV	
24	Households	24AS		24AT		24AU		24AV	
25	Of which: loans collateralised by residential immovable property	25AS		25AT		25AU		25AV	
26	Of which: building renovation loans	26AS		26AT		26AU		26AV	
27	Of which: motor vehicle loans								

**GAR003- T-1 Capex**

28	Local governments financing	28AS	28AT	28AU	28AV
29	Housing financing	29AS	29AT	29AU	29AV
30	Local governments financing	30AS	30AT	30AU	30AV
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AS	31AT	31AU	31AV
32	Total GAR assets	32AS	32AT	32AU	32AV

% (compared to total assets in the denominator)		Disclosure reference date T							
		Pollution Prevention and Control (PPC)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		r		s		t		u	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AW		1AX		1AY		1AZ	
2	Financial undertakings	2AW		2AX		2AY		2AZ	
3	Credit institutions	3AW		3AX		3AY		3AZ	
4	Loans and advances	4AW		4AX		4AY		4AZ	

**GAR003- T-1 Capex**

5	Debt securities, including UoP	5AW	5AX	5AY	5AZ
6	Equity instruments	6AW	6AX		6AZ
7	Other financial corporations	7AW	7AX	7AY	7AZ
8	Of which: investment firms	8AW	8AX	8AY	8AZ
9	Loans and advances	9AW	9AX	9AY	9AZ
10	Debt securities, including UoP	10AW	10AX	10AY	10AZ
11	Equity instruments	11AW	11AX		11AZ
12	Of which: management companies	12AW	12AX	12AY	12AZ
13	Loans and advances	13AW	13AX	13AY	13AZ
14	Debt securities, including UoP	14AW	14AX	14AY	14AZ
15	Equity instruments	15AW	15AX		15AZ
16	Of which: insurance undertakings	16AW	16AX	16AY	16AZ
17	Loans and advances	17AW	17AX	17AY	17AZ
18	Debt securities, including UoP	18AW	18AX	18AY	18AZ
19	Equity instruments	19AW	19AX		19AZ
20	Non-financial undertakings	20AW	20AX	20AY	20AZ
21	Loans and advances	21AW	21AX	21AY	21AZ
22	Debt securities, including UoP	22AW	22AX	22AY	22AZ
23	Equity instruments	23AW	23AX		23AZ
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28AW	28AX	28AY	28AZ
29	Housing financing	29AW	29AX	29AY	29AZ
30	Local governments financing	30AW	30AX	30AY	30AZ
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AW	31AX	31AY	31AZ

**GAR003- T-1 Capex**

32	Total GAR assets	32AW	32AX	32AY	32AZ
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% (compared to total assets in the denominator)		Disclosure reference date T							
		Biodiversity and ecosystems (BIO)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
						Of which: use of proceeds		Of which: enabling	
		bb		bc		bd		be	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1BA		1BB		1BC		1BD	
2	Financial undertakings	2BA		2BB		2BC		2BD	
3	Credit institutions	3BA		3BB		3BC		3BD	
4	Loans and advances	4BA		4BB		4BC		4BD	
5	Debt securities, including UoP	5BA		5BB		5BC		5BD	
6	Equity instruments	6BA		6BB				6BD	
7	Other financial corporations	7BA		7BB		7BC		7BD	
8	Of which: investment firms	8BA		8BB		8BC		8BD	
9	Loans and advances	9BA		9BB		9BC		9BD	

## GAR003- T-1 Capex

10	Debt securities, including UoP	10BA	10BB	10BC	10BD
11	Equity instruments	11BA	11BB		11BD
12	Of which: management companies	12BA	12BB	12BC	12BD
13	Loans and advances	13BA	13BB	13BC	13BD
14	Debt securities, including UoP	14BA	14BB	14BC	14BD
15	Equity instruments	15BA	15BB		15BD
16	Of which: insurance undertakings	16BA	16BB	16BC	16BD
17	Loans and advances	17BA	17BB	17BC	17BD
18	Debt securities, including UoP	18BA	18BB	18BC	18BD
19	Equity instruments	19BA	19BB		19BD
20	Non-financial undertakings	20BA	20BB	20BC	20BD
21	Loans and advances	21BA	21BB	21BC	21BD
22	Debt securities, including UoP	22BA	22BB	22BC	22BD
23	Equity instruments	23BA	23BB		23BD
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28BA	28BB	28BC	28BD
29	Housing financing	29BA	29BB	29BC	29BD
30	Local governments financing	30BA	30BB	30BC	30BD
31	Collateral obtained by taking possession: residential and commercial immovable properties	31BA	31BB	31BC	31BD
32	Total GAR assets	32BA	32BB	32BC	32BD

GAR003- T-1 Capex

'% (compared to total assets in the denominator)		Disclosure reference date T											
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										Proportion of total covered assets	
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
				Of which: use of proceeds		Of which: transitional		Of which: enabling					
bf		bg		bh		bi		bj		bk			
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1BE		1BF		1BG		1BH		1BI		1BJ	
2	Financial undertakings	2BE		2BF		2BG		2BH		2BI		2BJ	
3	Credit institutions	3BE		3BF		3BG		3BH		3BI		3BJ	
4	Loans and advances	4BE		4BF		4BG		4BH		4BI		4BJ	
5	Debt securities, including UoP	5BE		5BF		5BG		5BH		5BI		5BJ	
6	Equity instruments	6BE		6BF				6BH		6BI		6BJ	
7	Other financial corporations	7BE		7BF		7BG		7BH		7BI		7BJ	
8	Of which: investment firms	8BE		8BF		8BG		8BH		8BI		8BJ	
9	Loans and advances	9BE		9BF		9BG		9BH		9BI		9BJ	
10	Debt securities, including UoP	10BE		10BF		10BG		10BH		10BI		10BJ	



**GAR003- T-1 Capex**

1	Equity instruments	11B E		11BF			11BH		11BI		11BJ	
1	Of which: management companies	12B E		12BF		12BG		12BH		12BI		12BJ
1	Loans and advances	13B E		13BF		13BG		13BH		13BI		13BJ
1	Debt securities, including UoP	14B E		14BF		14BG		14BH		14BI		14BJ
1	Equity instruments	15B E		15BF			15BH		15BI		15BJ	
1	Of which: insurance undertakings	16B E		16BF		16BG		16BH		16BI		16BJ
1	Loans and advances	17B E		17BF		17BG		17BH		17BI		17BJ
1	Debt securities, including UoP	18B E		18BF		18BG		18BH		18BI		18BJ
1	Equity instruments	19B E		19BF			19BH		19BI		19BJ	
2	Non-financial undertakings	20B E		20BF		20BG		20BH		20BI		20BJ
2	Loans and advances	21B E		21BF		21BG		21BH		21BI		21BJ
2	Debt securities, including UoP	22B E		22BF		22BG		22BH		22BI		22BJ
2	Equity instruments	23B E		23BF			23BH		23BI		23BJ	
2	Households	24B E		24BF		24BG		24BH		24BI		24BJ
2	Of which: loans collateralised by residential immovable property	25B E		25BF		25BG		25BH		25BI		25BJ
2	Of which: building renovation loans	26B E		26BF		26BG		26BH		26BI		26BJ
2	Of which: motor vehicle loans											
2	Local governments financing	28B E		28BF		28BG		28BH		28BI		28BJ
2	Housing financing	29B E		29BF		29BG		29BH		29BI		29BJ
3	Local governments financing	30B E		30BF		30BG		30BH		30BI		30BJ

**GAR003 - T-1 Turnover**

3	Collateral obtained by taking possession: residential and commercial immovable properties	31B E		31BF		31BG		31BH		31BI		31BJ	
3	Total GAR assets	32B E		32BF		32BG		32BH		32BI		32BJ	

**GAR003 – T-1 Turnover**

% (compared to total assets in the denominator)	Disclosure reference date T					
	Climate Change Mitigation (CCM)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which: use of proceeds	Of which: transitional	Of which: enabling	

**GAR003 - T-1 Turnover**

		ag		ah		ai		aj		ak	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AF		1AG		1AH		1AI		1AJ	
2	Financial undertakings	2AF		2AG		2AH		2AI		2AJ	
3	Credit institutions	3AF		3AG		3AH		3AI		3AJ	
4	Loans and advances	4AF		4AG		4AH		4AI		4AJ	
5	Debt securities, including UoP	5AF		5AG		5AH		5AI		5AJ	
6	Equity instruments	6AF		6AG				6AI		6AJ	
7	Other financial corporations	7AF		7AG		7AH		7AI		7AJ	
8	Of which: investment firms	8AF		8AG		8AH		8AI		8AJ	
9	Loans and advances	9AF		9AG		9AH		9AI		9AJ	
10	Debt securities, including UoP	10AF		10AG		10AH		10AI		10AJ	
11	Equity instruments	11AF		11AG				11AI		11AJ	
12	Of which: management companies	12AF		12AG		12AH		12AI		12AJ	
13	Loans and advances	13AF		13AG		13AH		13AI		13AJ	
14	Debt securities, including UoP	14AF		14AG		14AH		14AI		14AJ	
15	Equity instruments	15AF		15AG				15AI		15AJ	
16	Of which: insurance undertakings	16AF		16AG		16AH		16AI		16AJ	
17	Loans and advances	17AF		17AG		17AH		17AI		17AJ	
18	Debt securities, including UoP	18AF		18AG		18AH		18AI		18AJ	
19	Equity instruments	19AF		19AG				19AI		19AJ	
20	Non-financial undertakings	20AF		20AG		20AH		20AI		20AJ	
21	Loans and advances	21AF		21AG		21AH		21AI		21AJ	

**GAR003 - T-1 Turnover**

22	Debt securities, including UoP	22AF		22AG		22AH		22AI		22AJ	
23	Equity instruments	23AF		23AG				23AI		23AJ	
24	Households	24AF		24AG		24AH		24AI		24AJ	
25	Of which: loans collateralised by residential immovable property	25AF		25AG		25AH		25AI		25AJ	
26	Of which: building renovation loans	26AF		26AG		26AH		26AI		26AJ	
27	Of which: motor vehicle loans	27AF		27AG		27AH		27AI		27AJ	
28	Local governments financing	28AF		28AG		28AH		28AI		28AJ	
29	Housing financing	29AF		29AG		29AH		29AI		29AJ	
30	Local governments financing	30AF		30AG		30AH		30AI		30AJ	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AF		31AG		31AH		31AI		31AJ	
32	Total GAR assets	32AF		32AG		32AH		32AI		32AJ	

**GAR003 - T-1 Turnover**

'% (compared to total assets in the denominator)		Disclosure reference date T							
		Climate Change Adaptation (CCA)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		f		g		h		i	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AK		1AL		1AM		1AN	
2	Financial undertakings	2AK		2AL		2AM		2AN	
3	Credit institutions	3AK		3AL		3AM		3AN	
4	Loans and advances	4AK		4AL		4AM		4AN	
5	Debt securities, including UoP	5AK		5AL		5AM		5AN	
6	Equity instruments	6AK		6AL				6AN	
7	Other financial corporations	7AK		7AL		7AM		7AN	
8	Of which: investment firms	8AK		8AL		8AM		8AN	
9	Loans and advances	9AK		9AL		9AM		9AN	

**GAR003 - T-1 Turnover**

10	Debt securities, including UoP	10AK	10AL	10AM	10AN
11	Equity instruments	11AK	11AL		11AN
12	Of which: management companies	12AK	12AL	12AM	12AN
13	Loans and advances	13AK	13AL	13AM	13AN
14	Debt securities, including UoP	14AK	14AL	14AM	14AN
15	Equity instruments	15AK	15AL		15AN
16	Of which: insurance undertakings	16AK	16AL	16AM	16AN
17	Loans and advances	17AK	17AL	17AM	17AN
18	Debt securities, including UoP	18AK	18AL	18AM	18AN
19	Equity instruments	19AK	19AL		19AN
20	Non-financial undertakings	20AK	20AL	20AM	20AN
21	Loans and advances	21AK	21AL	21AM	21AN
22	Debt securities, including UoP	22AK	22AL	22AM	22AN
23	Equity instruments	23AK	23AL		23AN
24	Households	24AK	24AL	24AM	24AN
25	Of which: loans collateralised by residential immovable property	25AK	25AL	25AM	25AN
26	Of which: building renovation loans	26AK	26AL	26AM	26AN
27	Of which: motor vehicle loans				
28	Local governments financing	28AK	28AL	28AM	28AN
29	Housing financing	29AK	29AL	29AM	29AN
30	Local governments financing	30AK	30AL	30AM	30AN
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AK	31AL	31AM	31AN
32	Total GAR assets	32AK	32AL	32AM	32AN

**GAR003 - T-1 Turnover**

% (compared to total assets in the denominator)		Disclosure reference date T							
		Water and Marine Resources (WTR)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		ap		aq		ar		as	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1AO		1AP		1AQ		1AR	
2	Financial undertakings	2AO		2AP		2AQ		2AR	
3	Credit institutions	3AO		3AP		3AQ		3AR	
4	Loans and advances	4AO		4AP		4AQ		4AR	
5	Debt securities, including UoP	5AO		5AP		5AQ		5AR	
6	Equity instruments	6AO		6AP				6AR	
7	Other financial corporations	7AO		7AP		7AQ		7AR	
8	Of which: investment firms	8AO		8AP		8AQ		8AR	
9	Loans and advances	9AO		9AP		9AQ		9AR	
10	Debt securities, including UoP	10AO		10AP		10AQ		10AR	
11	Equity instruments	11AO		11AP				11AR	
12	Of which: management companies	12AO		12AP		12AQ		12AR	
13	Loans and advances	13AO		13AP		13AQ		13AR	
14	Debt securities, including UoP	14AO		14AP		14AQ		14AR	
15	Equity instruments	15AO		15AP				15AR	

**GAR003 - T-1 Turnover**

16	Of which: insurance undertakings	16AO	16AP	16AQ	16AR
17	Loans and advances	17AO	17AP	17AQ	17AR
18	Debt securities, including UoP	18AO	18AP	18AQ	18AR
19	Equity instruments	19AO	19AP		19AR
20	Non-financial undertakings	20AO	20AP	20AQ	20AR
21	Loans and advances	21AO	21AP	21AQ	21AR
22	Debt securities, including UoP	22AO	22AP	22AQ	22AR
23	Equity instruments	23AO	23AP		23AR
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28AO	28AP	28AQ	28AR
29	Housing financing	29AO	29AP	29AQ	29AR
30	Local governments financing	30AO	30AP	30AQ	30AR
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AO	31AP	31AQ	31AR
32	Total GAR assets	32AO	32AP	32AQ	32AR

Disclosure reference date T



**GAR003 - T-1 Turnover**

% (compared to total assets in the denominator)		Circular Economy (CE)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
				Of which: use of proceeds		Of which: enabling			
		at	au	av	aw				
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1AS	1AT	1AU	1AV				
2	Financial undertakings	2AS	2AT	2AU	2AV				
3	Credit institutions	3AS	3AT	3AU	3AV				
4	Loans and advances	4AS	4AT	4AU	4AV				
5	Debt securities, including UoP	5AS	5AT	5AU	5AV				
6	Equity instruments	6AS	6AT		6AV				
7	Other financial corporations	7AS	7AT	7AU	7AV				
8	Of which: investment firms	8AS	8AT	8AU	8AV				
9	Loans and advances	9AS	9AT	9AU	9AV				
10	Debt securities, including UoP	10AS	10AT	10AU	10AV				
11	Equity instruments	11AS	11AT		11AV				
12	Of which: management companies	12AS	12AT	12AU	12AV				
13	Loans and advances	13AS	13AT	13AU	13AV				
14	Debt securities, including UoP	14AS	14AT	14AU	14AV				
15	Equity instruments	15AS	15AT		15AV				
16	Of which: insurance undertakings	16AS	16AT	16AU	16AV				
17	Loans and advances	17AS	17AT	17AU	17AV				
18	Debt securities, including UoP	18AS	18AT	18AU	18AV				
19	Equity instruments	19AS	19AT		19AV				

**GAR003 - T-1 Turnover**

20	Non-financial undertakings	20AS		20AT		20AU		20AV	
21	Loans and advances	21AS		21AT		21AU		21AV	
22	Debt securities, including UoP	22AS		22AT		22AU		22AV	
23	Equity instruments	23AS		23AT				23AV	
24	Households	24AS		24AT		24AU		24AV	
25	Of which: loans collateralised by residential immovable property	25AS		25AT		25AU		25AV	
26	Of which: building renovation loans	26AS		26AT		26AU		26AV	
27	Of which: motor vehicle loans								
28	Local governments financing	28AS		28AT		28AU		28AV	
29	Housing financing	29AS		29AT		29AU		29AV	
30	Local governments financing	30AS		30AT		30AU		30AV	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AS		31AT		31AU		31AV	
32	Total GAR assets	32AS		32AT		32AU		32AV	

% (compared to total assets in the denominator)	Disclosure reference date T	
	Pollution Prevention and Control (PPC)	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)

**GAR003 - T-1 Turnover**

				Of which: use of proceeds		Of which: enabling	
		ax	ay	az	ba		
	GAR - Assets included in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1AW	1AX	1AY	1AZ		
2	Financial undertakings	2AW	2AX	2AY	2AZ		
3	Credit institutions	3AW	3AX	3AY	3AZ		
4	Loans and advances	4AW	4AX	4AY	4AZ		
5	Debt securities, including UoP	5AW	5AX	5AY	5AZ		
6	Equity instruments	6AW	6AX		6AZ		
7	Other financial corporations	7AW	7AX	7AY	7AZ		
8	Of which: investment firms	8AW	8AX	8AY	8AZ		
9	Loans and advances	9AW	9AX	9AY	9AZ		
10	Debt securities, including UoP	10AW	10AX	10AY	10AZ		
11	Equity instruments	11AW	11AX		11AZ		
12	Of which: management companies	12AW	12AX	12AY	12AZ		
13	Loans and advances	13AW	13AX	13AY	13AZ		
14	Debt securities, including UoP	14AW	14AX	14AY	14AZ		
15	Equity instruments	15AW	15AX		15AZ		
16	Of which: insurance undertakings	16AW	16AX	16AY	16AZ		
17	Loans and advances	17AW	17AX	17AY	17AZ		
18	Debt securities, including UoP	18AW	18AX	18AY	18AZ		
19	Equity instruments	19AW	19AX		19AZ		
20	Non-financial undertakings	20AW	20AX	20AY	20AZ		
21	Loans and advances	21AW	21AX	21AY	21AZ		
22	Debt securities, including UoP	22AW	22AX	22AY	22AZ		
23	Equity instruments	23AW	23AX		23AZ		

**GAR003 - T-1 Turnover**

24	Households						
25	Of which: loans collateralised by residential immovable property						
26	Of which: building renovation loans						
27	Of which: motor vehicle loans						
28	Local governments financing	28AW	28AX	28AY	28AZ		
29	Housing financing	29AW	29AX	29AY	29AZ		
30	Local governments financing	30AW	30AX	30AY	30AZ		
31	Collateral obtained by taking possession: residential and commercial immovable properties	31AW	31AX	31AY	31AZ		
32	Total GAR assets	32AW	32AX	32AY	32AZ		

% (compared to total assets in the denominator)	Disclosure reference date T						
	Biodiversity and ecosystems (BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which: use of proceeds		Of which: enabling	
	bb	bc		bd		be	
GAR - Assets included in both numerator and denominator							

**GAR003 - T-1 Turnover**

1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1BA		1BB		1BC		1BD	
2	Financial undertakings	2BA		2BB		2BC		2BD	
3	Credit institutions	3BA		3BB		3BC		3BD	
4	Loans and advances	4BA		4BB		4BC		4BD	
5	Debt securities, including UoP	5BA		5BB		5BC		5BD	
6	Equity instruments	6BA		6BB				6BD	
7	Other financial corporations	7BA		7BB		7BC		7BD	
8	Of which: investment firms	8BA		8BB		8BC		8BD	
9	Loans and advances	9BA		9BB		9BC		9BD	
10	Debt securities, including UoP	10BA		10BB		10BC		10BD	
11	Equity instruments	11BA		11BB				11BD	
12	Of which: management companies	12BA		12BB		12BC		12BD	
13	Loans and advances	13BA		13BB		13BC		13BD	
14	Debt securities, including UoP	14BA		14BB		14BC		14BD	
15	Equity instruments	15BA		15BB				15BD	
16	Of which: insurance undertakings	16BA		16BB		16BC		16BD	
17	Loans and advances	17BA		17BB		17BC		17BD	
18	Debt securities, including UoP	18BA		18BB		18BC		18BD	
19	Equity instruments	19BA		19BB				19BD	
20	Non-financial undertakings	20BA		20BB		20BC		20BD	
21	Loans and advances	21BA		21BB		21BC		21BD	
22	Debt securities, including UoP	22BA		22BB		22BC		22BD	
23	Equity instruments	23BA		23BB				23BD	
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								

**GAR003 - T-1 Turnover**

28	Local governments financing	28BA		28BB		28BC		28BD	
29	Housing financing	29BA		29BB		29BC		29BD	
30	Local governments financing	30BA		30BB		30BC		30BD	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31BA		31BB		31BC		31BD	
32	Total GAR assets	32BA		32BB		32BC		32BD	

'% (compared to total assets in the denominator)		Disclosure reference date T											
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										Proportion of total covered assets	
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
					Of which: use of proceeds		Of which: transitional		Of which: enabling				
			bf		bg		bh		bi		bj		
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1BE		1BF		1BG		1BH		1BI		1BJ	
2	Financial undertakings	2BE		2BF		2BG		2BH		2BI		2BJ	

**GAR003 - T-1 Turnover**

3	Credit institutions	3BE		3BF		3BG		3BH		3BI		3BJ	
4	Loans and advances	4BE		4BF		4BG		4BH		4BI		4BJ	
5	Debt securities, including UoP	5BE		5BF		5BG		5BH		5BI		5BJ	
6	Equity instruments	6BE		6BF				6BH		6BI		6BJ	
7	Other financial corporations	7BE		7BF		7BG		7BH		7BI		7BJ	
8	Of which: investment firms	8BE		8BF		8BG		8BH		8BI		8BJ	
9	Loans and advances	9BE		9BF		9BG		9BH		9BI		9BJ	
10	Debt securities, including UoP	10BE		10BF		10BG		10BH		10BI		10BJ	
11	Equity instruments	11BE		11BF				11BH		11BI		11BJ	
12	Of which: management companies	12BE		12BF		12BG		12BH		12BI		12BJ	
13	Loans and advances	13BE		13BF		13BG		13BH		13BI		13BJ	
14	Debt securities, including UoP	14BE		14BF		14BG		14BH		14BI		14BJ	
15	Equity instruments	15BE		15BF				15BH		15BI		15BJ	
16	Of which: insurance undertakings	16BE		16BF		16BG		16BH		16BI		16BJ	
17	Loans and advances	17BE		17BF		17BG		17BH		17BI		17BJ	
18	Debt securities, including UoP	18BE		18BF		18BG		18BH		18BI		18BJ	
19	Equity instruments	19BE		19BF				19BH		19BI		19BJ	
20	Non-financial undertakings	20BE		20BF		20BG		20BH		20BI		20BJ	
21	Loans and advances	21BE		21BF		21BG		21BH		21BI		21BJ	
22	Debt securities, including UoP	22BE		22BF		22BG		22BH		22BI		22BJ	
23	Equity instruments	23BE		23BF				23BH		23BI		23BJ	

**GAR003 - T-1 Turnover**

2 4	Households	24B E		24BF		24BG		24BH		24BI		24BJ	
2 5	Of which: loans collateralised by residential immovable property	25B E		25BF		25BG		25BH		25BI		25BJ	
2 6	Of which: building renovation loans	26B E		26BF		26BG		26BH		26BI		26BJ	
2 7	Of which: motor vehicle loans												
2 8	Local governments financing	28B E		28BF		28BG		28BH		28BI		28BJ	
2 9	Housing financing	29B E		29BF		29BG		29BH		29BI		29BJ	
3 0	Local governments financing	30B E		30BF		30BG		30BH		30BI		30BJ	
3 1	Collateral obtained by taking possession: residential and commercial immovable properties	31B E		31BF		31BG		31BH		31BI		31BJ	
3 2	Total GAR assets	32B E		32BF		32BG		32BH		32BI		32BJ	



**GAR004- Capex**
**GAR004 – Capex**

% (compared to total eligible asset flow)		Disclosure reference date T									
		Climate Change Mitigation (CCM)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
							Of which: use of proceeds		Of which: transitional		Of which: enabling
		a		b		c		d		e	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1A	0.00	1B		1C		1D		1E	
2	Financial undertakings	2A		2B		2C		2D		2E	
3	Credit institutions	3A		3B		3C		3D		3E	
4	Loans and advances	4A		4B		4C		4D		4E	
5	Debt securities, including UoP	5A		5B		5C		5D		5E	
6	Equity instruments	6A		6B				6D		6E	
7	Other financial corporations	7A		7B		7C		7D		7E	
8	Of which: investment firms	8A		8B		8C		8D		8E	
9	Loans and advances	9A		9B		9C		9D		9E	
10	Debt securities, including UoP	10A		10B		10C		10D		10E	
11	Equity instruments	11A		11B				11D		11E	
12	Of which: management companies	12A		12B		12C		12D		12E	
13	Loans and advances	13A		13B		13C		13D		13E	

**GAR004- Capex**

14	Debt securities, including UoP	14A		14B		14C		14D		14E	
15	Equity instruments	15A		15B				15D		15E	
16	Of which: insurance undertakings	16A		16B		16C		16D		16E	
17	Loans and advances	17A		17B		17C		17D		17E	
18	Debt securities, including UoP	18A		18B		18C		18D		18E	
19	Equity instruments	19A		19B				19D		19E	
20	Non-financial undertakings	20A		20B		20C		20D		20E	
21	Loans and advances	21A		21B		21C		21D		21E	
22	Debt securities, including UoP	22A		22B		22C		22D		22E	
23	Equity instruments	23A		23B				23D		23E	
24	Households	24A		24B		24C		24D		24E	
25	Of which: loans collateralised by residential immovable property	25A		25B		25C		25D		25E	
26	Of which: building renovation loans	26A		26B		26C		26D		26E	
27	Of which: motor vehicle loans	27A		27B		27C		27D		27E	
28	Local governments financing	28A		28B		28C		28D		28E	
29	Housing financing	29A		29B		29C		29D		29E	
30	Local governments financing	30A		30B		30C		30D		30E	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31A		31B		31C		31D		31E	
32	Total GAR assets	32A		32B		32C		32D		32E	

% (compared to total eligible asset flow)	Disclosure reference date T
	Climate Change Adaptation (CCA)
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)

**GAR004- Capex**

				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
		f		g		h		i	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1F		1G		1H		1I	
2	Financial undertakings	2F		2G		2H		2I	
3	Credit institutions	3F		3G		3H		3I	
4	Loans and advances	4F		4G		4H		4I	
5	Debt securities, including UoP	5F		5G		5H		5I	
6	Equity instruments	6F		6G				6I	
7	Other financial corporations	7F		7G		7H		7I	
8	Of which: investment firms	8F		8G		8H		8I	
9	Loans and advances	9F		9G		9H		9I	
10	Debt securities, including UoP	10F		10G		10H		10I	
11	Equity instruments	11F		11G				11I	
12	Of which: management companies	12F		12G		12H		12I	
13	Loans and advances	13F		13G		13H		13I	
14	Debt securities, including UoP	14F		14G		14H		14I	
15	Equity instruments	15F		15G				15I	
16	Of which: insurance undertakings	16F		16G		16H		16I	
17	Loans and advances	17F		17G		17H		17I	
18	Debt securities, including UoP	18F		18G		18H		18I	
19	Equity instruments	19F		19G				19I	
20	Non-financial undertakings	20F		20G		20H		20I	
21	Loans and advances	21F		21G		21H		21I	
22	Debt securities, including UoP	22F		22G		22H		22I	

**GAR004- Capex**

23	Equity instruments	23F	23G		23I	
24	Households	24F	24G	24H	24I	
25	Of which: loans collateralised by residential immovable property	25F	25G	25H	25I	
26	Of which: building renovation loans	26F	26G	26H	26I	
27	Of which: motor vehicle loans					
28	Local governments financing	28F	28G	28H	28I	
29	Housing financing	29F	29G	29H	29I	
30	Local governments financing	30F	30G	30H	30I	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31F	31G	31H	31I	
32	Total GAR assets	32F	32G	32H	32I	

% (compared to total eligible asset flow)		Disclosure reference date T							
		Water and Marine Resources (WTR)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
				Of which: use of proceeds			Of which: enabling		
		j	k	l	m				
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1J	1K	1L	1M				
2	Financial undertakings	2J	2K	2L	2M				
3	Credit institutions	3J	3K	3L	3M				
4	Loans and advances	4J	4K	4L	4M				
5	Debt securities, including UoP	5J	5K	5L	5M				

## GAR004- Capex

6	Equity instruments	6J	6K		6M
7	Other financial corporations	7J	7K	7L	7M
8	Of which: investment firms	8J	8K	8L	8M
9	Loans and advances	9J	9K	9L	9M
10	Debt securities, including UoP	10J	10K	10L	10M
11	Equity instruments	11J	11K		11M
12	Of which: management companies	12J	12K	12L	12M
13	Loans and advances	13J	13K	13L	13M
14	Debt securities, including UoP	14J	14K	14L	14M
15	Equity instruments	15J	15K		15M
16	Of which: insurance undertakings	16J	16K	16L	16M
17	Loans and advances	17J	17K	17L	17M
18	Debt securities, including UoP	18J	18K	18L	18M
19	Equity instruments	19J	19K		19M
20	Non-financial undertakings	20J	20K	20L	20M
21	Loans and advances	21J	21K	21L	21M
22	Debt securities, including UoP	22J	22K	22L	22M
23	Equity instruments	23J	23K		23M
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28J	28K	28L	28M
29	Housing financing	29J	29K	29L	29M
30	Local governments financing	30J	30K	30L	30M
31	Collateral obtained by taking possession: residential and commercial immovable properties	31J	31K	31L	31M
32	Total GAR assets	32J	32K	32L	32M

**GAR004- Capex**

% (compared to total eligible asset flow)		Disclosure reference date T							
		Circular Economy (CE)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		n		o		p		q	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1N		1O		1P		1Q	
2	Financial undertakings	2N		2O		2P		2Q	
3	Credit institutions	3N		3O		3P		3Q	
4	Loans and advances	4N		4O		4P		4Q	
5	Debt securities, including UoP	5N		5O		5P		5Q	
6	Equity instruments	6N		6O				6Q	
7	Other financial corporations	7N		7O		7P		7Q	
8	Of which: investment firms	8N		8O		8P		8Q	
9	Loans and advances	9N		9O		9P		9Q	
10	Debt securities, including UoP	10N		10O		10P		10Q	
11	Equity instruments	11N		11O				11Q	

**GAR004- Capex**

12	Of which: management companies	12N	120	12P	12Q
13	Loans and advances	13N	130	13P	13Q
14	Debt securities, including UoP	14N	140	14P	14Q
15	Equity instruments	15N	150		15Q
16	Of which: insurance undertakings	16N	160	16P	16Q
17	Loans and advances	17N	170	17P	17Q
18	Debt securities, including UoP	18N	180	18P	18Q
19	Equity instruments	19N	190		19Q
20	Non-financial undertakings	20N	200	20P	20Q
21	Loans and advances	21N	210	21P	21Q
22	Debt securities, including UoP	22N	220	22P	22Q
23	Equity instruments	23N	230		23Q
24	Households	24N	240	24P	24Q
25	Of which: loans collateralised by residential immovable property	25N	250	25P	25Q
26	Of which: building renovation loans	26N	260	26P	26Q
27	Of which: motor vehicle loans				
28	Local governments financing	28N	280	28P	28Q
29	Housing financing	29N	290	29P	29Q
30	Local governments financing	30N	300	30P	30Q
31	Collateral obtained by taking possession: residential and commercial immovable properties	31N	310	31P	31Q
32	Total GAR assets	32N	320	32P	32Q

**GAR004- Capex**

% (compared to total eligible asset flow)		Disclosure reference date T							
		Pollution Prevention and Control (PPC)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		r	s		t		u		
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1R		1S		1T		1U	
2	Financial undertakings	2R		2S		2T		2U	
3	Credit institutions	3R		3S		3T		3U	
4	Loans and advances	4R		4S		4T		4U	
5	Debt securities, including UoP	5R		5S		5T		5U	
6	Equity instruments	6R		6S				6U	
7	Other financial corporations	7R		7S		7T		7U	
8	Of which: investment firms	8R		8S		8T		8U	
9	Loans and advances	9R		9S		9T		9U	
10	Debt securities, including UoP	10R		10S		10T		10U	
11	Equity instruments	11R		11S				11U	
12	Of which: management companies	12R		12S		12T		12U	
13	Loans and advances	13R		13S		13T		13U	
14	Debt securities, including UoP	14R		14S		14T		14U	
15	Equity instruments	15R		15S				15U	
16	Of which: insurance undertakings	16R		16S		16T		16U	



**GAR004- Capex**

17	Loans and advances	17R	17S	17T	17U
18	Debt securities, including UoP	18R	18S	18T	18U
19	Equity instruments	19R	19S		19U
20	Non-financial undertakings	20R	20S	20T	20U
21	Loans and advances	21R	21S	21T	21U
22	Debt securities, including UoP	22R	22S	22T	22U
23	Equity instruments	23R	23S		23U
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28R	28S	28T	28U
29	Housing financing	29R	29S	29T	29U
30	Local governments financing	30R	30S	30T	30U
31	Collateral obtained by taking possession: residential and commercial immovable properties	31R	31S	31T	31U
32	Total GAR assets	32R	32S	32T	32U

'% (compared to total eligible asset flow)

Disclosure reference date T

Biodiversity and ecosystems (BIO)

**GAR004- Capex**

		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
						Of which: use of proceeds		Of which: enabling	
		v		w		x		z	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1V		1W		1X		1Y	
2	Financial undertakings	2V		2W		2X		2Y	
3	Credit institutions	3V		3W		3X		3Y	
4	Loans and advances	4V		4W		4X		4Y	
5	Debt securities, including UoP	5V		5W		5X		5Y	
6	Equity instruments	6V		6W				6Y	
7	Other financial corporations	7V		7W		7X		7Y	
8	Of which: investment firms	8V		8W		8X		8Y	
9	Loans and advances	9V		9W		9X		9Y	
10	Debt securities, including UoP	10V		10W		10X		10Y	
11	Equity instruments	11V		11W				11Y	
12	Of which: management companies	12V		12W		12X		12Y	
13	Loans and advances	13V		13W		13X		13Y	
14	Debt securities, including UoP	14V		14W		14X		14Y	
15	Equity instruments	15V		15W				15Y	
16	Of which: insurance undertakings	16V		16W		16X		16Y	
17	Loans and advances	17V		17W		17X		17Y	
18	Debt securities, including UoP	18V		18W		18X		18Y	
19	Equity instruments	19V		19W				19Y	
20	Non-financial undertakings	20V		20W		20X		20Y	

**GAR004- Capex**

21	Loans and advances	21V		21W		21X		21Y	
22	Debt securities, including UoP	22V		22W		22X		22Y	
23	Equity instruments	23V		23W				23Y	
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28V		28W		28X		28Y	
29	Housing financing	29V		29W		29X		29Y	
30	Local governments financing	30V		30W		30X		30Y	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31V		31W		31X		31Y	
32	Total GAR assets	32V		32W		32X		32Y	

% (compared to total eligible asset flow)	Disclosure reference date T				
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which: use of proceeds	Of which: transitional	

**GAR004- Capex**

		aa		ab		ac		ad		ae		af	
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1Z		1AA		1AB		1AC		1AD		1AE	
2	Financial undertakings	2Z		2AA		2AB		2AC		2AD		2AE	
3	Credit institutions	3Z		3AA		3AB		3AC		3AD		3AE	
4	Loans and advances	4Z		4AA		4AB		4AC		4AD		4AE	
5	Debt securities, including UoP	5Z		5AA		5AB		5AC		5AD		5AE	
6	Equity instruments	6Z		6AA				6AC		6AD		6AE	
7	Other financial corporations	7Z		7AA		7AB		7AC		7AD		7AE	
8	Of which: investment firms	8Z		8AA		8AB		8AC		8AD		8AE	
9	Loans and advances	9Z		9AA		9AB		9AC		9AD		9AE	
10	Debt securities, including UoP	10Z		10AA		10AB		10AC		10AD		10AE	
11	Equity instruments	11Z		11AA				11AC		11AD		11AE	
12	Of which: management companies	12Z		12AA		12AB		12AC		12AD		12AE	
13	Loans and advances	13Z		13AA		13AB		13AC		13AD		13AE	
14	Debt securities, including UoP	14Z		14AA		14AB		14AC		14AD		14AE	
15	Equity instruments	15Z		15AA				15AC		15AD		15AE	
16	Of which: insurance undertakings	16Z		16AA		16AB		16AC		16AD		16AE	
17	Loans and advances	17Z		17AA		17AB		17AC		17AD		17AE	

**GAR004- Capex**

1 8	Debt securities, including UoP	18Z		18AA		18AB		18AC		18AD		18AE	
1 9	Equity instruments	19Z		19AA				19AC		19AD		19AE	
2 0	Non-financial undertakings	20Z		20AA		20AB		20AC		20AD		20AE	
2 1	Loans and advances	21Z		21AA		21AB		21AC		21AD		21AE	
2 2	Debt securities, including UoP	22Z		22AA		22AB		22AC		22AD		22AE	
2 3	Equity instruments	23Z		23AA				23AC		23AD		23AE	
2 4	Households	24Z		24AA		24AB		24AC		24AD		24AE	
2 5	Of which: loans collateralised by residential immovable property	25Z		25AA		25AB		25AC		25AD		25AE	
2 6	Of which: building renovation loans	26Z		26AA		26AB		26AC		26AD		26AE	
2 7	Of which: motor vehicle loans	27Z		27AA		27AB		27AC		27AD		27AE	
2 8	Local governments financing	28Z		28AA		28AB		28AC		28AD		28AE	
2 9	Housing financing	29Z		29AA		29AB		29AC		29AD		29AE	
3 0	Local governments financing	30Z		30AA		30AB		30AC		30AD		30AE	
3 1	Collateral obtained by taking possession: residential and commercial immovable properties	31Z		31AA		31AB		31AC		31AD		31AE	
3 2	Total GAR assets	32Z		32AA		32AB		32AC		32AD		32AE	

**GAR004- Turnover**

## GAR004 – Turnover

% (compared to total eligible asset flow)		Disclosure reference date T									
		Climate Change Mitigation (CCM)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
				Of which: use of proceeds		Of which: transitional		Of which: enabling			
		a		b		c		d		e	
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1A	0.00	1B		1C		1D		1E	
2	Financial undertakings	2A		2B		2C		2D		2E	
3	Credit institutions	3A		3B		3C		3D		3E	
4	Loans and advances	4A		4B		4C		4D		4E	
5	Debt securities, including UoP	5A		5B		5C		5D		5E	
6	Equity instruments	6A		6B				6D		6E	

**GAR004- Turnover**

7	Other financial corporations	7A		7B		7C		7D		7E	
8	Of which: investment firms	8A		8B		8C		8D		8E	
9	Loans and advances	9A		9B		9C		9D		9E	
10	Debt securities, including UoP	10A		10B		10C		10D		10E	
11	Equity instruments	11A		11B				11D		11E	
12	Of which: management companies	12A		12B		12C		12D		12E	
13	Loans and advances	13A		13B		13C		13D		13E	
14	Debt securities, including UoP	14A		14B		14C		14D		14E	
15	Equity instruments	15A		15B				15D		15E	
16	Of which: insurance undertakings	16A		16B		16C		16D		16E	
17	Loans and advances	17A		17B		17C		17D		17E	
18	Debt securities, including UoP	18A		18B		18C		18D		18E	
19	Equity instruments	19A		19B				19D		19E	
20	Non-financial undertakings	20A		20B		20C		20D		20E	
21	Loans and advances	21A		21B		21C		21D		21E	
22	Debt securities, including UoP	22A		22B		22C		22D		22E	
23	Equity instruments	23A		23B				23D		23E	
24	Households	24A		24B		24C		24D		24E	
25	Of which: loans collateralised by residential immovable property	25A		25B		25C		25D		25E	
26	Of which: building renovation loans	26A		26B		26C		26D		26E	
27	Of which: motor vehicle loans	27A		27B		27C		27D		27E	
28	Local governments financing	28A		28B		28C		28D		28E	
29	Housing financing	29A		29B		29C		29D		29E	
30	Local governments financing	30A		30B		30C		30D		30E	

**GAR004- Turnover**

31	Collateral obtained by taking possession: residential and commercial immovable properties	31A		31B		31C		31D		31E	
32	Total GAR assets	32A		32B		32C		32D		32E	

% (compared to total eligible asset flow)		Disclosure reference date T									
		Climate Change Adaptation (CCA)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
						Of which: use of proceeds			Of which: enabling		
		f		g		h			i		
	GAR - Assets included in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1F		1G		1H			1I		
2	Financial undertakings	2F		2G		2H			2I		
3	Credit institutions	3F		3G		3H			3I		
4	Loans and advances	4F		4G		4H			4I		
5	Debt securities, including UoP	5F		5G		5H			5I		
6	Equity instruments	6F		6G					6I		
7	Other financial corporations	7F		7G		7H			7I		
8	Of which: investment firms	8F		8G		8H			8I		
9	Loans and advances	9F		9G		9H			9I		
10	Debt securities, including UoP	10F		10G		10H			10I		
11	Equity instruments	11F		11G					11I		
12	Of which: management companies	12F		12G		12H			12I		
13	Loans and advances	13F		13G		13H			13I		
14	Debt securities, including UoP	14F		14G		14H			14I		



**GAR004- Turnover**

15	Equity instruments	15F	15G		15I
16	Of which: insurance undertakings	16F	16G	16H	16I
17	Loans and advances	17F	17G	17H	17I
18	Debt securities, including UoP	18F	18G	18H	18I
19	Equity instruments	19F	19G		19I
20	Non-financial undertakings	20F	20G	20H	20I
21	Loans and advances	21F	21G	21H	21I
22	Debt securities, including UoP	22F	22G	22H	22I
23	Equity instruments	23F	23G		23I
24	Households	24F	24G	24H	24I
25	Of which: loans collateralised by residential immovable property	25F	25G	25H	25I
26	Of which: building renovation loans	26F	26G	26H	26I
27	Of which: motor vehicle loans				
28	Local governments financing	28F	28G	28H	28I
29	Housing financing	29F	29G	29H	29I
30	Local governments financing	30F	30G	30H	30I
31	Collateral obtained by taking possession: residential and commercial immovable properties	31F	31G	31H	31I
32	Total GAR assets	32F	32G	32H	32I

% (compared to total eligible asset flow)	Disclosure reference date T	
	Water and Marine Resources (WTR)	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)

**GAR004- Turnover**

						Of which: use of proceeds		Of which: enabling	
		j		k		l		m	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1J		1K		1L		1M	
2	Financial undertakings	2J		2K		2L		2M	
3	Credit institutions	3J		3K		3L		3M	
4	Loans and advances	4J		4K		4L		4M	
5	Debt securities, including UoP	5J		5K		5L		5M	
6	Equity instruments	6J		6K				6M	
7	Other financial corporations	7J		7K		7L		7M	
8	Of which: investment firms	8J		8K		8L		8M	
9	Loans and advances	9J		9K		9L		9M	
10	Debt securities, including UoP	10J		10K		10L		10M	
11	Equity instruments	11J		11K				11M	
12	Of which: management companies	12J		12K		12L		12M	
13	Loans and advances	13J		13K		13L		13M	
14	Debt securities, including UoP	14J		14K		14L		14M	
15	Equity instruments	15J		15K				15M	
16	Of which: insurance undertakings	16J		16K		16L		16M	
17	Loans and advances	17J		17K		17L		17M	
18	Debt securities, including UoP	18J		18K		18L		18M	
19	Equity instruments	19J		19K				19M	
20	Non-financial undertakings	20J		20K		20L		20M	
21	Loans and advances	21J		21K		21L		21M	
22	Debt securities, including UoP	22J		22K		22L		22M	
23	Equity instruments	23J		23K				23M	

**GAR004- Turnover**

24	Households						
25	Of which: loans collateralised by residential immovable property						
26	Of which: building renovation loans						
27	Of which: motor vehicle loans						
28	Local governments financing	28J	28K	28L	28M		
29	Housing financing	29J	29K	29L	29M		
30	Local governments financing	30J	30K	30L	30M		
31	Collateral obtained by taking possession: residential and commercial immovable properties	31J	31K	31L	31M		
32	Total GAR assets	32J	32K	32L	32M		

% (compared to total eligible asset flow)	Disclosure reference date T							
	Circular Economy (CE)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
					Of which: use of proceeds		Of which: enabling	
	n		o		p		q	
	GAR - Assets included in both numerator and denominator							

**GAR004- Turnover**

1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1N	10	1P	1Q
2	Financial undertakings	2N	20	2P	2Q
3	Credit institutions	3N	30	3P	3Q
4	Loans and advances	4N	40	4P	4Q
5	Debt securities, including UoP	5N	50	5P	5Q
6	Equity instruments	6N	60		6Q
7	Other financial corporations	7N	70	7P	7Q
8	Of which: investment firms	8N	80	8P	8Q
9	Loans and advances	9N	90	9P	9Q
10	Debt securities, including UoP	10N	100	10P	10Q
11	Equity instruments	11N	110		11Q
12	Of which: management companies	12N	120	12P	12Q
13	Loans and advances	13N	130	13P	13Q
14	Debt securities, including UoP	14N	140	14P	14Q
15	Equity instruments	15N	150		15Q
16	Of which: insurance undertakings	16N	160	16P	16Q
17	Loans and advances	17N	170	17P	17Q
18	Debt securities, including UoP	18N	180	18P	18Q
19	Equity instruments	19N	190		19Q
20	Non-financial undertakings	20N	200	20P	20Q
21	Loans and advances	21N	210	21P	21Q
22	Debt securities, including UoP	22N	220	22P	22Q
23	Equity instruments	23N	230		23Q
24	Households	24N	240	24P	24Q
25	Of which: loans collateralised by residential immovable property	25N	250	25P	25Q
26	Of which: building renovation loans	26N	260	26P	26Q
27	Of which: motor vehicle loans				

**GAR004- Turnover**

28	Local governments financing	28N		28O		28P		28Q	
29	Housing financing	29N		29O		29P		29Q	
30	Local governments financing	30N		30O		30P		30Q	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31N		31O		31P		31Q	
32	Total GAR assets	32N		32O		32P		32Q	

% (compared to total eligible asset flow)		Disclosure reference date T							
		Pollution Prevention and Control (PPC)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
						Of which: use of proceeds		Of which: enabling	
		r		s		t		u	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1R		1S		1T		1U	
2	Financial undertakings	2R		2S		2T		2U	
3	Credit institutions	3R		3S		3T		3U	
4	Loans and advances	4R		4S		4T		4U	

**GAR004- Turnover**

5	Debt securities, including UoP	5R		5S		5T		5U	
6	Equity instruments	6R		6S				6U	
7	Other financial corporations	7R		7S		7T		7U	
8	Of which: investment firms	8R		8S		8T		8U	
9	Loans and advances	9R		9S		9T		9U	
10	Debt securities, including UoP	10R		10S		10T		10U	
11	Equity instruments	11R		11S				11U	
12	Of which: management companies	12R		12S		12T		12U	
13	Loans and advances	13R		13S		13T		13U	
14	Debt securities, including UoP	14R		14S		14T		14U	
15	Equity instruments	15R		15S				15U	
16	Of which: insurance undertakings	16R		16S		16T		16U	
17	Loans and advances	17R		17S		17T		17U	
18	Debt securities, including UoP	18R		18S		18T		18U	
19	Equity instruments	19R		19S				19U	
20	Non-financial undertakings	20R		20S		20T		20U	
21	Loans and advances	21R		21S		21T		21U	
22	Debt securities, including UoP	22R		22S		22T		22U	
23	Equity instruments	23R		23S				23U	
24	Households								
25	Of which: loans collateralised by residential immovable property								
26	Of which: building renovation loans								
27	Of which: motor vehicle loans								
28	Local governments financing	28R		28S		28T		28U	
29	Housing financing	29R		29S		29T		29U	
30	Local governments financing	30R		30S		30T		30U	
31	Collateral obtained by taking possession: residential and commercial immovable properties	31R		31S		31T		31U	

**GAR004- Turnover**

32	Total GAR assets	32R	32S	32T	32U
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% (compared to total eligible asset flow)		Disclosure reference date T							
		Biodiversity and ecosystems (BIO)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
					Of which: use of proceeds		Of which: enabling		
		v		w		x		z	
	GAR - Assets included in both numerator and denominator								
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1V		1W		1X		1Y	
2	Financial undertakings	2V		2W		2X		2Y	
3	Credit institutions	3V		3W		3X		3Y	
4	Loans and advances	4V		4W		4X		4Y	
5	Debt securities, including UoP	5V		5W		5X		5Y	
6	Equity instruments	6V		6W				6Y	
7	Other financial corporations	7V		7W		7X		7Y	
8	Of which: investment firms	8V		8W		8X		8Y	
9	Loans and advances	9V		9W		9X		9Y	

**GAR004- Turnover**

10	Debt securities, including UoP	10V	10W	10X	10Y
11	Equity instruments	11V	11W		11Y
12	Of which: management companies	12V	12W	12X	12Y
13	Loans and advances	13V	13W	13X	13Y
14	Debt securities, including UoP	14V	14W	14X	14Y
15	Equity instruments	15V	15W		15Y
16	Of which: insurance undertakings	16V	16W	16X	16Y
17	Loans and advances	17V	17W	17X	17Y
18	Debt securities, including UoP	18V	18W	18X	18Y
19	Equity instruments	19V	19W		19Y
20	Non-financial undertakings	20V	20W	20X	20Y
21	Loans and advances	21V	21W	21X	21Y
22	Debt securities, including UoP	22V	22W	22X	22Y
23	Equity instruments	23V	23W		23Y
24	Households				
25	Of which: loans collateralised by residential immovable property				
26	Of which: building renovation loans				
27	Of which: motor vehicle loans				
28	Local governments financing	28V	28W	28X	28Y
29	Housing financing	29V	29W	29X	29Y
30	Local governments financing	30V	30W	30X	30Y
31	Collateral obtained by taking possession: residential and commercial immovable properties	31V	31W	31X	31Y
32	Total GAR assets	32V	32W	32X	32Y



**GAR004- Turnover**

'% (compared to total eligible asset flow)		Disclosure reference date T											
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										Proportion of total covered assets	
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
				Of which: use of proceeds			Of which: transitional		Of which: enabling				
aa		ab		ac		ad		ae		af			
	GAR - Assets included in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1Z		1AA		1AB		1AC		1AD		1AE	
2	Financial undertakings	2Z		2AA		2AB		2AC		2AD		2AE	
3	Credit institutions	3Z		3AA		3AB		3AC		3AD		3AE	
4	Loans and advances	4Z		4AA		4AB		4AC		4AD		4AE	
5	Debt securities, including UoP	5Z		5AA		5AB		5AC		5AD		5AE	
6	Equity instruments	6Z		6AA				6AC		6AD		6AE	
7	Other financial corporations	7Z		7AA		7AB		7AC		7AD		7AE	
8	Of which: investment firms	8Z		8AA		8AB		8AC		8AD		8AE	
9	Loans and advances	9Z		9AA		9AB		9AC		9AD		9AE	
10	Debt securities, including UoP	10Z		10AA		10AB		10AC		10AD		10AE	

**GAR004- Turnover**

1	Equity	11Z		11AA			11AC		11AD		11AE	
1	instruments											
1	Of which:	12Z		12AA		12AB		12AC		12AD		12AE
2	management companies											
1	Loans and	13Z		13AA		13AB		13AC		13AD		13AE
3	advances											
1	Debt	14Z		14AA		14AB		14AC		14AD		14AE
4	securities, including UoP											
1	Equity	15Z		15AA				15AC		15AD		15AE
5	instruments											
1	Of which:	16Z		16AA		16AB		16AC		16AD		16AE
6	insurance undertakings											
1	Loans and	17Z		17AA		17AB		17AC		17AD		17AE
7	advances											
1	Debt	18Z		18AA		18AB		18AC		18AD		18AE
8	securities, including UoP											
1	Equity	19Z		19AA				19AC		19AD		19AE
9	instruments											
2	Non-financial	20Z		20AA		20AB		20AC		20AD		20AE
0	undertakings											
2	Loans and	21Z		21AA		21AB		21AC		21AD		21AE
1	advances											
2	Debt	22Z		22AA		22AB		22AC		22AD		22AE
2	securities, including UoP											
2	Equity	23Z		23AA				23AC		23AD		23AE
3	instruments											
2	Households	24Z		24AA		24AB		24AC		24AD		24AE
4												
2	Of which: loans	25Z		25AA		25AB		25AC		25AD		25AE
5	collateralised by residential immovable property											
2	Of which:	26Z		26AA		26AB		26AC		26AD		26AE
6	building renovation loans											
2	Of which: motor	27Z		27AA		27AB		27AC		27AD		27AE
7	vehicle loans											
2	Local	28Z		28AA		28AB		28AC		28AD		28AE
8	governments financing											
2	Housing	29Z		29AA		29AB		29AC		29AD		29AE
9	financing											
3	Local	30Z		30AA		30AB		30AC		30AD		30AE
0	governments financing											

**GAR004- Turnover**

3 1	Collateral obtained by taking possession: residential and commercial immovable properties	31Z		31AA		31AB		31AC		31AD		31AE	
3 2	Total GAR assets	32Z		32AA		32AB		32AC		32AD		32AE	

# Annex I

## **Road Map**

## MAIN IMPROVEMENT CHALLENGES AND OBJECTIVES/ ENVIRONMENT

ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
Energy efficiency	Continue playing an active part in initiatives that help encourage funding for energy efficiency.	Objective achieved. As an active member of the Energy Efficient Mortgage Label (EEML) we continue to take part in its activities, publishing our half-yearly HDT report, and continuing to work on an improved template for this report.	Continue playing an active part in initiatives that encourage funding for energy efficiency.
	Maintain our financing model with all actors, including adapting to changes in regulations that may happen during the current year.	Objective achieved.	Maintain our financing model with all actors, including full adaptation to changes in regulations that may happen during the current year.
Volunteering	Continue the actions of the Forestry Plan. 700 volunteers are expected to take part, mainly in the CPEN projects and the Perdón area. An agreement is also planned (in 2024 or later) with the Fundación Albaola (Sakana), which opens up the project to students and high school children. There will be several learning/volunteering days to accompany the ATF projects with different municipalities.	Objective partly achieved. Volunteering days were held with 183 participants.	Continue the actions of the Forestry Plan. Actions are expected to include 252 volunteers.
Environmental actions in our community	We have budgeted to replant 80 hectares of land and clean 600 hectares. Also, for the first time, we will be supporting projects and infrastructure to use extensive grazing livestock to help clear scrub from the mountains. We will seek an agreement with CPEN on the Valtierra and Arguedas zone.	Objective partly achieved. The areas replanted and cleaned were smaller than budgeted. However, this was offset by new projects that emerged around actions related to extensive livestock infrastructure to conserve the land and prevent fires. A total of 447.22 hectares of forest was sustainably managed and 30.81 hectares replanted. Regarding livestock, 34,225 metres of land enclosures was supported and various improvements in corrals, pens, feeding troughs and cattle grids, In terms of financial support EUR 345,800 was contributed under the Forestry Plan. There is now enough woodland to offset the first 100 tonnes of CO2 from the CPEN wood in Lesaka.	We have plans for 760.22 hectares of managed forest, 113.41 replanted, 40,712 metres of enclosures and various improvements to livestock infrastructure. In financial terms, EUR 712,746 has been budgeted. Obtain certification for 2,000 tonnes of CO2 to offset our carbon footprint.

ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
<b>CRN carbon footprint</b>	Intranet campaign to encourage cycling, public transport and car sharing when commuting to work.	Objective not achieved Campaigns did not happen.	Renovation/efficiency improvements in insulation and aircon systems at Central Services and branches affecting at least 5% of the workforce and electricity consumption from aircon.  3% reduction in commuting footprint of employees, compared to 2024.
<b>CRN Group carbon footprint</b>	Audit the calculation of the carbon footprint and file it in the Ministerial Register. Carefully analyse the conversion factors of agricultural raw materials that make up 78% of the consolidated carbon footprint.	Objective achieved. Audit done and passed. Not yet filed in the Ministerial Register but will be soon. Conversion factors analysed ahead of calculating the HDC.	Installation of solar panels at Harivenasa.  Installation of insulation and high-efficiency air conditioning in new Solera day centre.  Optimisation of transport routes in Solera.  Promotional campaign for vehicle sharing in Harivenasa.
<b>Capital market finance</b>	If the mortgage portfolio permits, issue another sustainable or green mortgage covered bond under the sustainability framework which complies with the European Union Taxonomy.	Objective not achieved. Although the mortgage portfolio would have allowed it, the state of the markets and no need for liquidity meant we postponed the issue of a new sustainable covered bond from 2024 to 2025 (January).	If the mortgage portfolio permits, issue another sustainable or green mortgage covered bond under the sustainability framework which complies with the European Union Taxonomy.
<b>Investment products Gescooperativo funds - New products</b>	Review the need to extend the sustainable fund range.	Given our existing suitability test data and proposals for sustainable investment, we see no need to extend the range of impact funds. Demand is not very high and one fund should cover this demand.	Reassess if it is necessary to extend the range of impact funds, in light of customer demand.
<b>Investment products Gescooperativo funds - Regulatory requirements</b>	Implement the new Suitability Test sustainability module in our systems	Objective achieved.	Review any changes in regulations and if so adapt our systems accordingly.
<b>Investment products Gescooperativo funds - Marketing materials</b>	Continue the internal and public marketing actions about our sustainable funds range.	Objective not achieved. We will update the brochures for sustainable funds in the first half of 2025 and disseminate them through our sales network.	Update sustainable fund brochures and disseminate them through the branches.
<b>Investment products Pension plans and EPSV</b>	Analyse commercial demand for such pension plans and assess their marketing.	Given our existing suitability test data and proposals for sustainable investment, we see no need to extend the range of impact funds. Demand is not very high and one fund should cover this demand.	Reassess if it is necessary to extend the range of sustainable funds, in light of customer demand.
<b>Investment products PRI</b>	Assess whether it is worth signing up to these principles.	Objective achieved. The Group does not consider it necessary to sign up to these principles.	

ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
<b>Sustainable finance loans</b> <b>Own consumption</b>	Continue with the project but with less marketing drive.	Objective achieved.	Continue with the project but with less marketing drive.
<b>Sustainable mobility loans</b> <b>Electric vehicle financing</b>	Keep this financing line under review.	Objective achieved. In 2024 we ran a powerful marketing campaign on financing for cars and e-vehicles.	Maintain this financing line.
<b>Sustainable renovation loans</b> <b>Renovation financing</b>	Assess whether it is worth launching a communications drive and including social features.	Objective achieved. The option of communications with social features was assessed. The conclusion was that it was not worth it.	

## MAIN IMPROVEMENT CHALLENGES AND OBJECTIVES/ SOCIAL ISSUES

ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
<b>Financial inclusion</b>	Continue the Plan for Digital Training of Older People, making sure they are financially included and can get on with new technologies. Tailored to demand.	Objective achieved. 11 workshops were delivered in 2024.	Continue the Plan for Digital Training of Older People, making sure they are financially included and can get on with new technologies. Tailored to demand.
<b>Recognition of social contribution</b>	Continue sponsoring Awards. We also aim to take advantage of larger-scale sports and cultural events in our community, to raise the profile of social projects.	Objective achieved.	Maintain current social contribution Awards and promote new social projects in sporting and cultural events.
<b>Volunteering</b>	Continue with environmental volunteering actions and digital training for older people tailored to demand.	Objective achieved. Ran volunteer forestry programmes in Gipuzkoa and digitization workshops for older people.	Continue sharing corporate volunteering actions on the Bank intranet.  Continue with environmental volunteering actions and digital training for older people.
<b>Digitisation of schools</b>			
<b>Digitisation of social organisations</b>	Continue supporting social institutions with various digitization processes to help them become more competitive and self-sufficient.	Objective partly achieved.	Continue to support and back new digitization processes.
<b>Employability and integration to the labour market for young people</b>	We will continue the Experience Programme for young people so they can get their first work experience in the financial sector. We are expanding the programme to bring in new universities.	Objective achieved.	Continue the Experience Programme and other collaboration agreements with universities.
<b>Older people</b>	Continue to expand the range of activities on offer to bring in more people and locations.	Objective achieved.	Continue the Experience Programme and other collaboration agreements with universities.
<b>Social contribution</b>	Continue to prepare and publish the Corporate Social Responsibility Report	Objective achieved. Caja Rural de Navarra's 2024 non-financial statements sustainability report was prepared and verified by AENOR.	Continue to draw up and publish this report.
<b>Dialogue with and development of local communities</b>	In 2024, revise the materiality assessment, reopening the wide-ranging consultation to all stakeholders in Q4 2024.	Objective achieved. Caja Rural de Navarra's 2024 non-financial statements sustainability report was prepared and verified by AENOR.	In 2025, the materiality assessment of the equity investments of Caja Rural de Navarra will be rerun.



ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
<b>Investment products</b>	Assess the possibility of selecting another sustainable fund that will earmark part of its management fees to non-profit organisations working on social issues.	Objective achieved. In 2024, it was decided to add a social dimension to the selected Sustainable fund by including donations to non-profits.	Expand the approach within our range of sustainable funds, adding another fund that donates part of its fees to non-profit organisations.
<b>Introduction of the loyalty module in local businesses</b>	Assess the need for implementation.		
<b>Human resource management (equality and diversity, health and safety etc.)</b>	We will continue to roll out the actions under our Equality plan. We will continue with the diversity Group.	Objective achieved.	We will continue to roll out the actions under the Plan.
<b>Human resource management (equality and diversity, health and safety etc.)</b>	We will look into running a sporting event for staff.	Objective achieved. Company Challenge was held.	Organise a sports competition with employees.
<b>Diversity initiatives</b>	Continue with Plan measures. Continue with the diversity Group, carrying out various actions.	Objective achieved.	Continue with the Plan measures. We continued with the diversity Group, holding various actions.
<b>Equal pay</b>	Continue with Plan measures. Continue with the diversity Group, carrying out various actions.	Objective achieved.	Continue with the Plan measures. We continued with the diversity Group, holding various actions.

## MAIN IMPROVEMENT CHALLENGES AND OBJECTIVES/ ECONOMIC-FINANCIAL ANALYSIS AND CORPORATE GOVERNANCE DEVELOPMENTS

ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
<b>Training Sustainable practices</b>	We will continue training new hires in giving investment advice. We will maintain the continuous training programme for the full workforce to maintain their accreditation for advisory services.	Objective achieved.	Continue training new hires in giving investment advice. Maintain continuous training for all employees accredited to advise customers.
<b>Training</b>	We will deliver a new training programme on cybersecurity for the whole workforce.	Objective achieved.	We will deliver a new training programme on cybersecurity for the whole workforce.
<b>Working hours</b>	Continue to extract true and concrete information from data. Apply flexibility both self-managed and in collaboration with the team.	Objective achieved.	Continue to extract true and concrete information from data. Apply flexibility both self-managed and in collaboration with the team.
<b>Customer-focused services</b>	Maintain the objective of gathering data on customers' opinion of service quality, and user experience of the products and services the Bank offers.	Objective achieved. Dialogue continued with customers through the channels provided by the Bank.	Maintain the objective of gathering data on customers' opinion of service quality, and user experience of the products and services the Bank offers.
<b>Socially responsible investment</b>	Review the Sustainability Framework and update it where necessary.	Objective achieved. In 2024, we revised and updated the Sustainable Finance Framework.	Review the Sustainability Framework and update it where necessary.
	Maintain a positive Second-Party Opinion from Sustainalytics on the Sustainability Framework for issuance of sustainable bonds.	Objective achieved. The Framework was reviewed by Sustainalytics, who issued a positive Second-Party Opinion on it.	Maintain a positive Second-Party Opinion from Sustainalytics on the Sustainable Finance Framework.
	Continue the annual updates.	Objective achieved. In 2024 the energy efficiency data was updated.	Continue the annual updates.
<b>Sustainable products</b>	Continue marketing specific new products.	Objective achieved.	Continue marketing specific new products.
	Continue to adapt to the new sustainability regulations and requirements for savings investment products..	Objective achieved. Based on the best execution principle given the lack of specific regulatory guidance in several areas.	Continue to adapt to the new sustainability regulations and requirements for savings investment products.
<b>Suppliers</b>	Continue the existing approach. Copy in the compliance letter to recurrent suppliers where volumes justify it.	Objective achieved. The main suppliers publish their own CSR Report. We copied in the letter to suppliers who had not received it, mainly when contracting services.	Continue this approach. Copy in the letter to recurrent suppliers where volumes justify it.

ISSUE	OBJECTIVE 2024	DEGREE OF ACHIEVEMENT 2024	OBJECTIVE 2025
<b>Regulatory compliance, corporate governance and transparency</b>	Maintain a good ESG risk rating from Sustainalytics. Explore the ESG risk ratings offered by other agencies.	Objective achieved. In 2024 the Bank renewed its ESG risk rating obtaining an ESG risk rating of low (12.0), one of the best in the sector. We have explored the ratings of other suppliers and concluded that, for now, the current supplier is best-suited to our needs.	Analyse the ESG risk rating methodology of other agencies and see whether it might be better to contract another supplier.
	Develop the 2024 annual plan with special focus on the following projects: ATENEA (training); Radar 360 (new regulatory watch); central Compliance (optimisation of Compliance model) and creation of a new ESG Compliance section.	Objective achieved. Except in launching the new ESG section, which is planned to come onstream in 2025.	Prepare the 2025 annual plan with special focus on the following projects: Complete the process of creating a new ESG compliance section; Launch the documentary management project; Launch the new incident manager and neuronal project that makes it possible to interlink the various compliance engines that are being introduced.
			At the election to be held at the 2025 General Meeting, the aim is to have new female directors elected to the Governing Board, such that we achieve the regulatory requirement of 6 of the less-represented gender by 2029.
	Continue calculating trends and volatility so as to define thresholds and targets for the future	Objective achieved. Completed with year-end data.	Continue calculating trends and volatility so as to define thresholds and targets for the future
	Publish the GAR in the non-financial statements with end-2023 data.	Objective achieved. Ratios published in non-financial statements based on end-2023 data.	Publish the GAR in the non-financial statements with end-2024 data.

# Annex XI

**Aenor**

# AENOR

## Informe de Verificación

para

## CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO

relativo a la información no financiera consolidada y a la información sobre sostenibilidad **EINF 2024 Grupo Caja Rural Navarra Informe Sostenibilidad** conforme la Ley 11/2018 y la Directiva (UE) 2022/2464 correspondiente al ejercicio anual finalizado el 31 de Diciembre de 2024.

En Madrid a 7 de mayo de 2025



Rafael García Meiro  
CEO

# AENOR

INFORME DE VERIFICACIÓN LIMITADA EMITIDO POR UN VERIFICADOR SOBRE EL ESTADO DE INFORMACIÓN NO FINANCIERA CONSOLIDADO E INFORMACIÓN SOBRE SOSTENIBILIDAD

## INFORME DE VERIFICACIÓN LIMITADA SOBRE EL ESTADO DE INFORMACIÓN NO FINANCIERA CONSOLIDADO E INFORMACIÓN SOBRE SOSTENIBILIDAD

A la Junta General de Accionistas de CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO:

### CONCLUSIÓN DE VERIFICACIÓN LIMITADA

De acuerdo con la Ley 11/2018 AENOR ha realizado la verificación, bajo un nivel de aseguramiento limitado del Estado de Información No Financiera Consolidado (en adelante EINF) correspondiente al ejercicio anual finalizado el 31 de Diciembre de 2024 de CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO y sociedades dependientes que forma parte del informe de gestión consolidado del Grupo (en adelante la entidad) que se incluye en el apartado **EINF 2024 Grupo Caja Rural Navarra Informe Sostenibilidad** del informe de gestión.

El contenido del EINF incluye información adicional a la requerida por la normativa vigente en materia de información no financiera, en concreto incluye la Información sobre Sostenibilidad preparada por la entidad correspondiente al ejercicio anual terminado el 31 de diciembre de 2024 (en adelante la información sobre sostenibilidad) siguiendo lo establecido en la Directiva (UE) 2022/2464 sobre Información Corporativa en Materia de Sostenibilidad (CSRD, por sus siglas en inglés). Dicha información sobre sostenibilidad también ha sido objeto de verificación bajo un nivel de aseguramiento limitado.

Basándonos en los procedimientos realizados y en las evidencias que hemos obtenido, no ha llegado a nuestro conocimiento ninguna cuestión que nos lleve a pensar que:

- El estado de Información No Financiera de la entidad correspondiente al ejercicio finalizado el 31 de Diciembre de 2024 no ha sido preparado, en todos sus aspectos significativos, de acuerdo con los contenidos recogidos en la normativa vigente y siguiendo los criterios seleccionados de las Normas Europeas de Información sobre Sostenibilidad (NEIS o ESRS por sus siglas en inglés), así como aquellos otros criterios descritos de acuerdo a lo mencionado para cada materia en el "Anexo III - Relación Ley 11/2018 y CSRD y Anexo VII - Datos específicos de la Ley 11/2018" del citado Estado;
- la información sobre sostenibilidad en su conjunto no ha sido preparada, en todos los aspectos significativos, de conformidad con el marco de información sobre sostenibilidad aplicable que se identifica en la nota "NEIS 2. Información General [BP-1] Bases para la elaboración del Informe" de la información sobre sostenibilidad adjunta, incluyendo:
  - Que la descripción proporcionada del proceso para identificar la información sobre sostenibilidad incluida en la nota "NEIS 2. Información General [BP-1] Bases para la elaboración del Informe" de la información sobre sostenibilidad es coherente con el proceso implantado y que permite identificar la información material a ser revelada según las prescripciones de las NEIS.
  - El cumplimiento de las NEIS.
  - El cumplimiento de los requisitos de divulgación, incluidos en el apartado "NEIS E1-7. Subsección "Información del Reglamento de Taxonomía de la UE (2020/852)" de la sección sobre medio ambiente de la información sobre sostenibilidad con lo establecido en el artículo 8 del

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Reglamento (UE) 2020/852, del Parlamento Europeo y del Consejo, de 18 de junio de 2020, relativo al establecimiento de un marco para facilitar las inversiones sostenibles.

### FUNDAMENTOS DE LA CONCLUSIÓN

AENOR ha realizado el encargo de verificación bajo un nivel de aseguramiento limitado de conformidad con la normativa reguladora de la actividad de verificación aplicable en España. La extensión de los procedimientos aplicados en un encargo de verificación con un nivel de aseguramiento limitado es menor en comparación con los que se requieren en un encargo de verificación razonable. En consecuencia, el grado de seguridad que se obtiene en un encargo de verificación con un nivel de aseguramiento limitado es menor que el grado de seguridad que se hubiera obtenido si se hubiera realizado un encargo de seguridad razonable.

Nuestras responsabilidades de acuerdo con dicha normativa se describen con más detalle en la sección Responsabilidades del verificador de nuestro informe

AENOR actúa como entidad de verificación independiente y cumple con los requerimientos de independencia y demás requerimientos de ética, que son aplicables según lo exigido por la normativa reguladora de la actividad de verificación de la información sobre sostenibilidad y que están basados en los principios fundamentales de integridad, objetividad, competencia y diligencia profesionales, confidencialidad y comportamiento profesional.

AENOR dispone de un sistema de gestión de la calidad que asegura el cumplimiento de lo previsto en la normativa reguladora de la actividad de verificación de la información sobre sostenibilidad respecto al control de calidad basado en la ISO/IEC 17029:2019 que requiere que el verificador individual/la sociedad de verificación diseñe, implante y opere un sistema de gestión de la calidad que incluya políticas y procedimientos relativos al cumplimiento de los requerimientos de ética, normas profesionales y requerimientos legales y reglamentarios aplicables.

Consideramos que la evidencia que hemos obtenido es suficiente y adecuada para proporcionar una base sobre la que sustentar nuestra conclusión

### PÁRRAFO DE ÉNFASIS

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### PÁRRAFO DE OTRAS CUESTIONES

Es el primer año que se reporta la información de sostenibilidad conforme a CSRD.

### RESPONSABILIDADES DE LOS ADMINISTRADORES Y DE LA COMISIÓN DE AUDITORÍA EN RELACIÓN CON LA INFORMACIÓN SOBRE SOSTENIBILIDAD

La formulación del EINF incluido en el informe de gestión consolidado de la entidad, así como el contenido del mismo, es responsabilidad de los Administradores de CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO. El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa vigente y siguiendo los criterios de las NEIS seleccionados, así como aquellos otros criterios descritos de acuerdo a lo mencionado para cada

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materia en la tabla el apartado "Anexo III - Relación Ley 11/2018 y CSRD y Anexo VII - Datos específicos de la Ley 11/2018" del citado Estado.

Esta responsabilidad incluye asimismo el diseño, la implantación y el mantenimiento del control interno que se considere necesario para permitir que el EINF esté libre de incorrección material, debida a fraude o error.

Los administradores de CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO son también responsables de definir, implantar, adaptar y mantener los sistemas de gestión de los que se obtiene la información necesaria para la preparación del EINF.

En relación con la información sobre sostenibilidad, los administradores de la entidad son responsables de desarrollar e implantar un proceso para identificar la información que se debe incluir en la información sobre sostenibilidad de conformidad con el contenido de la CSRD, de las NEIS y con lo establecido en el artículo 8 del Reglamento (UE) 2020/852, del Parlamento Europeo y del Consejo, de 18 de junio de 2020 y de divulgar información sobre este proceso en la propia información sobre sostenibilidad en el apartado "NEIS 2. Información General. Gobierno-1: El papel de los órganos de administración, dirección y supervisión". Dicha responsabilidad incluye:

- conocer el contexto en el que se desarrollan las actividades y relaciones de negocio de la entidad, así como sus grupos de interés, en relación con los impactos que tiene la entidad sobre las personas y el medio ambiente;
- identificar los impactos reales y potenciales (tanto negativos como positivos), así como los riesgos y oportunidades que podrían afectar, o de los que razonablemente se podría esperar que afecten, a la situación financiera, los resultados financieros, los flujos de efectivo, el acceso a la financiación o el coste de capital de la entidad en el corto, medio o largo plazo;
- evaluar la materialidad de los impactos, riesgos y oportunidades identificados,
- realizar hipótesis y estimaciones que sean razonables en función de las circunstancias.

Los administradores son asimismo responsables de la preparación de la información sobre sostenibilidad, que incluya la información identificada por el proceso, de conformidad con el marco de información sobre sostenibilidad aplicable, incluyendo el cumplimiento de las NEIS, el cumplimiento de los requisitos de divulgación y el artículo 8 del Reglamento (UE) 2020/852, del Parlamento Europeo y del Consejo, de 18 de junio de 2020, relativo al establecimiento de un marco para facilitar las inversiones sostenibles.

Esta responsabilidad incluye:

- Diseñar, implantar y mantener el control interno que los administradores consideren relevante para permitir la preparación de la información sobre sostenibilidad que esté libre de incorrecciones materiales, debidas a fraude o error.
- Seleccionar y aplicar métodos apropiados para la presentación de información sobre sostenibilidad y la realización de asunciones y estimaciones que sean razonables, considerando las circunstancias, sobre las divulgaciones específicas.

La comisión de auditoría es responsable de la supervisión de la elaboración y presentación de la información sobre sostenibilidad.

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LIMITACIONES INHERENTES EN LA PREPARACIÓN DE LA INFORMACIÓN SOBRE SOSTENIBILIDAD
<p>De acuerdo con las NEIS los administradores de la entidad están obligados a preparar información prospectiva sobre la base de asunciones e hipótesis, que han de incluirse en la información sobre sostenibilidad, acerca de hechos que pueden ocurrir en el futuro, así como posibles acciones futuras que, en su caso, podría tomar la compañía. El resultado real puede diferir de forma significativa del estimado, ya que se refiere al futuro y los acontecimientos futuros frecuentemente no ocurren como se esperaba.</p> <p>Para determinar las revelaciones de la información sobre sostenibilidad, los administradores de la entidad interpretan términos legales y de otro tipo que no se encuentran claramente definidos que pueden ser interpretados de forma diferente por otras personas, incluyendo la conformidad legal de dichas interpretaciones y, en consecuencia, están sujetas a incertidumbre.</p>
RESPONSABILIDADES DEL VERIFICADOR
<p>Los objetivos de AENOR son planificar y realizar el encargo de verificación con el fin de obtener una seguridad limitada sobre si el EINF y la información sobre sostenibilidad está libre de incorrección material, ya sea debida a fraude o error, y emitir un informe de verificación con un nivel de aseguramiento limitado que contiene nuestras conclusiones al respecto. Las incorrecciones pueden deberse a fraude o error y se consideran materiales si, individualmente o de forma agregada, puede preverse razonablemente que influirán en las decisiones que los usuarios a quienes se destina el informe de verificación toman basándose en esta información.</p> <p>Como parte de un encargo de verificación con nivel de aseguramiento limitado, aplicamos nuestro juicio profesional y mantenemos una actitud de escepticismo profesional durante todo el encargo. También:</p> <ul style="list-style-type: none"><li>• Diseñamos y aplicamos procedimientos para evaluar si el proceso para identificar la información que se incluye en la información que se incluye tanto en el EINF como en la información sobre sostenibilidad es congruente con la descripción del proceso seguido por la entidad y permite, en su caso, identificar la información material a ser revelada según las prescripciones de las NEIS.</li><li>• Aplicamos procedimientos sobre el riesgo, incluido obtener un conocimiento de los controles internos relevantes para el encargo con el fin de identificar la información a revelar en la que es más probable que surjan incorrecciones materiales, debido a fraude o error, pero no con la finalidad de proporcionar una conclusión acerca de la eficacia del control interno de la entidad.</li><li>• Diseñamos y aplicamos procedimientos que responden a las divulgaciones contenidas tanto en el EINF como en la información sobre sostenibilidad en las que es probable que surjan incorrecciones materiales. El riesgo de no detectar una incorrección material debida a fraude es más elevado que en el caso de una incorrección material debida a error, ya que el fraude puede implicar colusión, falsificación, omisiones deliberadas, manifestaciones intencionalmente erróneas o la elusión del control interno.</li><li>• También proporcionamos a la comisión de auditoría de la entidad una declaración de que hemos cumplido los requerimientos de ética relativos a independencia y nos hemos comunicado con la misma para informar de aquellas cuestiones que razonablemente puedan suponer una amenaza para</li></ul>

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nuestra independencia y, en su caso, de las medidas de salvaguarda adoptadas para eliminar o reducir la amenaza.
RESUMEN DEL TRABAJO REALIZADO
<p>Un encargo de verificación limitada incluye la realización de procedimientos para obtener evidencia que sirva de base para nuestras conclusiones. La naturaleza, momento de realización y extensión de los procedimientos seleccionados depende del juicio profesional, incluida la identificación de la información a revelar en que es probable que surjan incorrecciones materiales, debido a fraude o error, en la información sobre sostenibilidad.</p> <p>Nuestro trabajo ha consistido en la formulación de preguntas a la dirección, así como a las diversas unidades y componentes de CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO que han participado en la elaboración de la información sobre sostenibilidad, en la revisión de los procesos para recopilar y comprobar la información presentada en la información sobre sostenibilidad y en la aplicación de ciertos procedimientos analíticos y pruebas de revisión por muestreo, que se describen a continuación:</p> <p>En relación con el proceso de verificación del EINF:</p> <ul style="list-style-type: none"><li>• Reuniones con el personal de la entidad para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con esas cuestiones y obtener la información necesaria para la revisión externa.</li><li>• Análisis del alcance, relevancia e integridad de los contenidos incluidos en el EINF del ejercicio 2024 en función del análisis de materialidad realizado por la entidad y descrito en el apartado "NEIS 2. Información General. Gestión de incidencias, riesgos y oportunidades Gestión de incidencias, riesgos y oportunidades", considerando contenidos requeridos en la normativa en vigor.</li><li>• Análisis de los procesos para recopilar y validar los datos presentados en el EINF del ejercicio 2024.</li><li>• Revisión de la información relativa a los riesgos, las políticas y los enfoques de gestión aplicados en relación con los aspectos materiales presentados en el EINF del ejercicio 2024.</li><li>• Comprobación, mediante pruebas, en base a la selección de una muestra, de la información relativa a los contenidos incluidos en el EINF del ejercicio 2024 y su adecuada compilación a partir de los datos suministrados por las fuentes de información.</li></ul> <p>En relación con el proceso de verificación de la información sobre sostenibilidad:</p> <ul style="list-style-type: none"><li>• Entrevistas con el personal de CAJA RURAL DE NAVARRA, S. COOP. DE CREDITO.<ul style="list-style-type: none"><li>◦ para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con estas cuestiones y obtener información necesaria para la revisión externa.</li><li>◦ con el fin de conocer el origen de la información utilizada por la dirección (por ejemplo, la interacción con los grupos de interés, los planes de negocio y los documentos de estrategia); y la revisión de la documentación interna de la entidad sobre su proceso; y</li></ul></li><li>• Obtención, a través de entrevistas con el personal de la entidad, del conocimiento de los procesos de la entidad de recopilación, validación y presentación de información relevantes para la elaboración de su información sobre sostenibilidad.</li></ul>

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- Evaluación de la concordancia de la evidencia obtenida de nuestros procedimientos sobre el proceso implantado por la entidad para la determinación de la información que debe incluirse en la información sobre sostenibilidad con la descripción del proceso que se expone en la nota "NEIS 2. Información General [BP-1] Bases para la elaboración del Informe" así como evaluación de si el citado proceso implantado por la entidad permite identificar la información material a ser revelada según las prescripciones de las NEIS.
- Evaluación de si toda la información identificada en el proceso implantado por la entidad para la determinación de la información que debe incluirse en la información sobre sostenibilidad está efectivamente incluida.
- Evaluación de la concordancia de la estructura y la presentación de la Información sobre sostenibilidad con lo dispuesto en las NEIS y el resto del marco normativo de Información sobre sostenibilidad aplicado por la entidad.
- Realización de indagaciones al personal pertinente y procedimientos analíticos sobre información divulgada en la información sobre sostenibilidad considerando aquella en la que es probable que surjan incorrecciones materiales, debido a fraude o error.
- Realización de procedimientos sustantivos por muestreo sobre información divulgada en la información sobre sostenibilidad seleccionada considerando aquella en la que es probable que surjan incorrecciones materiales, debido a fraude o error.
- Obtención, en su caso, de los informes emitidos por terceros independientes acreditados anexos al informe de gestión en respuesta a exigencias de la normativa europea y, en relación con la información a la que se refieren y de acuerdo con la norma de verificación, comprobación, exclusivamente, de la acreditación del verificador y de que el alcance del informe emitido se corresponde con el exigido por la normativa europea.
- Obtención, en su caso, de los documentos que contengan la información incorporada por referencia, los informes emitidos por auditores o verificadores sobre dichos documentos y, de acuerdo con la norma de verificación, comprobación, exclusivamente, de que, en el documento al que se refiere la información incorporada por referencia, se cumplen las condiciones descritas en las NEIS para poder incorporar información por referencia en la Información sobre Sostenibilidad.
- Obtención de una carta de manifestaciones de la dirección y de los administradores de la entidad en relación con el EINF y la información sobre sostenibilidad.

#### OTRA INFORMACIÓN

Las personas encargadas del gobierno de la entidad son responsables de la otra información. La otra información comprende las cuentas anuales consolidadas y resto de la información incluida en el informe de gestión, pero no incluye ni el informe de auditoría de las cuentas anuales ni los informes de verificación emitidos por terceros independientes acreditados exigidos por el derecho de la Unión Europea sobre divulgaciones concretas contenidas en la información sobre sostenibilidad y que figuran como anexo del informe de gestión consolidado.

Este informe de verificación no cubre la otra información y no expresamos ningún tipo de conclusión de verificación sobre esta.

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En relación con nuestro encargo de verificación de la información sobre sostenibilidad, nuestra responsabilidad consiste en leer la otra información identificada anteriormente y, de este modo, considerar si la otra información presenta incongruencias materiales con la información sobre sostenibilidad o con el conocimiento que hemos adquirido durante el encargo de verificación que pudieran ser indicativas de la existencia de incorrecciones materiales en la información sobre sostenibilidad.

**AENOR CONFÍA S.A.U.**

**Maider VILLANUEVA ALDAYA (verificador jefe)**

**Fecha del informe de verificación: 2025-05-07.**

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