

Argenta Bank- en Verzekeringsgroep

Integrated 2024 annual report





Argenta makes banking and insurance simple for families and small businesses, empowering them to make informed choices about improving their financial health.





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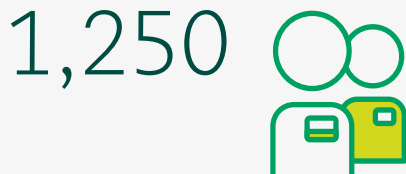
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Key figures

Number of customers:



Number of employees:



Customer satisfaction:



Net profit:



Number of branches:



Return on equity:

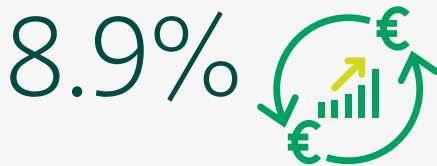


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Foreword

Dear Reader,

First and foremost, thank you for the trust you have placed in us in 2024. That may seem like a platitude, but trust is not something to be taken for granted in this day and age. On a daily basis, we are bombarded with news and facts – or what seem to be facts. So it is sometimes difficult to distinguish what is real and reliable from what is fake and unreliable.

In the unpredictable and volatile world in which we live and work, Argenta stands for simplicity and proximity and for long-term thinking. As a responsible bank, we look at the world around us with an open mind and make informed choices so that we can

sustainably make a difference for people, employees and society.

It is an approach that pays off and one for which we are recognised by our customers and the outside world. As proof, you only need to look at the various awards we received last year, including the award for Best Bank from consumer organisation Testaankoop as well as from the financial products guide Spaargids. Our commercial and financial results are likewise impressive. The increase in our mortgage production and the growth in asset management income are clear indicators of our commercial strength. We are also particularly proud of our solid solvency and liquidity positions, which further

underline Argenta's financial robustness now and in the future.

In this respect, I would like to express my thanks and appreciation for the hard work and dedication of all our employees, who have worked tirelessly to put our family values into our services, day in, day out.

Argenta has been charting its own course since it was founded in 1956 – not swayed by any trends. Simplicity and proximity are the key to our success and we are not veering away from this approach as we head towards our 100 years of business. What are we ultimately aiming to achieve from this? To make banking and insurance simple for families and small businesses, empowering them to make informed choices about improving their financial health.

So what is it that gives us the edge in this area in particular? As a bank with corporate social responsibility, we make a difference in the following specific areas:

- First of all, it is important to Argenta that we **provide our customers with the right advice**, especially at crucial moments in their lives. It is no accident that we have a branch network with branch managers and qualified staff who are able to give precisely this personal advice. Advice that is high quality and people-centred, while retaining all simplicity.
- **Argenta contributes to the financing of the economy**: the core of our financial activities still involves transforming deposits into loans for private individuals, families and businesses alike. We





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use our own investment portfolio to co-invest in tangible and local projects.

- **Argenta supports citizens as they switch over to the digital age:** society is becoming increasingly digitalised, and the same applies to banking and insurance services. Consumer protection is our top priority. So we also put our customers’ interests first in our rules of integrity and conduct. We are very aware that not everyone is digitally literate. So bridging the digital gap as much as possible is a significant challenge. We do it by making our digital channels as accessible as possible: using the right colours and fonts can make a huge difference for visually impaired customers. We also continue to focus on our human channels: our contact centre and branches are in a unique position to support these customers and explain things to them.

‘The integrity of Argenta and the integrity of its employees are inextricably linked.’

- **Argenta safeguards its customers’ data:** we are responsible for delivering secure services via our digital channels. Data privacy and security are essential in this respect. We are committed to increasing the vigilance of our staff and branches and to taking measures to protect our customers. Above all, we actively provide our customers with extensive and accessible information on the possible risks of phishing and how to identify phishing

attacks. Internally too, we devote a great deal of attention to making our own staff aware of the risks associated with cyber security and ensuring they stay alert.

- **Argenta contributes to compliance with laws and regulations within the banking and insurance sector,** for example in combating financial crime, fraud, money-laundering practices and terrorist financing. The integrity of Argenta and the integrity of its employees are inextricably linked. A responsible bank expects all its employees to be responsible as well. So we also actively focus on the awareness of possible conflicts of interest and personal integrity of our staff.

Later in this annual report, we will go into greater detail about our efforts in the field of sustainability, more specifically about the environmental, social and governance aspects of sustainability.

We want to be sustainable in everything we do. Not because that is what laws or regulations prescribe, but because it is in our DNA. We feel this responsibility, which lies at the heart of the organisation at Argenta. Responsibility that binds us together and makes us unique. Not just in our literature, but through our actual actions as well, we work to achieve satisfied customers, happy employees and healthy, long-term business results. Taking responsibility is an integral part of our long-term vision. A quality that Argenta will uphold for many generations to come. It’s as easy as that.

Marc van Heel
Chair of the Board of Directors





About Argenta

For nearly 70 years now, Argenta has been charting its own, really consistent course. In our approach, we are building on strengths we have enjoyed for years now: ensuring proximity to our customers with a focus on people and transparency. Together, for customers, in all simplicity. In a nutshell, that is what Argenta stands for and opts for. The future is unpredictable and the world is changing with increasing speed. But one thing we know for sure: in 2024, Argenta resolutely continued to put its customers first.



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In an unpredictable world, Argenta is doing what is exceptional in the financial sector: taking care of customers, staff, branches and society in a thoroughly responsible manner, in conjunction with the shareholders, to ensure they are better able to meet the financial challenges of this unpredictable world.

Top marks for Argenta

Our emphasis on simplicity and customer focus never end. Each year, we set the bar higher. And customers and professionals evidently appreciate this approach. Argenta scores well in the field of customer experience, service delivery and brand positioning, and has won awards in these areas too.

- In a survey conducted by Kantar, a leading international market research company, Argenta scored the highest out of 64 brands in all categories based on **customer experience**.
- In the **Best Brand Awards**, Argenta leapt impressively from fifth to first place in the ‘Insurance and Financial Services’ category.
- And for the fourth consecutive year, Argenta has been voted **Best Bank** by **Testaankoop**. Argenta was found to be the best bank if you opt for a combination of current account, savings account, pension savings, mortgage loan and consumer credit. In reaching its decision, Testaankoop also took customer satisfaction and the number of recorded complaints into consideration.
- Following its annual tradition, Spaargids presented its **Bank Awards** in early December. In these awards too, Argenta was rewarded for all its efforts. Argenta won the Best Branch Network as well as Best Bank awards.



Together

Argenta’s warm corporate culture is affirmed by employees who have been working for Argenta for a long time as well as those who have only recently joined. Argenta can only grow by letting its people – its talents – grow. Conversely, the talents can grow only if we grow as an organisation. This is why we invest in committed employees who are ambassadors for Argenta. We call them ‘Argentans’. It is our ambition to support, strengthen, involve and inspire our Argentans.

That way, we will deliver strong results and create added value together. We promote Argenta actively and are proud of what we achieve for our customers. Sound growth, that is our focus. Our employees have faith in Argenta and identify strongly with Argenta’s purpose. Their commitment makes us strong. In the most recent Employee Opinion Survey (EOS) carried out in early 2024, we achieved a commitment score in Belgium of no less than 91% and an eNPS (ambassadorship) of +41. The corresponding scores in the Netherlands are 88% and +25 respectively. The eNPS is a score of between -100 and +100 and indicates the extent to which Argenta employees would recommend the company as an employer to family or friends.

Argenta is actively committed to initiatives that create connectedness. In the meantime, homeworking is now well established and nearly all meetings can be conducted as a hybrid arrangement with remote and in-person participants. Having said that, we see the added value of informal discussions and colleagues meeting each other face to face.



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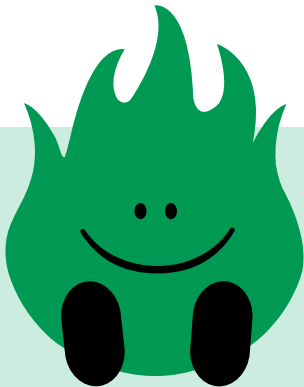


Warm Argenta

Argenta employees wanting to organise activities for charity have been doing so since 2018 under the banner of ‘Warm Argenta’. Warm Argenta has since become a huge success, raising an average of EUR 50,000 each year. Warm Argenta is a great initiative, providing welcome support to a number of charitable causes. We organise all sorts of activities as part of Warm Argenta. They also provide an opportunity for colleagues to get together and come to know each other in a different setting than the daily work routine.

An impressive EUR 55,000 was again recorded in 2024. But it is not always money that is collected.

For example, the campaign to collect toys, winter clothing and stationery in aid of the Fedasil Deurne reception centre was a huge success. In spring, we collected fifty or so pairs of glasses for the ‘Brillenatelier’ at the Circuit Antwerp hub, an initiative supported by recycling hub Kringwinkel Antwerpen. The Brillenatelier recycles used glasses and then sells them at an affordable price. Argenta also sponsors two therapy dogs, Sam and Dribbel, at the Emmaüs youth welfare organisation which provides temporary accommodation for children and young people from 12 to 20 years of age who are no longer able live at home.



For customers

Customers take centre stage, now more than ever. We aim to deliver services geared to their needs. In Belgium, we work on the basis of four propositions to ensure everything runs smoothly in this respect: Family & Protection, Home, Wealth and Business. Our propositions in the Netherlands are Savings and Home.

Based on these propositions, we can gear our services to the specific needs of our customers in each case: customers need to access easy banking and to protect their family, to live in, rent or renovate their homes, to build on their wealth; and we, as a business, need to properly manage the finances of their company with expert support. Our branch network and back office are fully furnished with these needs in mind. In this way, we can really listen to a customer and respond to their priorities within a logical group of services and products.

BELGIUM
Family & Protection

Argenta offers payment solutions for private individuals within the scope of easy banking, in line with customer needs and at fair, transparent prices. We focus much of our attention on keen and clear pricing, with no hidden charges. If our customers want to ensure their financial security and that of their family, savings are an obvious option to consider. Savings accounts therefore form a key component of what we offer.

The Argenta app and Argenta internet banking were designed with customer needs in mind. Based on feedback from customers and targeted surveys, we are continuously improving user experience. With clear interfaces and intuitive operation, it is very easy for our customers to pay their bills and manage their accounts, obtain an insurance quote or submit a claim.

Instalment loans can help our customers deal with unexpected expenses and manage their finances. Our instalment loans offer a flexible and reliable solution tailored to the needs of our customers – whether the funds are to support sustainable mobility, such as buying an electric car, or to meet other personal goals.

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Savings accounts

Argenta is ready to protect customers against all kinds of risks within the family, home or mobility. Argenta Assuranties can provide non-life and health insurance policies (motor, fire and family insurance) and manages a portfolio of hospitalisation insurance policies.



Motor insurance



Fire insurance



Family insurance



Instalment loan

Home

As a bank, Argenta fulfils a social role in the context of the 2050 climate objectives and in support of families and private individuals in their housing needs. Sustainable living is becoming increasingly important for our customers. They prefer a personalised approach supported by local branch managers. Argenta also helps private individuals protect themselves against risks associated with an investment, such as buying a property or taking out a renovation loan. We do that by providing them with the relevant information and offering them suitable insurance products. The renovation scan gives customers a clearer idea of the options available for sustainable renovation work. They are then able to better assess the cost price and benefit of specific sustainable renovations for their own home or a property in which they are interested.



Mortgage loan



Renovation loan



Outstanding balance insurance and
Temporary insurance on death

Wealth

Customers can purchase or invest in a life insurance policy from Argenta with complete peace of mind. They can then build up and manage their wealth for the future. Or they can save for later, for example to continue enjoying life after they have retired and secure the future for their loved ones once they themselves are no longer around. Anyone investing with Argenta can choose from a complete and versatile investment product range that is at the same time simple and transparent. Customers invest in one of the five Argenta core funds, in line with their risk profile and needs. They can additionally add accent funds according to their preferences. We have a solution for any risk appetite, while keeping consumer protection in mind. Customers are given investment advice via the branches, but can also perform transactions on their own initiative via the app or internet banking. With a life insurance policy from Argenta, customers are investing with complete peace of mind, protecting what is important to them and building a worry-free future for themselves and their close ones.

Our intention when forming our product range and the associated features is not to lure people with temporary prices or offers. Argenta is a healthy bank for all its customers and will remain so in the future. For example, when the yield on government bonds dropped in 2023, we set up a competitive alternative with our own term deposits with a range of maturities.

Eenmalig stunts?

DOEN WE NIET.

Elke dag tot het uiterste gaan voor al onze klanten?

DOEN WE WEL.



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Term deposits



Investment



Wealth transfer

Business

The goal of the Business proposition is to place a full range of products on the market, which support sole proprietorships and small businesses in achieving their financial needs. We manage the wealth of our professional customers by adopting a 720°-approach: 360° private and 360° professional. We take their wishes and needs into account at a professional AND private level. In doing so, we focus on requirements close to those of our retail customers, such as investment advice. And we obviously also offer the usual banking and insurance solutions based on their needs. Small businesses really appreciate personal contact with their banker. Argenta is therefore in a unique position to make a difference on the basis of its purpose. Argenta intends to stand out from the field by focusing on simplicity and proximity.

THE NETHERLANDS

Savings

We believe it is important that we and our customers have a conscious approach to money. The aim is for a comfortable life in which customers can make informed financial choices. And that saving gives them a nice and safe feeling. That is why we handle our customers' money in a responsible way and without risk – as they would do themselves. The product range consists of various savings accounts and term deposits. Customers can use the My Argenta app to easily open new savings accounts and close their internet savings account.

Home

Together with our independent advisers, we ensure that our customers can live comfortably. Clear information with everything sorted quickly and easily: that is what we are all about. With an Argenta mortgage, customers always know where they stand.



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Branches

Argenta is close to its customers. We support our customers via an independent branch network offering them professional and personal advice. Our customer-centred branch network is one of Argenta’s core strengths. The branches are there for the customer. They know their customers and the customers know them. We therefore continue to focus on having specialist branch teams so we can keep offering our customers the right expertise and personal advice, without losing our uniqueness. At the same time, we keep striving to ensure that our branch network is easily accessible and approachable for our customers.

Above all, we want our branches to excel at giving tailored advice and information to our customers, especially when it comes to complex subjects. Because if our customers understand what it is all about, they will make informed choices in accordance with their financial health. It is essential for us to support our independent branches in enhancing their expertise and to engage in good relationship management with them. We provide training to build up substantive knowledge and skills and act as a sounding board for branch managers with the aim of managing and organising a commercially successful branch. Regional managers and financial experts support new and experienced branch managers alike in preparing a commercial and financial business plan. Based on that business plan, they can map the commercial limits and financial health framework of a healthy branch and healthy commercial operation.

Every year since 2021 now, Argenta’s customers have shown their appreciation of these services by voting Argenta as having the Best Branch Network in the Spaargids awards.

The branches – which are in daily contact with customers – are therefore an indispensable source of information and feedback on Argenta’s operational and commercial activities. We focus on a number of fronts to capture this feedback so that we can continuously adjust our operations in response to customers’ needs. For instance, we have structural consultative bodies liaising with the branches in different fields and all directors regularly talk to various branches throughout the year.



In all simplicity

Argenta makes banking and insurance simple for individuals, families and small businesses, empowering them to make informed choices about improving their financial health. For this reason, we are committed to financial literacy. Explaining complex concepts in simple terms, making ourselves as accessible to questions as possible, and ensuring proximity to customers.

For us, simplicity means that we avoid complex financial products and complex processes. It means that we do away with complicated administrative procedures and technical jargon. That we are transparent and communicate clearly.

Simplicity is difficult, but we are good at it. And we have to keep it that way. It is everyone’s job to keep monitoring this, to constantly question any complexity and to dare to ask that something be done about it.

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Our strategy

Peter Devlies has been CEO of Argenta Bank- en Verzekeringsgroep since 1 January 2023. He is also Deputy Chair of Febelfin, member of the Management Board of Assuralia and Board Member of the European Savings and Retail Banking Group (ESBG). We spoke to him about Argenta's priorities over the next few years.



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‘Argenta is a strong and stable bank and insurance company – it is well armed for the future.’

Peter Devlies



Peter, how do you look back on 2024? What sort of year was it for Argenta?

‘2024 was again a year in which Argenta demonstrated its strengths: we started the year with a completely new organisational structure centred around the customer, we saw a net increase in managed assets, we managed to keep our costs under good control and we ended 2024 with a number of awards, such as Best Bank and Best Branch Network. That is proof that our continued genuine focus on simplicity and proximity is really appreciated by our customers. And, as Argentans, that makes us truly proud.’

Simplicity and proximity – will they also be keywords for the future?

‘Definitely. Argenta is the second most popular bank in Flanders. Of every 100 Flemish people, 29 bank with us. What’s more, Argenta is a bank with really high customer satisfaction and we’ve achieved that by always remaining true to our values and culture. And we’ll continue to do so.’

Why are simplicity and proximity so important?

‘The world around us is changing at a rapid pace. And the financial sector is also constantly evolving in terms of geopolitical, economic, technological and regulatory change. As a customer, it is anything but straightforward to see the wood from the trees and actually understand the impact all these developments could have on your financial situation or your wealth.

And that is where our responsibility lies. We see it as our duty to make banking and insurance simple for our customers (families and small businesses), so that they can make the right choices about improving their financial health. And that creates trust.’

It is Argenta’s ambition to enjoy 100 years of business. What has to be done to reach this milestone?

‘Argenta is a strong and stable bank and insurance company – it is well armed for the future. But that doesn’t mean we can rest on our laurels. We have to keep scrutinising ourselves and, above all, stay true to our foundations.

How are we going to do that? By further excelling in the strengths associated with our brand from the very beginning: our focus on the customer, our focus on simplicity and our specific corporate culture.’

What does that mean in concrete terms? What are the key focal areas for Argenta for 2025 and following years?

‘We have four strategic priorities for the coming years. Firstly, we want to remain relevant to the customer anytime, anywhere. And we’ll do that by offering the right insight and solutions specific to each customer via our app as well as in the branches. We’ll use both channels to map our customers’ needs, help them achieve their financial goals and proactively offer them suitable products and services.



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Secondly, we will instil simplicity in everything we do: in our products, our processes, our governance and our communication. Simplicity is what customers expect of us and forms the foundations of the efficiency for which Argenta is known.

Thirdly, we want to make even more of a difference using our greatest asset: our people. Argentans who are driven by our warm and familial culture assume responsibility and take the initiative to further improve the financial health of our customers.

Last but not least, our fourth focal area is what I call professionalism. Customers put their trust in our bank. And they only do that if we are and remain

a stable and reliable bank, even in the light of significant new and more stringent regulations and technological change. That is why we constantly set the bar high for ourselves and strive to achieve the best quality in everything we do and deliver.'

Does the same approach apply to Argenta Nederland, where Argenta has been active for nearly 30 years now?

'To a large extent, yes. The Netherlands represents more than half of Argenta's mortgage portfolio of over EUR 40 billion, and Argenta's market share is still growing.

We're also gaining ground in the Netherlands as a savings bank thanks to our focus on term accounts. In short, the Netherlands is a key market for Argenta – a market in which we firmly intend to grow further. And we'll do that based on the same strategic priorities as in Belgium.

In the Netherlands too, that growth has to be shaped by simplicity. We aim to provide a straightforward mortgage without any hassle. The advisers who work with us can put the drive and expertise of our Dutch Argentans to good use.'

And finally, how does sustainability fit into this picture?

'As I said earlier, Argenta is associated with values such as simplicity and proximity. By effectively making banking simple and easy to access for our customers, we're contributing to the social component of ESG (Environment, Social & Governance).

But our ESG policy goes further than that. As a bank, we have a role to play in the transition to a climate-neutral society. And we do that by systematically reducing our own carbon footprint and staying close to our customers via our product range.

We also guarantee fair and transparent business operations, which in turn contributes to the sustainability and responsibility of our bank.

In short, sustainability goes hand in hand with the strong brand that Argenta is.'



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Risk and capital policy

This chapter forms an integral part of the consolidated financial statements.



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Risk and capital policy

Risk management as a core activity

Professional risk management is a prerequisite for sustainable and profitable growth. Efficient risk management is therefore part of Argenta’s core activities.

The risk management strategy is consistent with Argenta’s overall corporate strategy. The objectives and fundamentals of that strategy, the approved risk tolerance and the division of responsibilities between all the activities of Argenta Bank- en Verzekeringsgroep are laid down in policy documents, such as the Governance Memorandum and the Charters of the independent control functions.

Organisation of the risk management function

Risk appetite, risk tolerance, risk policy

The Board of Directors and the Executive Committee take the lead in creating a healthy risk culture throughout the organisation. They determine the risk appetite, risk tolerance and risk policy for the various business and operational activities. The Board of Directors is meticulous about ensuring that Argenta’s strategic, capital and financial plans are aligned.

The Board of Directors is closely involved in supervising the development of Argenta’s risk profile and the management of all significant risks, and is advised on this by the Risk Committee and the Audit Committee.

‘Three lines of defense’-model

Risk management is based on the three-lines-of-defence model. In other words, the Board of Directors is supported in performing its supervisory tasks by a number of (independent) control functions at three levels:

- **First line**
The first line comprises all the (business) departments within Argenta, which dynamically manage risks by identifying all significant risks, assessing the probability and impact of them occurring, and monitoring them. They do this on the basis of risk mapping.
- **Second line**
The second line is made up of the following functions, which are responsible for the framework and reporting, and independently assess whether the management measures are adequate:
 - NFRM (Non-Financial Risk Management & Supervisory Office) verifies that the non-financial risks lie within the scope of risk appetite and that the first line is taking suitable risk management measures.
 - Risk & Validation checks the financial risks and ensures that the first line is taking suitable risk management measures within the scope of risk appetite vis-à-vis financial risks.
 - Compliance monitors compliance with the statutory, regulatory and ethical rules of integrity and conduct by the organisation or its staff.
 - The actuarial function checks the (re)insurance risks.
- **Third line**
Internal Audit independently provides the statutory administrative body and senior management or, as appropriate, the Executive Committee, with reasonable assurance of the quality and effectiveness of the internal audit, risk management, and the systems and processes for the Company’s corporate governance.



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Three-lines-of-defence model		
Three lines of defence for controlling and managing risks		
First line	The business	> Daily dynamic risk management on the basis of risk mapping
Second line	Four functions which establish the framework, then monitor and report on it	
	• Non-Financial Risk Management & Supervisory Office	> Monitors the non-financial risk management of the first line
	• Risk & Validation	> Monitors the financial risk management of the first line
	• Compliance	> Monitors compliance with the statutory, regulatory and ethical rules of integrity and conduct by Argenta and its staff
	• Actuarial function	> Checks for (re)insurance risks
Third line	Internal Audit	> Independently checks the quality and effectiveness of the risk management measures



The Board of Directors directs the Executive Committee and in particular the CEO and CRO to ensure that sufficient people and resources are available.

Integrated Risk Management Policy

This policy describes the building blocks, practices and processes adopted by Argenta for its risk management model.

The risk management function at Argenta is organised centrally at Argenta Bank-en Verzekeringsgroep (BVg) level, with the exception of the risk management function of the asset managers and Argenta Nederland. These are organised on a decentralised basis in the relevant management companies.

This central risk management function provides a holistic, Group-wide perspective of financial and non-financial risks (including Compliance) and ensures that the risk strategy is complied with.

The Group risk management function is performed by two departments:

- Risk & Validation, focusing on financial risks
- Non-Financial Risk Management & Supervisory Office, focusing on non-financial risks

The Group compliance function plays a key role in shaping and monitoring compliance with Argenta’s integrity policy and is performed by one department:

- Compliance: focusing on compliance risks

These departments define the Group-wide risk management and compliance framework, and decentralised risk management at Argenta Nederland, AAM and Arvestar (asset management companies). These entities report operationally to CRO & Risk Management and Compliance at Group level.

Risk framework

Risk Appetite Framework (RAF)

All major risks to which Argenta is exposed are incorporated in the risk mapping, which is updated once a year, with due regard for hotspot risks that are identified at a higher level.

Each year, the risk appetite is defined in a Risk Appetite Statement (RAS), which sets out the risks Argenta is prepared to accept in pursuing its strategy. We measure the identified risks which are relevant company-wide to ensure that Argenta stays within the set risk appetite. We prepare a risk profile for each risk identified. Regular measurements are carried out on each profile, which are used to keep effective control of the risk appetite, based on RAF limits and flashing lights.

The updated risk mapping and risk appetite statements were approved by the Board of Directors on 27 February 2024 after receiving the Risk Committee’s positive opinion on 20 February 2024.

Based on the limits set, green, amber and red zones are automatically assigned. Every three months, a report is submitted to the Group Risk Committee (GRC) and the Risk Committee of the Board of Directors on the trend in these RAF limits and flashing lights.

The updated RAF limit framework is also submitted to the Board of Directors every six months. The submission dates in 2024 were 26 March and 27 August.

Risk management cycle

Argenta uses the Risk Management Cycle to identify, assess, monitor and report risks.

Identification

Core objective

The core objective of identifying risks is to minimise the key risks within the organisation. A risk map is produced for this purpose, providing an overview of all risks to which Argenta may be exposed.

Hotspot risk assessment

A number of hotspot risks are defined each year via a hotspot risk assessment. This involves carrying out a qualitative analysis, with priority risks being identified on the basis of risk mapping. The risk mapping sets out the 8 types of financial and 12 types of non-financial risks (including compliance) which Argenta may encounter.

Each year, a hotspot risk assessment is then carried out in the fourth quarter, to determine which risk types are to be assigned priority status. Since 2023, we have been carrying out this assessment together with the Management Team CRO (Group level for the financial and non-financial risks, including the decentralised risk management functions for the non-financial risks).



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The directors of the Risk & Validation, Compliance and Non-Financial Risk Management & Supervisory Office (NFRM & SO) departments, and the CRO individually score the various types of risk at their own discretion in their specific risk domain based on how significant the risk is to Argenta (impact on business) and maturity (extent to which Argenta has this risk type under control). Risk & Validation does that for the financial risks, Non Financial Risk Management & Supervisory Office does it for the non-financial risks and Compliance does it for the compliance risks. They also take care of the coordination with the decentralised entities.

At the GRC NFR meeting on 30 November 2023 and Risk Committee meeting on 12 December 2023, climate and sustainability risk, business risk and market risk were identified as financial hotspots for 2024 based on the average scores. Data management risk, sourcing risk, strategic risk & change risk, brand & sustainability risk (reporting) and information security & cyber risk were identified as non-financial hotspots for 2024 based on the average scores.

Risk register

Risks must first be identified before we can then monitor them. All departments do that for themselves using the tools provided by Non-Financial Risk Management (NFRM). They record all identified risks in the risk register, which they then use to monitor the risks. The risk register is the central source of all risks and is used in the same way throughout Argenta.

The inherent and residual probability and impact of each risk is rated using a risk matrix.

- ‘Inherent’ means that we first look at the probability and impact without management measures (such as introducing processes or applying the four-eyes principle).
- ‘Residual’ means that, once the management measures have been defined, we then rate the remaining probability and impact of the risk. Based on this result, we determine whether it is an acceptable risk or whether additional management measures need to be introduced to mitigate the risk. We also decide whether additional monitoring is required. The key risks of concern to and monitored by the department are also incorporated in the internal control annual report and annual self assessment.

Assessment

The second line risk management and compliance function monitors the embedding of risk awareness within the first line and the control of risk management at head office, within the entities and in the branch network. The process of managing the risk involves using a risk-based monitoring system and verifying risk identification, analysis and response at first-line level. The goal is to ensure that the key risks are identified, measured, managed and monitored.

Argenta aims for risks to be managed dynamically. Risk management is more than just checking a box, and has to be integrated in our daily operations. The risk owner’s responsibility does not stop once the risk has been identified. They are also required to bring the risk to an acceptable level and maintain it there (within the scope of risk appetite). The risks are therefore discussed and (re)evaluated on a regular basis. This dynamic approach is necessary because we have to be able to respond to changing circumstances.

Argenta has created a framework of various risk management activities to make it easier to manage the risk and increase risk awareness. The key risks resulting from these risk management activities are entered in the central risk register.

Monitoring

Dynamic risk management and awareness do not stop once the risks have been entered. If a risk has been flagged as very significant in the central risk register, it has to be monitored. This monitoring is logged in an internal control plan within the department.

The internal control plan covers all risks within the department that have to be monitored. Apart from actions triggered by risks, actions prompted by compliance or audit recommendations are also entered in the internal control plan, including a link to the relevant assessment.

Thanks to the transparent internal control plan within one department, it is clear to see who is monitoring what for processes involving collaboration. Even for shared risks in processes with other departments, it is important that the other departments also monitor those risks via the risk register and internal control plan.

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The risk register and internal control plan are monitored regularly (yearly) and on an ad-hoc basis.

Financial risks are monitored on the basis of metrics applicable to the specific risk. The activities involved in monitoring financial risks are supplemented with risk-based checks.

The findings, recommendations and action points are entered and further monitored in the central logging tool (Pentana) set up by Argenta for that purpose.

Reporting

Once a quarter, the Executive Committee (via the GRC) and the Board of Directors (via the Risk Committee) are informed of the status and trend in the key risk and financial indicators using RAF dashboards.

The RAF report uses RAF limits and indicators to provide an overall view of whether the risks taken and business development are in line with the risk appetite approved by the Board of Directors.



Risk policy on sustainability

What are the ESG risk domains identified by Argenta?

Argenta makes sustainable choices based on new regulations, the development of market standards, daily experiences and changes in Argenta’s activities in line with the company values. The choices made can be categorised into three risk domains.

- **Climate and environment risk (E)** – This is the likelihood of financial losses as a direct or indirect consequence of the negative impact of climate and environmental factors on the financial risks associated with counterparties, investments and insurance contracts. Climate and environmental factors are factors that relate to climate warming, biodiversity, energy consumption, environmental pollution and waste management. We make a distinction here between physical risk and transition risks. Physical risks are the direct physical effects of environment and climate on the counterparties, investments and insurance contracts. Transition risks are the risks associated with the timing and speed of the transition to a more sustainable economy in the area of environment and climate, and its impact on the counterparties, investments and insurance contracts.
- **Social risk (S)** – This is the likelihood of financial losses as a direct or indirect consequence of the negative impact of social factors on the financial risks associated with counterparties and investments. Social factors related to the rights, well-being and interests of people and communities. They include factors such as (in)equality, health, inclusion, working relationships, health and safety at work, human capital and communities.
- **Governance risk (G)** – This is the likelihood of financial losses as a direct or indirect consequence of the negative impact of governance factors on the financial risks associated with counterparties and investments. Governance factors deal with administrative practices, leadership, remuneration of directors, audits, internal controls, tax avoidance, independence of the Board of Directors, rights of shareholders, corruption and bribery, and also the way in which companies or entities include environmental and social factors in their policy and procedures.

Risk mapping

Argenta intends to map and monitor the requirements and obligations arising from the above sustainability topics, including their associated risks, and to further develop them in line with Argenta’s sustainability policy. That is why Argenta

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makes a clear distinction in its risk map between climate & sustainability (ESG) as a financial risk, on the one hand, and brand & sustainability as a non-financial risk, on the other. That distinction has been approved by the Board of Directors, acting on the advice of the Risk Committee. The risks revealed in the risk mapping are included in the Risk Appetite Framework (RAF), where a risk profile is drawn up and reported on for each risk type.

Definition of financial risk type: climate & sustainability risk

Climate and sustainability risk (ESG) is defined as the likelihood of impact as a consequence of events or circumstances in the area of environment (E), society (S) or governance (G) that may have a negative effect on the financial performance (e.g. value, liquidity) of assets and liabilities.

This risk is identified as a financial risk because of its strong link to a number of other associated financial risks, mainly market, credit, liquidity and underwriting risks. Climate risk, for example, could have a crucial impact on the credit quality of counterparties via the transition risk due to changes in technology or legislation. These risks are monitored in the credit, insurance and proprietary investments portfolio as well as in the investment funds.

Definition of non-financial risk type: brand & sustainability risk

Brand & sustainability risk is defined as:

- The likelihood of impact as a direct or indirect consequence of how Argenta positions itself (reputationally) as a brand (with the emphasis on ‘simplicity’ and ‘proximity’) and in relation to sustainability, the activities it undertakes for this and how the steps it takes to implement the strategy are perceived.
- The likelihood of impact as a direct or indirect consequence of how Argenta positions itself as a brand (with the emphasis on ‘simplicity’ and ‘proximity’), the activities it undertakes for this and how the steps it takes to implement the strategy are perceived.
- The likelihood of impact as a direct or indirect consequence of the way in which Argenta performs its core activities, takes social responsibility and communicates honestly and transparently about them. Likelihood of impact as a direct or indirect consequence of how Argenta’s actions are assessed by its stakeholders with regard to the environment (environmental), society (social) and healthy corporate culture (governance) and of the way in which it invests (in particular whether this happens in sustainable products, companies or activities).

Quite simply

ESG stands for Ecology, Social and Governance. It is a way of looking at whether companies are acting responsibly as well as whether they are sufficiently prepared for risks associated with the environment, social matters and governance. For example, checks are made to see whether a company is taking good care of the natural world, how its staff are treated and how it contributes to society.

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Brand risk is the possible risk arising from the loss of trust in Argenta or a negative impression Argenta makes on its stakeholders, which include customers, employees, branch managers, regulators and investors. This risk is classified on the basis of how they perceive our brand and value proposition (simple, cost-conscious, close and sustainable). Reputational impact could of course arise from any type of risk.

Sustainability risk is defined as the likelihood of impact as a direct or indirect consequence of the way in which Argenta performs its core activities, takes social responsibility and communicates honestly and transparently about them. It is the likelihood of impact as a direct or indirect consequence of how Argenta’s actions are assessed by our stakeholders with regard to the environment (environmental), society (social) and healthy corporate culture (governance) and the way in which Argenta invests (in particular whether this happens in sustainable products, companies or activities).

Risk management processes
Climate & sustainability

In the financial world, the climate risk and sustainability policy is subject to constant development. An adapted risk management process is therefore needed. Thorough, professional risk management is a prerequisite for sustainable, profitable growth. Argenta recognises this and therefore sees risk ESG risk management as one of its core activities.

The Board of Directors based its risk appetite statement (RAS) on it:

Argenta aims to manage climate and sustainability risks (ESG) appropriately and proactively within the associated risks and activities with a view to achieving the business objectives of the various business lines responsibly, in accordance with Argenta’s sustainability policy and corporate purpose.

The climate & sustainability risk is explicitly incorporated in the financial risks policy, indicating the requisite knowledge and skills required as well as the corresponding principles applicable, so that the strategic, legal and regulatory

requirements can be met (RAF limits). These principles are of the essence when performing the second line controls (Risk & Validation).

Climate and sustainability risk management (ESG) makes it possible to proactively identify and calculate climate and environmental risks (E), social risks (S) and governance risks (G) associated with counterparties, investments and insurance contracts and to align management with the risk appetite, regulatory requirements and market practices. The underlying aim is to mitigate their possible impact on Argenta as a secure, sustainable and responsible bank, insurer and asset manager.

Brand & sustainability

Argenta wants to be credible as a sustainable organisation. This means that we pursue a strong internal ESG policy. Being credible is an important basic condition for Argenta to stand out for its customers.

The Board of Directors based its risk appetite statement (RAS) on it:

Argenta wants the perception that stakeholders (employees, potential employees, consultants, branch managers, suppliers, regulators, third parties, etc.) have of Argenta to reflect the Argenta values and to be known as a sustainable and secure bank-insurer.

We want to be sustainable in everything we do. Caring lies at the heart of the organisation at Argenta. Caring that binds together and offers individuality. By consciously embedding it, we are aiming for satisfied customers, happy employees and healthy long-term business results – which can also be recognised by the outside world. Taking responsibility is an integral part of our long-term vision. A quality that Argenta will uphold for many generations to come.

By identifying brand & sustainability risks as non- financial risks, we are able to look critically at this credibility. We can also monitor important social and governance-related risks that may result from our business operations.

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The brand & sustainability risk is explicitly incorporated in the non-financial risks policy, indicating the knowledge and skills required as well as the corresponding principles applicable, so that the strategic, legal and regulatory requirements can be met (RAF limits). These principles are of the essence when performing the second line controls (NFRM & Supervisory Office).

Brand & sustainability risk (specific RAF limit with 3 RAF flashing lights for brand, sustainability and risk level) is monitored together with other non-financial risk types, such as compliance risk, legal & regulatory risk, human resources risk, sourcing risk, process risk, fraud risk, strategic & change risk, data management risk, cyber & information security risk, IT risk and resilience risk (formerly business continuity risk).

Risk identification, management and monitoring

By performing the materiality analysis on the climate and sustainability risk, as part of the double materiality analysis (as described in 6.2), we can map the key impact, risks and opportunities of ecological topics, social topics and governance topics. The results of that analysis will provide valuable insight – for Argenta’s risk management too – because we can focus more specifically on the material ESG risks.

Climate and sustainability risk is managed in line with the Risk Appetite Statement (RAS). The Risk Appetite Statement specifies which risks Argenta is prepared to accept in complying with its strategy on sustainability. Measurements are taken using risk profiles to ensure that Argenta remains within the Risk Appetite Statement. These measurements are reported on a quarterly basis and assessed for relevance on a yearly basis. As part of this process, we also measure our performance based on an independent ESG risk rating. Sustainalytics is one of the biggest ESG rating agencies in the world and its ESG risk-rating methodology provides useful insights into the most material ESG risks and the management ability of companies to manage these risks.

Risk appetite is also ascertained for the other social and governance-related risks within the RAF for each risk type, and the risk metrics to be monitored in the risk profile are determined.

- Via the risk profile of ‘strategy & change’, we monitor all underlying risks associated with the strategy. Via the change risk, we monitor the impact on processes associated with the strategy and changes thereto.
- Compliance risk: Argenta wants to act with integrity and, in this connection, be in line with the market with respect to its rules governing conduct and supervision of conduct.
- Social risks are monitored at a more granular level. Risks are identified within areas such as the HR risk (own employees), data privacy and security (customers) and sourcing risk (suppliers).

Based on the results of the DMA, the risk profiles will be further expanded in 2025 and adjusted in line with the materiality of the identified risks.

More information on Argenta’s policy geared to managing ecological risks, social risks and governance risks can be found in the following chapters [Ecology](#), [Social](#) and [Governance](#).



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Capital policy

Definition of capital risk

Capital risk is the risk of available capital falling short of the capital required to support the activities and associated risks. To monitor this risk, we systematically carry out comparisons between the regulatory requirements and our internal objectives.

Capital management

The company’s capital management is aimed at maintaining a solid solvency position, with a constant search for a good balance between the amount of capital held and the risks run by the company.



Quite simply

Solvency provides insight into how financially healthy a company is. The solvency ratio or capital ratio is a measure of how much capital a bank has available, reported as a percentage of a bank’s risk-weighted credit exposures. The goal is to determine that banks have sufficient capital reserves to absorb a certain loss before they run the risk of going out of business.

The company must comply with the regulatory capital ratios at all times, striving for a healthy balance between, on the one hand, the business objectives with sufficient room to grow and, on the other hand, a healthy capital base which allows the company to bear all material risks.

The company has always pursued a policy of self-financing and wishes to continue to do so. We want to maintain a level of capital that leaves enough room to grow and to bear all material risks. That is why we are striving to achieve an optimum composition of growth in core capital (with retention of profit and capital increases) and issuing of bail-in instruments.

Internal capital requirements

All material risk factors are modelled within the internal process of assessing capital adequacy (ICAAP – Internal Capital Adequacy Assessment Process for the Bank Pool and ORSA – Own Risk and Solvency Assessment for the Insurance Pool). In this way, a more comprehensive picture is obtained of the economic capital requirement.

The ICAAP of the company consists of the combined ICAAP of the Bank Pool and ORSA of the Insurance Pool. The ICAAP/ORSA process is intended to identify and quantify all material risks, so that the adequacy of the available capital can be assessed and the required capital can be allocated to the product lines.

- From an economic perspective, the capital process consists of the following steps:
1. Identification and assessment of the material risks
 2. Calculation of the required economic capital
 3. Calculation of the available economic capital
 4. Calculation of the current and future capital adequacy of the Banking and Insurance Pools
 5. Allocation of the capital requirements to the business lines and product groups

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The RAF provides for the monitoring of the capital risk via, inter alia, the following RAF limits (BVg, Aspa and/or Aras):

- CET-1 ratio (Common Equity Tier 1)
- TC ratio (total capital)
- Leverage
- MREL(Minimum Requirement for own funds & Eligible Liabilities)
- ICAAP 99.90%
- Solvency II Pillar 1
- ORSA 99.50%

This means that, in all circumstances (stress scenarios), the capital requirements of the company are satisfied with an adequate degree of certainty.

Statutory framework for capital requirements

As a mixed financial holding company, the company falls under CRR and CRD legislation¹. The Bank Pool (Aspa and subsidiaries) is subject to CRR and CRD legislation while the insurer (Aras) is required to meet the Solvency legislation. Further information on Pillar 1 (minimum capital requirements) and Pillar 2 (Supervisory Review & Evaluation Process of SREP) is provided below. The company’s Pillar 3 disclosures and the insurer’s SFCR disclosure are published separately on the company’s website.

The solvency ratio at company level is calculated according to the Danish compromise method. This is a compromise that – subject to approval by the regulator – can be applied by mixed financial holding companies. Under this method, the value of the insurance participation does not have to be deducted from equity. Instead, the participation value, which is equal to the historic acquisition value, is included in the calculation of the risk-weighted assets.

In addition to the solvency ratios, the company must also disclose its solvency position as a financial conglomerate (in accordance with the Financial Conglomerate Directive or FICOD legislation). This means that the available capital is calculated based on the consolidated position, under CRR and CRD legislation for the Bank Pool and Solvency legislation for the insurer.

Changes in legal capital requirements

The CRR and CRD legislation has been amended in accordance with the Basel IV principles. The changes apply with effect from 1 January 2025. The changes relate to how credit, market and operational risks are calculated. Standardised methods are more risk-sensitive. In addition, the use of internal models is limited, and the impact of internal models is reduced as a result of the introduction of a capital floor (which is the minimum Risk Weighted Asset or RWA level for credit institutions using internal models).

A number of important measures are subject to a transitional period of 5 years. It will therefore be a few years until the full impact of these measures is perceptible, which should give the company time to prepare and adjust. The main impact is the introduction of the capital floor, as the credit risk is largely calculated using internal models. We only expect a limited impact on initial application on 1 January 2025 because of the transitional measures. The capital floor is expected to apply as of 2027.

¹CRR = Capital Requirements Regulation; CRD = Capital Requirements Directive

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Minimum legal capital requirements under CRR and CRD

The Pillar 1 requirements impose a minimum solvency ratio of 4.5% of the Tier 1 core capital (CET-1) ratio, 6% for the Tier 1 ratio (T1) and 8% for the Total Capital (TC) ratio. The regulators have the possibility to impose a number of additional buffers (combined buffer requirements). The buffers for the company are:

- A **capital conservation buffer** with an additional CET-1 requirement of 2.50%.
- A **countercyclical capital buffer** with an additional CET-1 requirement: this is calculated as a weighted average of the requirement imposed per country and the company’s exposure to that country. As of 1 October 2024, the Belgian regulator has set the percentage at 1%. Since 31 May 2024, the Dutch regulator has set the percentage at 2%.
- A **buffer for systemically important institutions**: the Belgian regulator has designated the company as an O-SII or other system-relevant institution, as a result of which the company is subject to an additional CET-1 requirement of 0.75%.
- A **systemic risk buffer** (SyRB) introduced by the National Bank of Belgium (NBB): that is a macroprudential measure aimed at credit institutions with positions in the Belgian residential property market applying the internal rating approach (IRB). On 31 December 2024, this requirement was 0.95% of the consolidated level of Argenta Spaarbank and 0.89% of the consolidated level of Argenta Bank- en Verzekeringsgroep.

As there is no additional Tier-1 capital or Tier-2 capital, the entire solvency requirement is compensated via CET-1.

Within the framework of the Supervisory Review and Evaluation Process (SREP), the competent regulator (can impose higher minimum ratios as a result of the assessment of the robustness of the business model, the adequacy of the risk governance and the adequacy of the capital and liquidity situation. For 2024, the ECB has imposed a Pillar-2 requirement (P2Requirement) of 1.50% and a Pillar-2 recommendation (P2Guidance) of 1.50%.

New requirements have also been in effect since 12 December 2024 within the scope of the bail-in settlement strategy. Bail-in ensures that the losses and recapitalisation costs of a failing credit institution, where possible, end up with the shareholders and (subordinated) creditors. The company and Bank Pool must meet:

- A binding MREL (Minimum Requirement of own funds and Eligible Liabilities for bail-in) and Subordination target of 19.31% of the Total Risk Exposure Amount (TREA – risk-weighted) (or 24.14% including Combined Buffer Requirement)
- 6.60% of the Leverage Risk Exposure (LRE – not risk-weighted)



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Minimum legal capital requirements – Solvency

The Solvency legislation requires insurance undertakings to maintain minimum own funds (solvency ratio) of 100%. The eligible own funds can be subsequently used in the calculation of the solvency ratios.

- The **solvency capital ratio requirement** (or SCR ratio) is the minimum own funds that insurance and reinsurance undertakings are required to hold in order to ensure capital adequacy, applying a hypothetical scenario with a probability of no more than one year in 200 (value at risk of 99.50% over one year).
- The **minimal capital ratio** (or MCR ratio) is the minimum own funds that insurance and reinsurance undertakings are required to hold in order to ensure capital adequacy, applying a scenario with a 15% probability (value at risk of 85% over one year). The MCR must amount to a minimum of 25% and a maximum 45% of the SCR.

The prudential supervision of Argenta Assuranties is carried out by the National Bank of Belgium.

The figures calculated in accordance with the Solvency II principles form the basis of the internal monitoring. Several departments are responsible for ensuring that we remain compliant with new requirements, including Credit & Insurance Risk Management Support – Actuarial, Risk & Validation, and Accounting & Reporting.

The Actuarial department calculates a Solvency II capital ratio under Pillar 1 on the basis of the standard specifications and contributes to further improvement of the processes in preparation for required Solvency II reports.

The Risk department shares responsibility for risk governance via the RAF (Risk Appetite Framework), ORSA (Own Risk & Solvency Assessment) Pillar 2, the relevant policy documents and internal risk reporting.

For the purposes of ORSA, all the risks within Argenta Assuranties were identified and assessed. This involved going through all the steps of the ORSA process, including the FLAOR (Forward-Looking Assessment of Own Risks) and assessment of the material risks.



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Solvency in the company (unaudited)

The following table shows the company’s solvency figures, in accordance with CRR and CRD legislation (based on the Danish compromise method), and in accordance with FICOD legislation.

The company’s solvency	31.12.2023	31.12.2024
Available capital		
Tier 1 core capital (CET-1)	2,860,248,081	3,075,033,428
Tier 1 capital (T1)	2,860,248,081	3,075,033,428
Total capital (TC)	2,860,248,081	3,075,033,428
Risk-weighted items		
Total risk-weighted assets (RWA or TREA)	12,765,911,166	10,700,449,394
Risk-based capital ratios as a percentage of RWA		
Tier 1 core capital ratio (%)	22.41%	28.74%
Tier 1 capital ratio (%)	22.41%	28.74%
Total capital ratio (%)	22.41%	28.74%
Additional CET1 buffer requirements as a percentage of RWA		
Capital conservation buffer requirement (%)	2.50%	2.50%
Countercyclical capital buffer requirement (%)	0.44%	1.45%
System risk buffer	1.07%	0.89%
O-SII capital buffer requirement (%)	0.75%	0.75%
Total of CET-specific buffer requirements (%)	4.76%	5.59%
Total capital requirements (%)	14.27%	15.09%
Available Tier 1 core capital after meeting total SREP capital requirements (%)	12.91%	19.24%
FICOD ratio		
FICOD capital ratio	21.07%	24.02%

Leverage ratio		
Baseline total exposure figure for calculating the leverage ratio (LRE)	55,276,005,693	57,259,102,606
Leverage ratio (%)	5.17%	5.37%
Liquidity Coverage Ratio (LCR)		
Total high-quality liquid assets (HQLA)	6,568,570,823	7,153,806,768
Total net cash outflow	3,000,643,625	3,627,598,906
LCR ratio (%)	218.91%	197.21%
Net Stable Funding Ratio (NSFR)		
Total available stable funding	48,072,411,858	51,000,407,339
Total required stable funding	34,150,070,260	35,035,254,036
NSFR ratio (%)	140.77%	145.57%
Minimum requirement for own funds and eligible liabilities		
Eligible liabilities	2,111,145,756	2,112,713,003
Eligible liabilities subordinated to excluded liabilities	2,111,145,756	2,112,713,003
Minimum requirement for own funds and eligible liabilities LRE (%)	8.66%	8.78 %
Minimum requirement for own funds and eligible liabilities subordinated LRE (%)	8.66%	8.78 %
Minimum requirement for own funds and eligible liabilities TREA (%)	39.47%	50.03%
Minimum requirement for own funds and eligible liabilities subordinated TREA (%)	39.47%	50.03%

The Company amply meets the statutory capital requirements. The change in the Tier 1 core capital is the result of a dividend distribution of EUR 106.8 million, followed by a capital increase of EUR 55.0 million, and the adding of the profit to the reserves. A proposal will be made by the company’s Board of Directors to the General Meeting of Shareholders to declare an additional dividend of EUR 84.5 million. In accordance with the CRR legislation for expected dividends, an expected dividend has already been deducted from the Tier 1 core capital.

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The Tier 1 ratio has increased from 22.41% to 28.74% as of the end of 2024. The increase in the ratio is the result of the combination of a decrease in the risk-weighted assets and increase in equity. The risk-weighted assets went down in the course of 2024 as a result of the approved internal model for Dutch home loan portfolios. This led to a decrease in the risk-weighted assets by EUR 1.8 billion.

Solvency of the Bank Pool (unaudited)

The following table shows the Bank Pool’s solvency figures, in accordance with CRR and CRD legislation.

The Bank Pool’s solvency	31.12.2023	31.12.2024
Available capital		
Tier 1 core capital (CET-1)	2,660,761,687	2,898,898,356
Tier 1 capital (T1)	2,660,761,687	2,898,898,356
Total capital (TC)	2,660,761,687	2,898,898,356
Risk-weighted items		
Total risk-weighted assets (RWA or TREA)	12,088,889,655	10,017,849,957
Risk-based capital ratios as a percentage of RWA		
Tier 1 core capital ratio (%)	22.01%	28.94%
Tier 1 capital ratio (%)	22.01%	28.94%
Total capital ratio (%)	22.01%	28.94%
Additional CET1 buffer requirements as a percentage of RWA		
Capital conservation buffer requirement (%)	2.50%	2.50%
Countercyclical capital buffer requirement (%)	0.44%	1.45%
System risk buffer	1.14%	0.95%
O-SII capital buffer requirement (%)	0.75%	0.75%
Total of CET1 specific buffer requirements (%)	4.83%	5.65%
Total capital requirements (%)	14.33%	15.15%
Available Tier 1 core capital after meeting total SREP capital requirements (%)	12.51%	19.44%

Leverage ratio		
Baseline total exposure figure for calculating the leverage ratio (LRE)	55,097,591,988	57,080,335,623
Leverage ratio (%)	4.83%	5.08%
Liquidity Coverage Ratio (LCR)		
Total high-quality liquid assets (HQLA)	6,568,570,823	7,153,806,768
Total net cash outflow	3,004,654,956	3,629,993,197
LCR ratio (%)	218.61%	197.07%
Net Stable Funding Ratio (NSFR)		
Total available stable funding	47,774,598,558	50,725,945,362
Total required stable funding	34,150,070,260	35,035,254,036
NSFR ratio (%)	139.90%	144.79%
Minimum requirement for own funds and eligible liabilities		
Eligible liabilities	2,111,145,756	2,112,713,003
Eligible liabilities subordinated to excluded liabilities	2,111,145,756	2,112,713,003
Minimum requirement for own funds and eligible liabilities LRE (%)	8.66%	8.78%
Minimum requirement for own funds and eligible liabilities subordinated LRE (%)	8.66%	8.78%
Minimum requirement for own funds and eligible liabilities TREA (%)	39.47%	50.03%
Minimum requirement for own funds and eligible liabilities subordinated TREA (%)	39.47%	50.03%

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The company’s Bank Pool amply meets the statutory capital requirements. The change in Tier 1 core capital is the result of an interim dividend distribution of EUR 101.4 million, followed by a capital increase of EUR 70.1 million, and the adding of the profit to the reserves. The Board of Directors will not make any proposal to the General Meeting of Shareholders for an additional dividend.

The Tier 1 ratio has risen from 22.01% to 28.94% as of the end of 2024. The increase in the ratio is the result of the combination of a decrease in the risk-weighted assets and increase in equity. The risk-weighted assets went down in the course of 2024 as a result of the approved internal model for Dutch home loan portfolios.



Solvency of the insurer (unaudited)

The following table shows the solvency figures of the company’s insurer, in accordance with Solvency legislation.

Solvency of the insurer	31.12.2023	31.12.2024
Total of Balance Sheet SII	6,529,515,390	6,878,083,616
Excess of assets over liabilities	891,894,605	902,573,032
SCR	388,591,156	461,569,091
MCR	150,815,314	157,341,636
Ratio of eligible own funds to SCR	2.30	1.96
Ratio of eligible own funds to MCR	5.91	5.74

With an SII ratio of 196%, the company’s insurer amply meets the statutory capital requirements.



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Governance

This chapter forms an integral part of the consolidated financial statements.

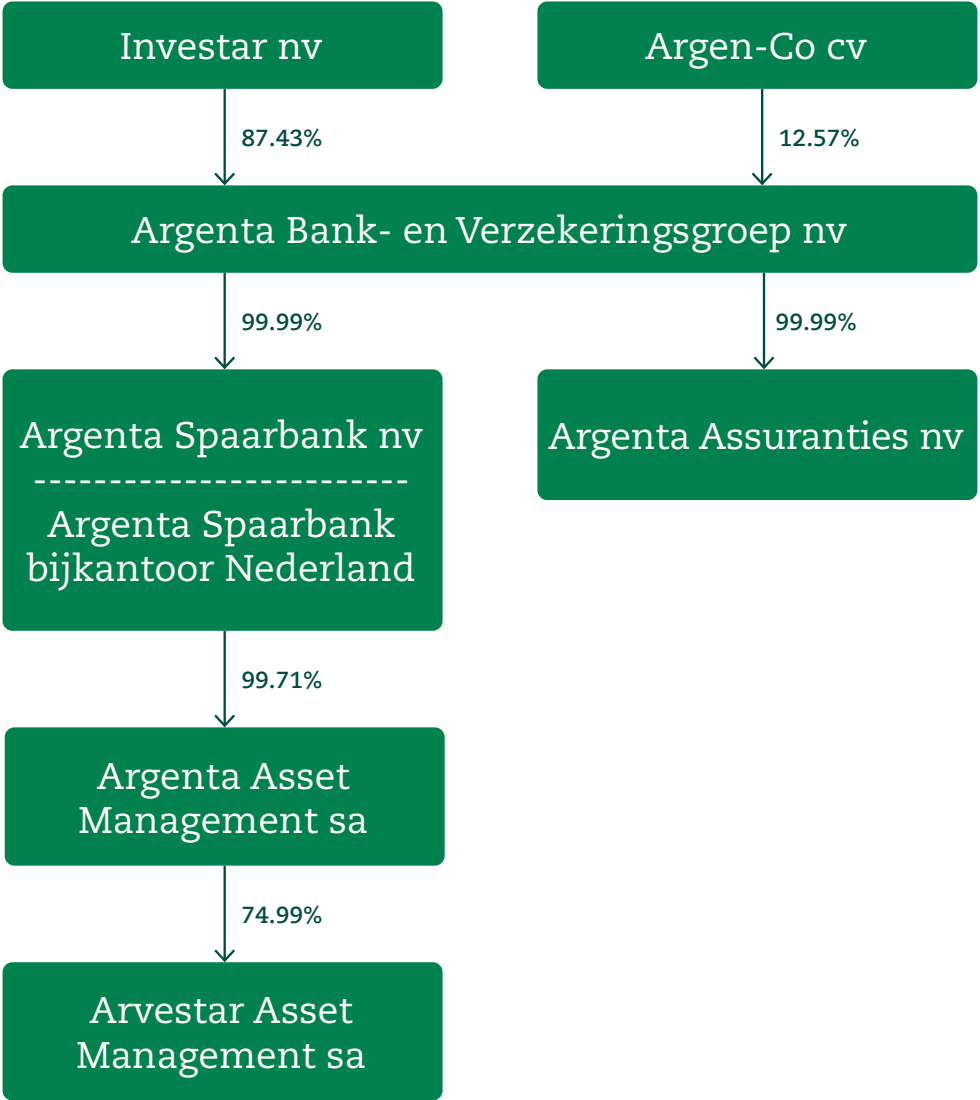


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Group structure



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Investar nv

Investeringsmaatschappij Argenta is een gemengde financiële holding en voor 87,43 % eigenaar van de Argenta Bank- en Verzekeringsgroep nv.



Argen-Co cv

Argenta Coöperatieve is a cooperative company with the primary goal of further developing Argenta Bank- en Verzekeringsgroep.

Customers and branch managers can subscribe to shares. Argen-Co is a 12.57% shareholder of Argenta Bank- en Verzekeringsgroep nv.

Argenta Bank- en Verzekeringsgroep nv

Argenta Bank- en Verzekeringsgroep (BVg) is the management holding company of the Argenta Group and has the status of a mixed financial holding company, a parent company which is not a regulated company and which is at the head of a financial conglomerate. The activities of Argenta Bank- en Verzekeringsgroep consist of internal audit, legal affairs, human resources, compliance, risk & validation, non-financial risk management, supervisory office and general secretariat. These activities are organised centrally for all Argenta companies.

Internal Audit, Compliance and Risk (risk management function which manages the externally outsourced actuarial function) are the legally prescribed independent control functions.

Argenta Bank- en Verzekeringsgroep consolidates and is responsible for the joint management of the subsidi-

aries, Argenta Spaarbank and Argenta Assuranties.

All participating interests within Argenta are (quasi) 100% participations, so that no (other than purely formal) minority interests are reported. The only exception to this is the management company Arvestar Asset Management, established in 2018, in which Argenta Asset Management holds a majority stake of 74.99%.

Belgium and the Netherlands are the geographical markets in which the company is commercially active.

Argenta BVg has two governing bodies: the Board of Directors and the Executive Committee. A Remuneration Committee, Appointments Committee and Group Supervisory Committee have been set up within the Board of Directors.

The Works Council (OR) and the Committee for Prevention and Protection at Work (CPBW) support the Executive Committee in the area of human resource management. The Group Risk Committee (GRC), together with GRC FR (financial risks), GRC NFR (non-financial risks including compliance), GRC MoCo (Model Overview Committee), supports the Executive Committee in the area of financial and non-financial risk management.

Argenta Spaarbank nv

Argenta Spaarbank (Aspa) is a Belgian credit institution and together with the branch office in the Netherlands and its subsidiaries (Argenta Asset Management and Arvestar Asset Management), it forms the Argenta Group's 'Bank Pool'. Argenta Spaarbank offers banking products tailored to

individuals and families. It has four key activities.

Activities in Belgium

These are the four key activities of Argenta Spaarbank:

- Banking: the provision of means of payment, such as current accounts, payment cards, credit cards and securities accounts
- Savings: attracting savings
- Investing: offering investment funds managed by Argenta Asset Management, Arvestar Asset Management
- Lending: provision of home loans and instalment loans

Activities in the Netherlands

Argenta Spaarbank Nederland has been active in the Netherlands since 1997. It has had a branch in Breda since 2003, which is responsible for two key activities:

- Lending: providing home loans
- Savings: attracting savings to the Dutch market

The Netherlands is Argenta's second home market and an important growth area. CEO Sander Blommaert heads Argenta in the Netherlands.

Governing bodies

Aspa has the following governing bodies:

- Aspa Board of Directors
- Advisory committees which support the Board of Directors: the Audit Committee and Risk Committee
- Appointments Committee, Remuneration Committee, Group Supervisory Committee: set up at Group level within the Board of Directors of BVg (see above)
- Aspa Executive Committee



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- Senior management team of Argenta Nederland
- Argenta Asset Management and Arvestar Asset Management Board of Directors and Executive Committee

The following committees play a supporting role:

- Human resource management: Works Council, Committee for Prevention at Work and the Netherlands Works Council
- Risk management (financial and non-financial risks, including compliance): GRC (with GRC FR, GRC NFR, and GRC MoCo) and the Asset & Liability Committee (Alco)
- Commercial organisation: Joint Consultative Body, Sanctions Committee
- Change initiatives: Delivery Committee
- Settlement: Settlement Planning Committee

Argenta Assuranties

Argenta Assuranties (Aras) is a Belgian insurance company that seeks to protect the financial assets of individuals and families through non-life and health insurance (family insurance, fire, motor and hospitalisation insurance) and through life and death insurance (including outstanding balance insurance). Argenta Assuranties also offers insurance-based investment in the form of branch 23 products.

In addition to its insurance activity, Argenta Assuranties also contributes to stimulating the real economy, by investing the insurance premiums it receives in home loans, liquid securities and shares selected on the basis of sustainability criteria.

Aras has the following governing bodies:

- Aras Board of Directors
- Advisory committees which support the Board

- of Directors: the Aras Audit Committee and Risk Committee
- Appointments Committee and Remuneration Committee: set up at Group level within the Board of Directors of BVg (see above);
 - Aras Executive Committee

The following committees play a supporting role:

- Human resource management: Works Council (OR) and Committee for Prevention and Protection at Work (CPBW)
- Commercial organisation: Joint Consultative Body, Sanctions Committee
- Risk management (financial and non-financial): Insurance Risk Committee, GRC, Alco
- Change initiatives: Delivery Committee

Arvestar Asset Management

Arvestar Asset Management, a joint venture between Argenta Asset Management and Degroof Petercam Asset Management, was founded in 2018 and is a subsidiary of Argenta Asset Management. Arvestar Asset Management manages the Argenta pension savings funds and the Argenta DP Allocation funds. Argenta Asset Management and Degroof Petercam Asset Management hold 74.99% and 25.01% of the shares respectively.

The management company Arvestar Asset Management is headed by Vincent Vanbellingen (CEO) and Rudolf Sneyers (CRO).

Arvestar is responsible for managing the Argenta pension savings funds and the mirror funds based on them.

On 31 December 2024, 304,208 Argenta customers



were accruing their supplementary pensions via these pension savings funds or investing via the Argenta DP funds based on them, the management of which has been entrusted to Degroof Petercam Asset Management since 1999.



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Argenta Asset Management

Argenta Asset Management is a Luxembourg company responsible for the management and central administration of Argenta’s variable-capital Undertakings for Collective Investment in Transferable Securities (UCITS) under Luxembourg law: Argenta-Fund sicav and Argenta Portfolio sicav.

The objective is to offer investors attractive returns by investing in a selection of securities matching the customer’s personal risk profile.

Argenta Asset Management is responsible for managing Argenta-Fund (11 sub-funds) and Argenta Portfolio (5 sub-funds), the management of which has been entrusted to Argenta Asset Management since 1987 for Argenta-Fund and 2009 for Argenta Portfolio.

Argenta Asset Management is managed by Gregory Ferrant (CEO) and Filip De Nil (Conducting Officer).

Other participating interests

Argenta Spaarbank has a participating interest in Jofico cv. This is a joint venture between Argenta Spaarbank, formerly Axa Bank, Crelan, VDK Bank and Bpost that jointly manages the ATMs of these institutions.

In past years, Argenta Spaarbank has also executed a number of securitisation transactions under the name of Green Apple. In these transactions, Dutch mortgage loans were sold to separate companies (SPVs or Special Purpose Vehicles), which issued debt securities to finance these purchases. Although there is no capital link with Argenta Spaarbank, the Green Apple companies are consolidated.

The management of the relevant activities is regulated by contractual agreements and the powers of the voting rights are limited to administrative decisions. The determination of control over structured undertakings takes into account the purpose and design of the undertaking, the ability to direct the relevant activities and the extent of exposure to the variability of the risks and income of the undertaking.

Argenta Spaarbank and Argenta Assuranties also maintain equity instruments of European Projects Investment Company (Epico), a Benelux infrastructure fund. Epico is also an associated company of Argenta Bank- en Verzekeringsgroep at consolidated level.

An overview of the Group structure for the consolidated financial statements at Argenta Bank- en Verzekeringsgroep level is given below.

Consolidation Group structure	%	31.12.2023	31.12.2024
Argenta Bank- en Verzekeringsgroep nv		consolidating entity	consolidating entity
Bank Pool			
Argenta Spaarbank nv	99.99%	full consolidation	full consolidation
Argenta Asset Management nv	99.99%	full consolidation	full consolidation
Arvestar Asset Management nv	74.99%	full consolidation	full consolidation
Green Apple 2017 bv (SPV)	0.00%	full consolidation	full consolidation
Green Apple 2018 bv (SPV)	0.00%	full consolidation	full consolidation
Green Apple 2019 bv (SPV)	0.00%	full consolidation	full consolidation
Green Apple 2021 bv (SPV)	0.00%	full consolidation	full consolidation
Jofico cv	20.00%	equity method	equity method
Insurer			
Argenta Assuranties nv	99.99%	full consolidation	full consolidation
Epico nv	27.46%	equity method	equity method

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Board of Directors and Committees

This chapter covers the administrative bodies of the various entities.

Board of Directors

Within the Argenta Group, there is a Board of Directors for BVg, Aspa and Aras. The BVg Board of Directors generally meets together with the Aspa and Aras Boards of Directors.

Mission

The Board of Directors is the highest decision-making body in Argenta. The members of the Board of Directors make decisions about:

- The strategy and objectives of Argenta’s companies, including the sustainability strategy and objectives
- The risk policy and general risk tolerance limits, including the ESG risk policy
- The organisation for providing or performing investment services and activities and ancillary services
- The integrity policy

The Board of Directors monitors the activities and regularly assesses the effectiveness of the governance system and internal control system. The Board of Directors strives to manage the company in accordance with the principle of good corporate governance, with the aim of properly managing and monitoring the company on the basis of a set of rules and behaviours. More detailed information on this is provided in the [Governance](#) chapter.

Overview of administrative, management and supervisory bodies	Executive members	Non-executive members	% independent members	Employee representatives*	Male/female
BVg Board of Directors	3	7	20%	n/a	8/2
Aspa Board of Directors	7	8	20%	n/a	9/6
Aras Board of Directors	7	7	14%	n/a	9/5
BVg Executive Committee	3	n/a	n/a	n/a	3/0
Aspa Executive Committee	7	n/a	n/a	n/a	4/3
Aras Executive Committee	7	n/a	n/a	n/a	4/3
Aspa Audit Committee	n/a	3	66%	n/a	3/0
Aras Audit Committee	n/a	3	66%	n/a	3/0
Aspa Risk Committee	n/a	4	75%	n/a	4/0
Aras Risk Committee	n/a	3	66%	n/a	3/0
BVg Remuneration Committee	n/a	3	33%	n/a	3/0
BVg Appointments Committee	n/a	3	33%	n/a	3/0
BVg Group Supervisory Committee	n/a	3	33%	n/a	3/0
Works Council	1	n/a	n/a	11	6/5
CPBW	n/a	n/a	n/a	14	7/7

*Only salaried employees are represented.

Good governance cannot be ensured via the organisational structures, procedures and control mechanisms alone. It significantly strengthens the commitment and dedication of all Argenta employees. It is therefore important for the Board of Directors to determine the strategic objectives and Argenta values, and the internal codes of conduct or formal rules, which specify how the company acts in a spirit of integrity and commitment.

For these values to be applied, it is important that management imposes strict rules of conduct on itself and sets a good example.

The Board of Directors operates as a collegial body. The division of tasks and interaction between the Boards of Directors and the various committees in Argenta are documented in the [Governancememorandum](#).

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The relevant business departments and sustainability manager regularly inform the Board of Directors and the advisory and supporting committees of the interests of stakeholders and achievements of the sustainability strategy, as well as the objectives, policy and actions in response to the identified material impact, risks and opportunities. For further information, see [Internal reporting on sustainability](#).

Composition of the Board of Directors
Who sits on the Board of Directors?

The members of the Executive Committee sit on the Argenta Board of Directors, together with a number of directors representing the shareholders and a number of independent directors. The independent directors and directors representing the shareholders are hereinafter referred to jointly as the ‘non-executive directors’.

How are the Boards of Directors constituted?

The Boards of Directors are constituted in such a way that none of the three different groups (the directors representing the shareholders, the independent directors and the directors on the Executive Committee) has the majority. The majority on the Boards of Directors is always formed by non-executive directors.

The following age limits apply to directors:

- Executive directors are legally required to resign on reaching the legal retirement age.
- Non-executive directors resign automatically on reaching the age of 73. Directors reaching the age limit may continue to exercise their mandates until a successor has been appointed.

The Board of Directors may permit exceptions to these rules on a case-by-case basis.

Because of the sudden unexpected departure of one director, the composition of the Aras Board of Directors – pending the replacement of this director – is not in accordance with the requisite majority of non-executive members. We are rectifying this situation by appointing an additional independent director.

When constituting the Board of Directors, consideration is given to the fact that the directors must be collectively suited to working as a team to ensure that Bank- en Verzekeringsgroep is managed with integrity and care. The Board of Directors as a whole is therefore required to have all the knowledge, experience, intellect, management experience and decision-making ability to lead the entity under the principles of sound and prudent management. That includes general and specific knowledge of and experience in the field of banking and insurance, as well as satisfactory expertise in climate and sustainability topics and risks (ESG). The knowledge and experience of the Board members are mapped in a skills matrix.

On 31 December 2024, the Board of Directors of Argenta Bank- en Verzekeringsgroep was composed as follows:

- Marc van Heel: chair of the Board of Directors and member of the Remuneration Committee and Group Supervisory Committee
- Geert Ameloot, executive director and CFO
- Peter Devlies, executive director and CEO
- Marie-Anne Haegeman: non-executive director
- Rudi Peeters: non-executive director
- Baudouin Thomas: non-executive and independent director, chair of the Group Supervisory Committee
- Cynthia Van Hulle: non-executive director

- Bart Van Rompuy: non-executive director, member of the Appointments Committee, Remuneration Committee and Group Supervisory Committee
- Raf Vanderstichele: non-executive, independent director, chair of the Appointments Committee and Remuneration Committee
- Gert Wauters: executive director and CRO

On 26 April 2024, non-executive, independent director Carlo Henriksen retired. On 22 October 2024, Caroline Thijssen resigned as non-executive, independent director.

The company’s Board of Directors met 13 times in the past financial year.

How many directors are there?

The number of directors for each Board of Directors should preferably not exceed fifteen. Board members must be natural persons. In principle, directors’ mandates are for six years and are renewable.

How are independent directors appointed?

Independent directors are appointed with a view to attracting competencies in the Argenta Group’s core activities, namely banking and insurance. Independent directors need to have broad knowledge of and experience in at least one of these core fields on the basis of their former or current activity. They need to meet all the requirements stipulated in Section 7:87 of the Belgian Companies and Associations Act (WVV).

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Marc van Heel



Bart Van Rompuy



Marie-Anne Haegeman



Cynthia Van Hulle



Raf Vanderstichele



Baudouin Thomas



Bart A. Pattyn



Rudi Peeters



Veerle Timmermans

Non-executive Board members of the Argenta Group

Marc van Heel

Chair of the Argenta Board of Directors since 2019

Marc van Heel was appointed by the General Meeting of Shareholders as chair of the Board of Directors of Argenta (BVg, Aspa and Aras) on 26 April 2019. He is also a member of the Appointments Committee, Remuneration Committee and Group Supervisory Committee of the Argenta Group and a member of the Risk Committee of Argenta Assuranties.

Marc van Heel has more than 30 years' experience in management and board positions with international financial service providers (including PIMCO, GSAM, BlackRock and JP Morgan) and has worked as a consultant for De Nederlandsche Bank since 2016. Since November 2017, he has been a member and since April 2019 chair of the Argenta Board of Directors, and a member of the Risk Committee, the Appointments Committee and the Group Supervisory Committee.

He gained his diploma as a Certified European Financial Analyst at the School of Business and Economics of VU Amsterdam and completed the following executive education programmes: International Directors Programme (Insead, 2016), Risk Management for Banks (Insead, 2018), Impeccable Leadership (F&P, 2021), Toezicht op Artificial Intelligence (UVA, 2022), Managing Partnerships & Strategic Alliances (Insead, 2022) and Role of the Chair (IMD, 2024).

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Bart Van Rompuy

Represents the family shareholder Investar on the Argenta Board of Directors.

Bart Van Rompuy represents the majority shareholder Investor on the Board of Directors. Investar is the holding company of the Van Rompuy family, which founded the Argenta Group. He monitors the family identity and values. He is also a member of the Appointments Committee, the Remuneration Committee and the Group Supervisory Committee of the Argenta Group.

Since 1977, he has held various positions within the Argenta Group and was formerly chair of the Executive Committees and the Boards of Directors in Belgium, Luxembourg and the Netherlands.

He is an architect by training and was responsible for the construction of both the first and the most recent Argenta buildings in Antwerp. In line with the family’s values, sustainability was his greatest concern in the construction of these buildings.

He has completed various executive business programmes at Cambridge Judge Business School, Insead, Vlerick Business School, Antwerp Management School and Erasmus University in Rotterdam.

He is a passionate art lover.

Marie-Anne Haegeman

Since 2019 non-executive director at Argenta, represents the family shareholder

Marie-Anne Haegeman started her career at KBC Group in 1988. She has held various management positions in finance and at the end of 2007 became

general manager of the Group Risk department. In this role she was responsible for ALM risk management, ICAAP and the process and modelling section. In 2011, Marie-Anne transferred to a first-line-of-defence role in treasury and became treasurer of the KBC Insurance Group. She returned to the second line of Defence in 2014 as CRO of the Belgian business unit and of CBC.

In 2018, she decided to leave the KBC Group to take on a new challenge at Euroclear as CRO of Euroclear Bank. In addition to this role, in 2020 she became chair of Euroclear’s Belgian works council. In November 2021, she returned to the first line and took on the role of Head of Banking and Network Management. She is a member of the Executive Committee of Euroclear Bank and a member of the Board of Directors.

Cynthia Van Hulle

Since 2015, non-executive director at Argenta, represents Argen-Co

Cynthia Van Hulle joined Argenta in October 2015 as a director. She is a member of the Board of Directors of Argenta Spaarbank nv, Argenta Assuranties nv and Argenta Bank- en Verzekeringsgroep nv.

Cynthia Van Hulle began her professional career at KU Leuven in January 1984 having gained her doctorate. In October 1993, she became full professor in finance at the same university. Since then she has held various visiting and tenured education positions at other institutions (Yale University, University of Chicago, Columbia University, ULB, UA, Vlerick) and a whole series of academic management functions at KUL. Her main academic interests are corporate governance, corporate finance and financial engineering.

In addition to her academic activities, she has been and is an adviser to a range of government agencies in the field of management by banks of financial public funds. She has also been a member of numerous government steering committees and a member of the High Council of Finance, the Flemish Council for Science Policy and the Federal Economic Risk Management Group.

In the corporate sector, she has acted as a euro arbitrage expert and since 1996 has held board positions in listed and unlisted companies (Gimvindus nv, Finindus nv, Werfinvest nv, LB-Capital nv, Autonoom Gemeentebedrijf M, Almancora/ KBC-Ancora – at the latter as chair of the Board of Directors). Outside Argenta, she is a director at ArgenCo cv, Miko nv (+ chair of the Audit Committee) and WDP nv (+ chair of the Audit Committee). She is also involved as a director or as a member of the governing body of non-profit organisations (Rega instituut vzw, Salco vzw).

Raf Vanderstichele

Since 2014, independent director at Argenta

Raf Vanderstichele was appointed an independent director of Argenta in April 2014. He is chair of the Audit Committee of Argenta Spaarbank, a member of the Risk Committee of Argenta Spaarbank and chair of the Appointments and Remuneration Committees of the Argenta Group.

Raf completed his studies in applied economics at KUL in 1979, after which he worked at PWC until June 2011. From 1991, he was a partner in the audit practice as an accredited statutory auditor. His clients included financial service providers such as Axa and Baloise,

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listed companies such as Umicore, Jensen and Ablynx, and other multinational companies operating in Belgium such as Volvo, TUI and Electrolux.

Raf also gives strategic advice about auditing, governance and financial management to companies such as Anacura and non-profit organisations such as the Anticancer Fund.

Baudouin Thomas

Sinds 2018 onafhankelijk bestuurder bij Argenta

Baudouin Thomas was appointed a non-executive member of the Board of Directors of Argenta Spaarbank nv and Argenta Assuranties nv in 2018. In 2020, he was also made a non-executive member of the Board of Directors of Argenta Bank-en Verzekeringsgroep nv. He is chair of the Risk Committee of Argenta Spaarbank and a member of the Risk Committee of Argenta Assuranties, a member of the Audit Committees of Argenta Spaarbank and Argenta Assuranties and chair of the Group Supervisory Committee of the Argenta Group.

Baudouin began his career at Accenture in 1993 and in 2006 was promoted to Partner (Managing Director) in the Financial Services Industry. During his last three years at Accenture (2015-2018), he was a member of the Board of Directors of Accenture Belgium and from 2010 to 2018 a member of the executive team of Accenture Belgium and Luxembourg. From 2010 to 2018, he managed the Financial Services section in Belgium and Luxembourg and delivered strategy, technology and outsourcing projects for customers in banking and insurance and the capital market. He has also held international positions such as global distribution and marketing offering lead for Accenture Financial Services.

Baudouin set up Reimagine at the end of 2018, with a focus on digital transformation and artificial intelligence. He is also a non-executive board member of Tender Experts, a start-up specialising in public procurement, and a member of the Agoria Digital Industries Committee.

From 2017 to 2020, he was a member of the Board of Directors of Start it@KBC, the largest incubator for start-ups in Belgium.

Bart A. Pattyn

Since 2021, independent director at Argenta

Bart A. Pattyn joined the Board of Directors of Argenta in January 2021. He is an independent, non-executive director at Argenta Assuranties nv, and chair of the Audit Committee and Risk Committee of Argenta Assuranties.

Bart began his career at Kredietbank nv (now KBC Bank nv) in 1985. He has held a variety of positions in retail and corporate banking in Belgium, Ireland, Spain, Singapore, USA and India. In 2000, he joined the French insurer Coface sa, where he managed greenfield and scale-up insurance companies in Asia (based in Singapore) and in North and Latin America (based in Mexico).

Bart was a member of the Executive Committee of Coface in France (2012-2018), chair of the Board of Directors of Seguradora Brasileira de Credito a Exportação s.a. (2008-2018) and a member of the Advisory Board of AirFrance KLM in Mexico (2017-2019).

Bart is also a Guberna director and certified in sustainable finance.

Rudi Peeters

Since 2024, non-executive director at Argenta, represents the family shareholder

Rudi Peeters joined the Board of Directors of Argenta in April 2024 as a representative of the family shareholder. He is a member of the Audit Committee and Risk Committee at Argenta Spaarbank as well as Argenta Assuranties.

Rudi is a biologist by training, having studied at KU Leuven. He started working for Cera in 1987, which later merged with Kredietbank to become KBC. He steered the bank through a digital transformation process with a strong focus on the SAFe Agile approach. From 2011 to 2021, he was CIO of the KBC Group.

In 2021, Rudi became the first non-family CEO of brick producer Vandersanden, until the end of 2023.

He is a director at Colruyt, Torfs and Intesa vzw. He is also an adviser to start-ups and scale-ups, a coach and a visiting lecturer.



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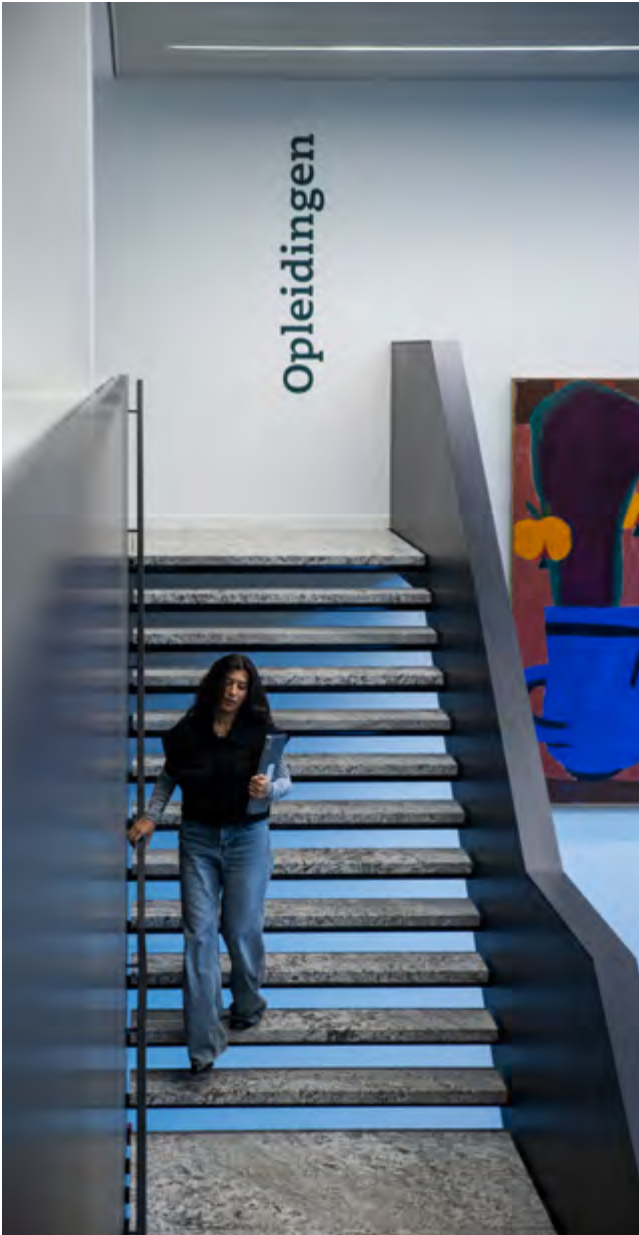
Veerle Timmermans

Since 2024, independent director at Argenta
Veerle Timmermans joined the Board of Directors of Argenta in April 2024. She is a member of the Risk Committee of Argenta Spaarbank.

Veerle studied remedial education at KU Leuven and has completed many management training courses.

She worked for KBC for over 20 years, the last 10 years of which was as general manager. She started her career at KBC in HR (management development and skills management), after which she advanced to commercial positions in retail banking (office director and cluster office director). In 2013, she was appointed as a member of the senior management team of KBC Belgium. She was successively responsible for corporate lending (2013) and private lending and deposits (2017). She then returned to retail banking within the Belgium business unit, as general manager for channel support.

In June 2022,Veerle moved to Securex as chief officer operations and a member of the Executive Committee of Securex Group. She was appointed as CEO of Securex International in August 2024.



Selection procedure

1. In selecting members of the Board of Directors and the Executive Committee, the Appointments Committee, together with the Board of Directors, decides which competences are needed to strengthen the Board of Directors. Based on this decision, the Appointments Committee then draws up a profile and starts a search in cooperation with an external selection agency.
2. New members of the Executive Committee and the Board of Directors are selected principally on the basis of their specific knowledge, training and experience with a view to strengthening the operation of the committee of which they are members while taking gender target figures into consideration. In the selection of potential candidates, the Appointments Committee assumes the role of adviser to the Board of Directors. It evaluates expertise and suitability in accordance with the Suitability of Key Officers Charter.
3. The Board of Directors selects a candidate and presents this person to the regulator. The final appointment is made when the regulator has found the proposed candidate to be a fit and proper person.

The Suitability of Key Officers Charter sets out the company’s governance and structured framework to ensure the (‘fit and proper’) suitability of its key officers. ‘Suitability’ means that the key officer in question is a person with expertise and professional integrity.

Expertise in sustainability

At Argenta, the executive and non-executive directors must have the requisite knowledge, experience and management experience as well as the necessary intellect and decision-making ability to manage the

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organisation in accordance with the principles of integrity and care. For sustainability, this means that they have the necessary expertise in climate and sustainability topics (in terms of impact, risks and opportunities) and keep abreast of the relevant developments.

The Appointments Committee is tasked with advising the Boards of Directors of the Argenta Group companies on the decisions relating to the composition, the structure and the operation of the Board of Directors and Executive Committee.

Argenta regularly organises training in specific topics (such as sustainability) for Board members. For example, a strategic offsite event was held in June 2024 on standing out in terms of sustainability. Outside guest speaker, Wim Vermeulen, gave a presentation on: ‘Looking ahead and how you can make a difference’. This was followed by an interactive workshop in which the Board members reflected on the direction the Board wants to take in the long term in the field of sustainability.

Evaluation of operation

Operation is evaluated at different levels:

- In accordance with Section 31 of the Belgian Banking Act, the Appointments Committee assesses the knowledge, skills, experience and degree of involvement of the individual members of the statutory administrative body and the statutory administrative body as a whole, and reports back to the Board of Directors.
- The tasks of the compliance function also include monitoring compliance with the statutory and regulatory suitability and diversity requirements. The Suitability of Key Officers Charter was revised

- in 2023 in accordance with the EBA/GL/2021/06[1] guidelines and the NBB Manual of December 2022 with regard to suitability assessment.
- The Executive Committee carries out an annual evaluation of its own operation on a self-assessment basis. There is also an external assessment at least every two years of the performance of the Executive Committee as a whole and of the individual Executive Committee members. The Executive Committee presents the results of this assessment to the Board of Directors.
 - An independent third party evaluates the operation of the Board of Directors annually. A thorough evaluation is always followed by two lighter evaluations in the following years. We then take appropriate action based on the results of these evaluations.

An assessment of the working and effectiveness of the Board of Directors was carried out at the end of 2024. The assessment confirmed the professional functioning of the Board of Directors and the presence of the necessary competences and expertise to ensure a balanced decision-making process. The proposed improvements will be adopted and applied.

Advisory committees supporting the Board of Directors

Audit Committees and Risk Committees

The Boards of Directors of Argenta Spaarbank and Argenta Assuranties each have their own Audit and Risk Committees.

- The Audit Committee supports the Board of Directors in fulfilling its duty of oversight of the financial reporting process, the non-financial and sustainability-related information-giving and reporting process, the internal control system,

- the audit process and the business process for monitoring compliance with legislation and regulations. The Audit Committee also monitors compliance with the ESG policy, with a particular focus on human rights, environmental policy and the code of conduct for suppliers.
- The Risk Committee assists the Board of Directors in monitoring the implementation of the risk strategy by the Executive Committee and determines how and when the Board of Directors receives information about risks. This includes information on the monitoring of risks and opportunities within the scope of climate change and other ESG topics.

The Audit Committee and Risk Committee of the Board of Directors of Argenta Spaarbank monitor the (limited) specific activities of Argenta Bank- en Verzekeringsgroep.

- The Audit Committee is composed of the following members:
- Raf Vanderstichele (Aspa Audit Committee – chair)
 - Bart Pattyn (Aras Audit Committee – chair)
 - Baudouin Thomas (Aspa and Aras Audit Committee)
 - Rudi Peeters (Aspa and Aras Audit Committee)

- The Risk Committee is composed of the following members:
- Baudouin Thomas (Aspa Risk Committee – chair, and Aras Risk Committee)
 - Bart Pattyn (Aras Committee – chair)
 - Raf Vanderstichele (Aspa Risk Committee)
 - Veerle Timmermans (Aspa Risk Committee)
 - Rudi Peeters (Aspa and Aras Risk Committee)

In 2024, the Audit and Risk Committees of both Argenta Spaarbank and Argenta Assuranties met six times.

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Remuneration Committee and Appointments Committee

Argenta has an active Remuneration Committee and Appointments Committee:

- The Remuneration Committee provides the Boards of Directors with advice on remuneration policy. This includes the fees of the members of the Board of Directors and the salaries of those staff whose professional activities can have a material impact on Argenta (the ‘identified staff’) and the pay policy within all other Argenta companies (including AAM and Arvestar). The Remuneration Committee annually assesses the remuneration of executive and non-executive directors, with due regard for the established pay policy and for legal and regulatory provisions. The Committee also assesses whether the remuneration could create a conflict of interests between directors and the institution. In addition, the Remuneration Committee defines the target figures to be met in the area of diversity.
- The Appointments Committee is tasked with advising the Boards of Directors of the Argenta Group companies on the decisions relating to the composition, structure and operation of the Board of Directors and Executive Committee. The Appointments Committee examines the performance of the Boards of Directors and Executive Committees, as well as the performance of the individual members. The committee also prepares the succession plans in the two bodies.

Both committees are set up within the Board of Directors of Argenta Bank- en Verzekeringsgroep. They function at Argenta Group level based on a waiver granted by the supervisory authority. No separate remuneration committees have been set up within the Boards of Directors of either Argenta

Spaarbank or Argenta Assuranties.

The Remuneration Committee is composed of the following members:

- Raf Vanderstichele (chair);
- Marc van Heel
- Bart Van Rompuy

The Remuneration Committee met three times in 2024.

The Appointments Committee is composed of the following members:

- Raf Vanderstichele (chair);
- Marc van Heel
- Bart Van Rompuy

The Appointments Committee met six times in 2024.

The composition of both committees has been temporarily adjusted further to the sudden and unexpected departure of a director, which meant that there was no majority of independent directors in the Remunerations Committee. Furthermore, the composition of the Appointments Committee and Remuneration Committee is now temporarily identical. Pending the selection of a new independent director, this is the best alternative to ensure the continuity of decision-making during this transitional period.

Group Supervisory Committee

Argenta has a Group Supervisory Committee which operates within the Board of Directors of Argenta Bank- en Verzekeringsgroep. It is complementary to the Audit Committee and the Risk Committee. The Audit Committee and the Risk Committee handle the full scope of the Group, and the Group Supervisory Committee monitors possible intra-group conflicts

of interest between the various legal entities of the Argenta Group.

The Group Supervisory Committee is composed of the following members:

- Baudouin Thomas (chair)
- Bart Van Rompuy
- Marc van Heel

The Group Supervisory Committee met twice in 2024.

Executive Committee

There is an Executive Committee for BVg, Aspa and Aras. The BVg Executive Committee generally meets together with the Aspa and Aras Executive Committees.

The members of the Executive Committee are members of the Board of Directors as executive directors.

All members of the Executive Committees are expected to be familiar with retail banking and insurance and, in particular, with distribution via a network of self-employed branch managers in combination with digital channels. The members of the Executive Committee are appointed on the basis of their relevant training, knowledge and experience (as also substantiated in the fit & proper assessment). They undertake to keep abreast of the relevant developments in their specialist area. This also includes knowledge of and experience in climate and sustainability topics (ESG) and risks.

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Peter Devlies



Geert Ameloot



Gert Wauters



Ann Brands



Brigitte Buyle



Agnita Deweerdt



Sander Blommaert

The Executive Committee was composed of the following members at the end of 2024:

Peter Devlies

- Chief Executive Officer since January 2023
- Member of the Board of Directors of Argenta Spaarbank nv, Argenta Assuranties nv, Argenta Bank- en Verzekeringsgroep nv
- Chair of the Board of Directors of Argenta Asset Management sa

Peter Devlies began his professional career in 1998 at McKinsey & Company and in 2004 joined Dexia Bank Belgium (now Belfius), where he held various director positions and from 2008 to 2010 was commercial marketing director for retail, affluent, business and private customers.

He continued his career at Bank J. Van Breda & C°, where he held the position of Chief Operations Officer from 2010 to 2013 and Chief Financial Officer from 2014 to 2016. He combined these roles with the positions of CEO of Van Breda Car Finance (2010 to 2016) and CEO of ABK Bank (2011- 2016).

In 2016 he transferred to Axa Bank Belgium, where he held the position of CEO up to the end of 2021.

Since 2023, Peter Devlies has been CEO of Argenta. Peter is also Deputy Chair of Febelfin, and a member of the Management Board of Assuralia and ESBG (European Savings and Retail Bank Group).

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Geert Ameloot

- Chief Financial Officer (CFO) since June 2011²
- Member of the Board of Directors of Argenta Spaarbank nv, Argenta Assuranties nv and Argenta Bank- en Verzekeringsgroep nv

Geert Ameloot started his professional career in finance at Ford New Holland in 1989. He joined General Electric’s Power Controls division in 1993 in Belgium and moved up to a European role at the head office in Barcelona. Between 1997 and 2004, he continued his international career as CFO of Avis Fleet Services for Germany and Switzerland, and CFO of GE Capital Bank in Switzerland. From 2004 to 2011, he was managing director of GE’s European Funding Operation.

As CFO at Argenta, Geert is responsible for Accounting & Reporting, Treasury & Investment Management, Financial Management and Procurement.

Gert Wauters

- Chief Risk Officer (CRO) since July 2010
- Member of the Board of Directors and Executive Committee of Argenta Spaarbank nv, Argenta Assuranties nv and Argenta Bank- en Verzekeringsgroep nv
- Member of the Board of Directors of Argenta Asset Management sa since 2016

Gert Wauters began his professional career in 1989 in the international section of Bacob Bank. He later became head of Structured Products and in 1993 head of Asset & Liability Management. In 1996, he became director of Capital Markets. In 2003, he was appointed director of Risk Management, first at Dexia Bank

Belgium level responsible for credit risk, moving up to Dexia Group level in 2006 as head of Market Risk, then head of Transversal Risk (until 2010).

As CRO at Argenta, Gert is responsible for loan & insurance risk management support, risk & validation (including the actuarial function), non-financial risk management & supervisory office, and compliance.

Ann Brands

- Chief Officer (CO) Retail since June 2023³
- Member of the Board of Directors and Executive Committee of Argenta Spaarbank nv and Argenta Assuranties nv

Ann has been active in the financial sector since 1987, first at Aegon Belgium, then at Delphi Verzekeringen. In 1999, she joined KBC, where she held various positions, from head of claims department Antwerp to head of process management non-life claims and later expert project manager PMO (program management office). In 2012, she joined Fidea Verzekeringen. As general manager IT & organisation, she was responsible for long-term strategy and budget, contract negotiations, infrastructure, software maintenance, project portfolio, process organisation and business intelligence.

As COO at Argenta as of 2016, Ann was responsible for banking, savings and investment, lending, insurance, customer management and process excellence. Since June 2023, as CO Retail, she oversees Digital channels, Family & Protection, and Home Belgium.

Brigitte Buyle

- Chief Information Officer (CIO) since April 2020
- Member of the Board of Directors and Executive Committee of Argenta Spaarbank nv and Argenta Assuranties nv

Brigitte Buyle began her professional career as a systems engineer at IBM. She held various positions at IBM and eventually became a director of IBM Belgium in 2014 and IBM Vice President Industry Solutions & Business Development Benelux. Between 2016 and 2020, she was a member of the Executive Committee of Ethias as Chief Information Officer (CIO) and a member of the Board of Directors of NRB. As CIO at Argenta, she is responsible for IT infrastructure, architecture and applications and their operation and security.

Agnita Deweerdt

- Chief Officer (CO) Affluent & Business since June 2023
- Member of the Executive Committee and Board of Directors of Argenta Spaarbank nv and Argenta Assuranties nv
- Member of the Board of Directors of Argenta Asset Management sa

Agnita Deweerdt began her professional career at the law firm Stibbe and joined Argenta as a management trainee in 2012.

In June 2019, she became director of Distribution. As Chief Officer Affluent & Business since June 2023, she has commercial and operational responsibility for investment management (including the asset management companies and life insurances), business, branches and contact centre.

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²End of mandate on 25 February 2025
³End of mandate on 25 February 2025

Sander Blommaert

- CEO Netherlands since August 2022
- Member of the Board of Directors and Executive Committee of Argenta Spaarbank nv and Argenta Assuranties nv since June 2023

Sander Blommaert began his professional career at Rabobank, where he held a succession of different positions. From 2015 to January 2017, he was CFRO at Rabobank Oosterschelde.

In January 2017, he became Chief Risk & Financial Officer Netherlands at Argenta. In August 2022, he was appointed CEO Netherlands. In June 2023, as CEO Netherlands, he became a member of the Executive Committee and Board of Directors of Argenta Spaarbank and Argenta Assuranties. His appointment affirms the strategic significance of the Dutch activities.



Mission

- The tasks falling under the responsibility of the Executive Committee include:
- Executing the strategy laid down by the Board and management of the company
 - Implementing the risk management system
 - Introducing, monitoring and assessing the organisational and operational structure
 - Reporting to the Board of Directors and to the regulator
 - Organising oversight of the subsidiaries and branch office

The Executive Committee of Argenta Bank- en Verzekeringsgroep determines the framework within which the various group companies can perform their activities and exercise their responsibilities.

The mission and the composition of the Executive

Committees are defined with a view to the maximum operational integration of the individual companies in the interest of the Group.

The sustainability policy is laid down by the Executive Committee and approved by the Board of Directors. Policy decisions relating to corporate social responsibility (including economic impact, social Impact and environmental impact) are monitored directly by the CEO in his role as Chief Sustainability Officer (CSO). His mission is to give sustainability a prominent place in all of Argenta’s sections, through the strategic business objectives, the sustainability action plan, the risk policy (including monitoring the impact, risks and opportunities within the scope of climate change and ESG), the annual budgets and the business plans, etc.

The CSO is supported by the sustainability manager within the Marketing & Sustainability department, who shares responsibility for implementing and monitoring the policy and sustainability action plan across the various departments.

The departments share responsibility for implementing their policy and are involved via the committees supporting the Executive Committee, in accordance with the general governance processes. Communication and regular coordination within Argenta and between the various committees are of vital importance for governance to function properly.

Via the CEO report, the CEO reports monthly to the Board of Directors on the policy, KPIs (Key Performance Indicators) and actions of all departments within the organisation.



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Supporting committees

Human resource management

At Argenta, we place great importance on the involvement of employees in the HR policy. To achieve this involvement, there are various consultative and advisory bodies, such as the Works Council (OR), the Works Council Netherlands (OR NL) and the Committee for Prevention and Protection at Work (CPBW). These offer employees the chance to actively participate in decisions affecting their work and well-being.

Works Council (OR)

The Works Council (OR) is a body in which the head of the company and their representatives inform and consult with the employee representatives:

- The Works Council comprises the head of the company, their representatives and the representatives elected by employees every four years in the works council elections.
- The OR of BVg, Aspa, Aras, Arvestar and Investar has three tasks: to provide information and give advice, make decisions in specific cases, and perform monitoring activities.
- The employer delegation comprises the director of O&T (chair), the CEO and any other Executive Committee members, supported by the HR manager and adviser on labour relations, prevention and well-being.
- The employee delegation is made up of elected representatives and a secretary who is chosen from the employee representatives at the first meeting.

Within three months of the end of the financial year, the Works Council receives the consolidated sustainability information and details of how the sustainability information is obtained and verified.

The Works Council discusses this information prior to the parent company’s general meeting.

Decisions require a two-thirds majority and are confirmed in the report. They enter into effect after their approval at the next meeting. The Works Council meets 11 times a year on the third Friday of the month, apart from in July or August.

Works Council Netherlands (OR NL)

Within Aspa, the Works Council NL represents the interests of the organisation by giving advice on business economic and labour issues. The Works Council has the right of approval in staffing arrangements. This helps ensure that Argenta functions properly in the Netherlands. The Council is made up of an employee delegation of five elected employees, including the chair and secretary, and an employer delegation comprising the CEO, manager of O&T and directors of Home and Savings Netherlands. They meet once a month, and once a quarter with the employer delegation.

Committee for Prevention and Protection at Work (CPBW)

The Committee for Prevention and Protection at Work (CPBW) is a joint consultative body in which the head of the company informs and consults with the employee representatives. It is made up of the director of O&T as representative of the employer, the elected employee representatives, and the internal prevention adviser as the secretary. It is possible for other members to be invited. The CPBW promotes the well-being of employees by proposing statutory and regulatory resources. Among other topics, the CPBW is informed of the environmental policy pursued within the scope of the operational activities of the head

office in Belgium. The employer delegation is headed by the director of O&T and supported by experts in HR management and labour relations. The employee delegation is made up of the elected representatives and the prevention adviser. It is possible for guests, such as the company physician, to be invited on an ad-hoc basis. Decisions are taken with a two-thirds majority of both employee and employer representatives and enter into effect after approval at the next meeting. The CPBW meets eleven times a year, every third Friday of the month, apart from in July or August.

Risk management

The Group Risk Committee (GRC) deals with a number of topics each month to achieve better coordination, monitoring, follow-up, awareness-raising, adjustment and policy preparation at the various risk levels, relating to the Bank Pool as well as Insurance Pool. Risks relating to climate and sustainability are also monitored by the GRC. The GRC advises on the risk strategy and risk appetite to be approved by the Board, and determines the company-wide risk management framework.

The GRC meets once a month as well as on an ad-hoc basis whenever necessary. Every three months, the GRC focuses specifically on financial risks, model risks and non-financial risks:

- The GRC Financial Risks (GRC FR) handles all financial risks (including the expected credit losses – ECL) in a broad sense, including all aspects of Pillar 2 capital management. It also discusses the financial RAF reporting (current, looking ahead and self-imposed) and RAM reporting (Risk Asset Management). In addition, it manages the stress testing policy and programme.

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- The GRC Model Overview Committee (GRC MoCo) monitors the governance relating to model risk management, manages the model risk profile, and develops and monitors all models within the framework of model management. In this way, the GRC MoCo maintains a central overview and monitors the consistency of model choices across all model types within the company. The Validation Committee forms part of the GRC MoCo and meets to discuss and validate the activities of the validation unit regarding the internal models.
- The GRC Non-Financial Risks (GRC NFR) is organised at Group level. On a company-wide basis, it deals with non-financial risks and advises on policy and methodology involved in non-financial risk management. The entities are permanently represented on this committee. The GRC NFR also guides specific consultative bodies, monitors the decisions and risk responses, can formulate recommendations and takes the necessary decisions in the event of escalation. Once a quarter, the GRC NFR discusses the NFR risk profiles within the RAF (Risk Appetite Framework) for the whole group, including the branch network.

The Alco committee (Asset & Liability Committee) monitors:

- Optimum balance sheet equilibrium by proposing, evaluating and following up actions aimed at minimising the value and result shocks caused by imbalances in the company’s assets and liabilities
- The liquidity position, the interest rate and spread risk, and the solvency position, including leverage and MREL (Minimum Requirement for own funds & Eligible Liabilities)
- The diversification and risk profile of the investment portfolio



- Provision of information on risks that could impact the company’s current and future profits and capital position, with the exception of the insurance risks that are monitored in the Insurance Risk Committee.
- Optimum financing diversification, including potential wholesale issuances, which also extends to covered bonds
- The PARP (Product Approval and Review Process) for non-retail products

The Alco committee meets on a monthly basis or on demand when required.

Corporate governance

The commitment and dedication of all Argentans are crucial for corporate governance. For this reason, in addition to the strategic objectives, the Board of Directors also defines Argenta’s integrity policy and the internal codes of conduct or formal rules, which specify how the company interacts with all Argenta’s stakeholders with integrity and commitment. The Integrity Charter is used to convey and inspire these values and codes of conduct within Argenta. The necessary framework is laid down in the Integrity Charter, which sets out Argenta’s own focus values and purpose (reason for being), as well as ethical standards for ensuring the integrity of the banking and insurance sector. It is not just important for Argenta to ensure its own value-conscious and ethically responsible conduct, but also for employees to safeguard their personal integrity. Management has a

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model role to play in this process (the tone at the top), so it must first impose strict rules of conduct on itself.

The ethical standards for the integrity of the banking and insurance sector are elaborated in greater detail in thematic policies using the Integrity Charter as a starting point.

Fees of senior management

The fees of the directors are determined by the General Meeting on the basis of legal regulations. The Board of Directors requests the advice of the Remuneration Committee before preparing a motion for the fees.

Remuneration of non-executive directors

Non-executive members of the Boards of Directors receive a fixed remuneration only, which is determined by the competent general meetings. They do not receive variable pay of any kind. The amount paid is the same for all independent directors and directors representing the shareholders.

Non-executive directors who also attend special committees set up within the Board of Directors (Audit Committee, Risk Committee, Group Supervisory Committee, Appointments Committee and Remuneration Committee) receive an additional fee, set by the Board of Directors. All members of the committee receive the same fee. The chair receives a higher fee.

No severance pay exists for non-executive Board members.

Remuneration of the chair of the Board of Directors

The chair of the Boards of Directors receives a fixed remuneration which differs from the amount paid to the other non-executive directors. The chair does not receive any additional fee for each meeting attended. Apart from the fixed annual remuneration, the chair of the Board also enjoys the benefits of an IPT (Individual Retirement Commitment), a company car, an expense allowance and contributions to the collective hospitalisation costs policy. The severance pay received by the chair is the same as that received by the executive directors.

Remuneration of executive directors

The executive directors receive a fixed annual remuneration which does not include any elements that could lead to a conflict of interests with Argenta’s longer-term objectives.

The fixed annual remuneration complies with the requirements laid down in Annex 2 of the Banking Act on remuneration policy. All members of the Executive Committees receive the same remuneration, with the exception of the chair.

In addition to the fixed annual remuneration, executive directors also benefit from three group policies: pension capital, disability, and hospitalisation insurance.

Contractual severance pay

The severance pay of executive directors is in line with the recent update to Section 12(1) of Annex II of the Banking Act, which came into force from 23 July 2022 and with the variable remuneration exemptions contained in the Banking Act since June 2023.

It consists of a non-competition payment and a payment by analogy with severance pay for administrative staff. The total of these payments may not exceed twelve months of gross pay of the executive director concerned.

Overview of remuneration

In 2024, the total direct remuneration of the executive directors of the Argenta Group (Argenta Bank- en Verzekeringsgroep, Argenta Spaarbank and Argenta Assuranties) amounted to EUR 3,280,895.37. In 2023, this figure was EUR 2,937,777.37.

Contributions to the group supplementary pension and disability policies for the executive directors and chair of the Board of Directors amounted to EUR 756,922.69 in 2024. In 2023, this figure was EUR 658,668.41.

Information on conflicts of interest

In 2024, no decisions were taken for which additional information on conflicts of interest had to be submitted in accordance with Section 7:96 of the Belgian Companies and Associations Code (WVV).

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External appointments and directors’ personal interests

All directors are encouraged to organise their personal and professional activities in such a way as to avoid conflicts of interest with Argenta.

The Boards of Directors of the companies have, in their internal rules of procedure, established a policy on conflicts of interest, setting out organisational and administrative arrangements and specifying the information to be retained on the application of these arrangements. The rules include procedures

for identifying and forestalling conflicts of interest or, where this is not possible, managing the conflicts of interest without harming the interests of customers.

The following directors of the company have exercised external mandates during the past financial year:

Name and present position within the institution	Name of the company in which an (external) mandate is exercised	Registered office	Industry sector	Position	Listed on a regulated market (Y/N)	Capital link ⁴
Devlies Peter Executive Director	European Savings and Retail Banking Group	België	Management company	Director appointed by Aspa	N	N
	Assuralia – since 24.06.2024	België	European banking association	Director appointed by Aspa	N	N
	Febelfin – since 20.09.2024	België	Professional association of insurance companies	Member of the Exco Director appointed by Aspa	N	N
	BVB – since 20.09.2024	België	Federation for the Belgian financial sector	Member of the executive committee Director	N	N
	Kompanjon VZW	België	Belgian association of banks and stockbroking companies	Director	N	N
Bart Leeman Secretary-General	Management 52 BV – until 25.09.2024	Belgium	Management company	Director	N	N
Marie-Anne Haegeman Non-executive director	Euroclear Bank NV	Belgium	Credit institution	Executive director	N	N
Carlo Henriksen – until 26.04.2024 Non-executive director	Cofena VZW	Belgium	Culture	Director	N	N
	Royal Golf Club Ostend	Belgium	Golf	Chair	N	N
Rudi Peeters Non-executive director	Colruyt Group NV	Belgium	Retail	Director (via Rudann BV)	Y (Euronext)	N
	Intesa VZW	Belgium	Service centre	Director	N	N
	Rudann BV	Belgium	Management company	Director	N	N
	Torfs Import Service NV	Belgium	Retail	Director (via Rudann BV)	N	N
	Vandersanden Group NV – until 31.05.2024	Belgium	Construction	Director (via Rudann BV)	N	N

⁴This concerns the capital link of the companies.



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Name and present position within the institution	Name of the company in which an (external) mandate is exercised	Registered office	Industry sector	Position	Listed on a regulated market (Y/N)	Capital link
Caroline Thijssen – until 04.10.2024 Non-executive director	CT Impact BV	Belgium	Management company	Director	N	N
	VP Capital NV	Belgium	Financial holding company	Director	N	N
	Etex NV	Belgium	Industrial holding company	Director (via CT Impact)	Y (Euronext)	N
	Toolbox VZW	Belgium	Other	Chair	N	N
Baudouin Thomas Non-executive director	BTH Consulting BV	Belgium	Management company	Director	N	N
	Reimagine BV	Belgium	Digital and AI Consulting	Director (via BTH Consulting)	N	N
	Tender Experts BV	Belgium	SAAS software	Director (via BTH Consulting)	N	N
Marc van Heel Chair of the Board of Directors	Kerkelijke Instelling Erfgoed Glorieux	The Netherlands	Charity	Chair of the Supervisory Board	N	N
	Calmer Haven BV	The Netherlands	Management company	Director	N	N
Cynthia Van Hulle Non-executive director	Argenta Coöperatieve CV	Belgium	Financial holding company	Director	N	N
	Warehouses de Pauw NV	Belgium	Real estate	Director	Y (Euronext)	N
	Miko NV	Belgium	Food	Director	Y (Euronext)	N
	Rega Instituut VZW	Belgium	Research	Director	N	N
Bart Van Rompuy Non-executive director	Investeringsmaatschappij Argenta NV	Belgium	Financial holding company	Director	N	N
	Rapportering en coördinatie BV	Belgium	Management company	Director	N	N
Raf Vanderstichele Non-executive director	Korora BV	Belgium	Management company	Director	N	N

Fees of statutory auditor

The Audit Committee monitors, at consolidated level, the fees of the statutory auditor and of entities related to the statutory auditor. These entities are businesses having a relationship of professional cooperation with the statutory auditor or belonging to the statutory auditor’s network. Any additional audit procedures and advisory assignments are subject to the Audit Committee’s prior approval. For example, auditing

the statutory and consolidated financial statements and other reports.

The audit of the company’s financial position and of the financial statements has been assigned to the statutory auditor, KPMG Bedrijfsrevisoren, represented by Kenneth Vermeire. A mandate fee, which is explained in the financial statements, is paid for this.

In 2024, these fees and emoluments amounted to:

- for the company:
 - non-auditing assignments: EUR 3,781 excluding VAT
 - auditing assignments: EUR 37,381 excluding VAT
- for subsidiaries of the company:
 - non-auditing assignments: EUR 45,800 excluding VAT
 - auditing assignments: EUR 868,062 excluding VAT

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Diversity

Diversity and equal opportunities are essential for a healthy business environment. As a bank-insurer, Argenta strives to be a reflection of society so that all customers and staff feel at home at Argenta.

This is why Argenta gives every employee equal opportunities and the focus is on talent, regardless of gender, age, disability, belief, philosophy, marital status, birth, wealth, political conviction, trade union membership, language, health status, sexual orientation, physical or genetic characteristics, social, cultural or ethnic origin.

In its diversity policy, Argenta has target figures for the representation of the under-represented gender and it outlines a plan to achieve this target figure at the level of the Boards of Directors and senior management. The senior management is composed of the Executive Committee and N-1. The independent auditing functions are not included.

Promotion of diversity in the Board of Directors of Aspa is embedded in Section 31 of the Banking Act. The Banking Act makes it mandatory for diversity to be one of the criteria used to compose the statutory administrative body, and for a diversity policy to be developed as part of the suitability policy, including a quantitative target for representation of the under-represented gender in the statutory administrative body.

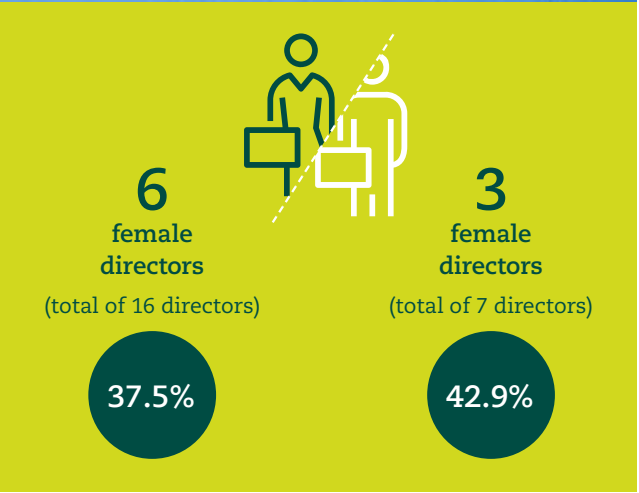
In addition, Section 7:86 of the WVV (Belgian Companies and Associations Code) specifies that in organisations of public interest as referred to in



Section 1:12(2) of the WVV (Belgian Companies and Associations Code), at least one third of the members of the board of directors must be of a different gender to the other members. The required minimum is rounded to the nearest whole number.

Of the sixteen directors who are active in the Argenta Group (across the various boards of directors), there are six female directors (37.50%). Argenta is therefore meeting its target of having at least 33% female directors.

Three of the seven members active on the Executive Committee of BVg, Aspa and/or Aras, are female (42.9%). Argenta is therefore meeting its target of having at least 33% female Executive Committee members.



In addition to gender, Argenta adopts a diversity policy on age, education and professional background, but it does not apply target figures for these areas.



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General disclosures

Basis for report

As of 2024, the CSRD (Corporate Sustainability Reporting Directive) is the new legal standard for reporting on sustainability each year. The sustainability information has been prepared on the basis of the European Sustainability Reporting Standards (ESRS) and integrated into chapter 6 of the Annual Report of the Board of Directors, see Belgian Companies and Associations Act (WVV⁵). Reporting within the scope of Article 8 of the EU Taxonomy Regulation has also been incorporated in this section.

Argenta Bank- en Verzekeringsgroep voluntarily reports its consolidated sustainability information on the 2024 financial year, although it is only legally required to report this information as of the 2025 financial year. The scope of consolidation applied for the Sustainability Statement is the same as the scope of consolidation for the financial statements. All statements about our strategy, policies and charters, actions and objectives refer to the consolidated group. Consolidation of all quantitative ESG data follows the above principles, unless otherwise stated in the description next to each reported data point in the tables in sections E, S and G.

Argenta aims to adopt an optimum approach in its activities involved in gathering data and information, setting up reporting processes, and ensuring governance and controls. Argenta chooses to assess its banking and insurance activities jointly in the area of governance and internal control, in accordance with the internal Governance Memorandum.

The contents of the sustainability statement were subject to a limited assurance report in accordance with ISAE 3000 (Revised). The Independent Auditor’s Report on a Limited Assurance Engagement can be found at the end of this report.

The consolidated sustainability statements are part of the company’s consolidated directors report, which was authorized for issue by the Board of Directors on March 25, 2025.

The Sustainability Statement is prepared on the basis of the double materiality analysis (hereinafter DMA), which was used to determine the material matters and associated impact, risks and opportunities (hereinafter IROs). We based our value chain analysis on the standards of EFRAG. The scope of the value chain was broadly determined on the basis of the participatory interests and other property, plant and equipment on Bank- en Verzekeringsgroep’s balance sheet. The operational activities and upstream and downstream value chain were then mapped.

The Sustainability Statement in chapter 6 relates to the following stakeholders in the value chain:

- In our downstream activities, we identify our customers (individuals and families in Belgium and the Netherlands), the counterparties in which we invest (via our investment portfolios) as well as communities and stakeholders on whom we have a broader social impact (including authorities and regulators, NGOs and interest groups).
- In our upstream activities, we identify our branches, suppliers, partners, shareholders, senior management and institutional investors.
- Our employees are incorporated under our operational activities.



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⁵Section 3:32(2). § 1. A parent company as referred to in Section 3:32(1) shall include in its annual report on the consolidated financial statements consolidated sustainability information that is required to provide insight into the Group’s effects on sustainability matters, and information that is required to understand how sustainability matters impact the group’s development, performance and position. The consolidated sustainability information shall be clearly specified in a section of the annual report on the consolidated financial statements specifically dedicated thereto. The parent company shall include the consolidated sustainability information in the group’s consolidated annual report based on European sustainability reporting standards established by the European Commission by means of delegated acts.

Methods and estimates

Accurate and reliable data is needed to understand sustainability information properly and to manage it adequately. As far as possible, Argenta relies on internally available data sources or primary data provided by external data providers.

In some cases, estimates and assumptions are used for the reporting of metrics and quantitative information. The main estimates and assumptions relate to the reporting under E-1 (climate change), especially with respect to greenhouse gas emissions (scope 3), which are subject to a high degree of measuring uncertainty due to restrictions in methodologies and data, including dependence on external data providers. As methods and data evolve, data sources and figures can become obsolete and updated methodologies and assumptions can lead to different conclusions. Argenta closely monitors the relevant developments and makes adjustments where necessary.

Our climate objectives and actions have been set in the long term, based on assumptions relating to the current market and policy context. This means there is a high degree of uncertainty and adjustment will be required as the context changes.

Information on the (external) data sources, methodologies and assumptions used is available in the chapter on [environment](#). The information on greenhouse gas emissions is set out [here](#).



Over the next few years, Argenta will do its utmost to improve access to data on its upstream and/or downstream value chain and to further enhance its quality. In the coming years, we assume there will be an increase in data quality, coverage ratio and data availability in the value chain, driven by the European regulatory context among other factors. The availability of new standards, sector standards and technical know-how will likewise contribute to better reporting quality.

In 2025, Argenta will further elaborate the limits of its ESG data strategy.

- We rely on external ESG data providers (Moody’s) to consult climate- and ESG-related information in the area of sustainable and responsible investment, so that we can calculate the financed emissions and Taxonomy of the investment portfolios, or to access information on physical climate risks.
- We rely on the PCAF⁶ methodology to calculate our financed emissions which we generate through our financing activities when individual data is missing.
- We use publicly available flood data to identify physical climate risks and collaborate with Rock Estate (BE) and Calcasa (NL) to collect this data. We use the data in the development and definition of risk metrics for flood risks for the Belgian and Dutch mortgage portfolios.
- We monitor claim sizes and frequencies within the insurance portfolio and further enhance them using specialised catnat model calculations.
- Desktop valuations, based on statistical models are used for valuing properties for our mortgages. For mortgages in Belgium, we do that with the help of Rock Estate. For mortgages in the Netherlands, we engage the services of Calcasa Portfolio Services.
- Obtaining and supplementing EPC (Energy Performance Certificate) data and energy scores for the mortgage portfolios is another key process in data collection.

Argenta has not exercised its option to omit specific information on intellectual property, know-how or results of innovation.

Time horizons

When defining the time horizons in this report, we use the definitions set out in ESRS 1 of the CSRD:

- For the short-term time horizon, we adopt the period of 1 year.
- For the medium-term time horizon, everything is between 1 and 5 years.

⁶ PCAF: Partnership for Carbon Accounting Financials



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• For the long-term time horizon, everything is over 5 years.

To assess the current impact under the DMA analysis, we adopted the horizon of 1 year. To assess the potential impact, we took the medium- and long-term horizons (<1-5 and >5) together. Although the medium- and long-term horizons were taken together for this first DMA analysis, impacts in the medium term and long term will be assessed separately in the next DMA analysis.

For the analysis relating to climate change, we based ourselves on the extensive internal materiality analysis of climate and sustainability risks, which we had already performed in past years in line with ECB expectations. These analyses and insights were integrated in the DMA analysis. The following time horizons were used for the materiality analysis of climate and sustainability risks:

- Short term: 0-5 years (in line with Argenta's business plan)
- Medium term: 6-10 years
- Long term: > 10 years

If there is any deviation in this report from the time horizons described above, this shall be explicitly stated.

Changes and errors

This report is the first reporting year under the CSRD legislation. Argenta does not publish any comparative information with the previous financial year, apart from the Taxonomy reporting. The comparative information with the previous financial year is not part of the independent auditor's limited assurance engagement.

Information incorporated by reference

Where information has been published in other parts of the annual report, the company has made use of the incorporation by reference concept, cross references have been inserted where relevant.

- Our business model and general corporate strategy are described in the following sections: [About Argenta](#), [Our strategy](#) and [Sustainability strategy](#).
- The following sections provide a description of the general [Risk policy](#) and the [Risk policy on sustainability](#).
- The Governance section describes the Argenta Group's general [governance](#), while the following links – [ESRS references](#) and [qualitative requirements under Pillar III](#) – will take you to the relevant overviews.

Governance of sustainability

For a number of years now, the role of the Board of Directors and of the advisory and supporting committees have clearly evolved. So has the expertise on sustainability.

The [Governance](#) section provides more detailed information on:

- The description, composition, general expertise and [expertise on sustainability](#) of the administrative bodies;
- The role of the administrative bodies in the definition and monitoring of sustainability objectives;
- Information provided to the administrative bodies and how they handle sustainability matters.

Internal reporting on sustainability

The Board of Directors is notified each month of the strategy, policy, KPIs and actions per department within the organisation, via the CEO's monthly report.

A number of meetings were held in 2024 focusing on sustainability matters:

- The double materiality analysis and results of material matters, presented and validated by the Executive Committee, Audit Committee and Board of Directors.
- The sustainability policy and sustainability action plan '24-'27, presented and validated by the Executive Committee and Board of Directors.
- Strategic offsite event on “sustainably standing out from the field”, presented and validated by the Executive Committee and Board of Directors.

The identified material matters are frequently discussed in the Executive Committee and various Board bodies. The sustainability policy and action plan addressing the overarching E, S and G policy, the actions and objectives Argenta intends to meet with respect to the identified material impact, risks and opportunities, for the period 2024 to 2027. Progress in the sustainability action plan and KPIs is monitored once a quarter using a sustainability dashboard. Progress within the organisation is monitored centrally by the sustainability manager, who provides the Executive Committee, Board, advisory and supporting committees with progress reports.

Once a year, an internal audit investigation is carried out relating to the sustainability policy and/or action plan. In 2024, an audit was performed relating to the reporting of financed emissions and Taxonomy. The results of the audit were

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discussed in the Audit Committee. In addition, a 2nd-line opinion on the DMA was issued by the NFRM department.

Sustainability topic	Matter	Executive Committee	Raad van bestuur, raadgevende en ondersteunde comités
E1 Climate change	<ul style="list-style-type: none">• Sustainability action plan (sustainability manager)• Monitoring of climate risks (Risk)• Translation of transition paths into sustainable homes strategy and investment policy (proposition directors)	x	x
S1 Own workforce	<ul style="list-style-type: none">• Sustainability action plan (sustainability manager)• HR policy (HR director)	x	x
S4 Consumers and end users	<ul style="list-style-type: none">• Sustainability action plan (sustainability manager)• Proposition strategies (proposition directors)	x	x
G1 Business conduct	<ul style="list-style-type: none">• Sustainability action plan (sustainability manager)• Governance policy (secretary-general, responsible policies and standards)• Integrity Charter (compliance officer)	x	x
Entity-specific matters: <ul style="list-style-type: none">• Investing responsibly• Investing locally• Innovation• Sustainable investment product range• Sustainable credit product range	<ul style="list-style-type: none">• Sustainability action plan (sustainability manager)• Sustainable investment policy (sustainability manager, asset managers)• Sustainable homes (proposition senior managers)	x	x



Lastly, other matters were also discussed in 2024, such as:

- Activities and sustainability report, including the Climate Report for FY’23 – presented and validated by the Executive Committee, Audit Committee, Board of Directors, Works Council and General Meeting of Shareholders
- ESG-risk rating of Sustainalytics – presented to the Executive Committee and Risk Committee
- Status update of climate action plan to ECB and JST (joint supervisory team) – presented to the Risk Committee
- Implementation of CSRD and status updates relating to integration of Sustainability Statement into the annual report – presented to the Board of Directors, Audit Committee and Board of Directors
- Sustainability Charter – presented to the Executive Committee
- The investment exclusion policy was presented and approved by the Executive Committee and Board of Directors at the end of 2023.

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Bonus culture

There is no bonus culture at Argenta – either among its management and staff or among its directors. So there are no annual variable remuneration, shares, stock options, deferred remuneration or other bonuses. There is likewise no bonus or remuneration for achieving ESG targets or climate-related targets (for example, within the scope of reducing GHG emissions).

Due diligence processes

Core elements of due diligence	Information incorporated by reference in document
Integration of due diligence in governance, strategy and business model	<ul style="list-style-type: none">• Strategy and business model• Governance of sustainability
Interaction with stakeholders	<ul style="list-style-type: none">• Stakeholder engagement• Employee commitment• Customer commitment• Supplier commitment: Argenta requests its suppliers to respect the main E, S and G principles relating to human rights, employment conditions, the prohibition of child labour, anti-discrimination, anti-corruption, environmental awareness and environmentally friendly technologies via the sustainability charter for suppliers. De UN Global Compact Principles gelden daarbij als algemene leidraad omdat die wereldwijd gedragen worden en gebaseerd zijn op internationale verdragen en conventies.
Identification and assessment of impact	<ul style="list-style-type: none">• Employee commitment• Anti-corruption and bribery• Sustainable investment principles
Monitoring and communication	<ul style="list-style-type: none">• Employee commitment

The due diligence processes referred to are set out in policies, standards, processes and/or procedures presented by the responsible departments and validated by the Executive Committee, the Board of Directors and its committees.

Risk management and internal control of sustainability reporting

A number of risks were identified in the course of preparing the Sustainability Statement, and a number of mitigating measures were also taken.

Risks relating to sustainability reporting	Mitigating actions
Inconsistencies with the financial information	<ul style="list-style-type: none">• Incorporation of controls, see 3 lines of defence in the CSRD task force• Involvement of the Regulatory Reporting department in the CSRD task force• Reporting of the financed emissions and Taxonomy is based on the financial reporting• Availability of CSRD reporting process (L3), including working instructions• Risk checks carried out on the reporting of financed emissions and Taxonomy• Internal audit investigation performed on financed emissions (retail) and Taxonomy reporting
Absence of automation of reporting processes	<ul style="list-style-type: none">• Incorporation of controls, see 3 lines of defence in the CSRD task force• Involvement of the data department in the CSRD task force• Availability of CSRD reporting process (L3), including working instructions• Risk checks carried out on the reporting of financed emissions and Taxonomy• Internal audit investigation performed on financed emissions (retail) and Taxonomy reporting• Organisation of information sessions to increase awareness in the organisation• Further elaboration of ESG data roadmap in relation to automation in 2025
Lack of data and data quality	<ul style="list-style-type: none">• Incorporation of controls, see 3 lines of defence in the CSRD task force• Involvement of the data department in the CSRD task force• Risk checks and monitoring via the risk registers• Organisation of information sessions to increase awareness in the organisation• Preparation of a data, data quality and data gaps inventory• Further elaboration of ESG data roadmap in relation to automation in 2025
Risk of greenwashing	<ul style="list-style-type: none">• Incorporation of controls, see 3 lines of defence in the CSRD task force• Preparation of disclosures provided by the responsible information providers (1st line)• Involvement of Compliance department in the CSRD task force
Regulatory developments	<ul style="list-style-type: none">• Incorporation of controls, see 3 lines of defence in the CSRD task force• Monitoring of developments by Sustainability team and Legal department

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Argenta wants to ensure that risk management is handled appropriately, which is why it adopts the principle of 3 lines of defence. The same applies to all risk types within Argenta’s risk-mapping process. By creating a CSRD task force, the 3 levels are represented.

For more information on how Argenta manages risks relating to impact, risks and opportunities, see [Risk policy on sustainability](#).

First line

The first line is responsible for delivering and validating the requisite qualitative and quantitative information for the annual report in a timely and accurate manner. This line assumes the role of information provider.

As part of the ‘data management’ risk type, the first line monitors risks relating to data access, data completeness and quality, the use of estimates and methodologies and the availability of upstream and/or downstream information across the value chain. These risks are also tracked via the risk registers of the relevant departments which are designated as data owner in the first line.

The Sustainability team functions as the first line support. It is responsible for coordinating the CSRD reporting and shares the monitoring of regulatory developments.

- The following departments are also involved in first line support.
- Regulatory Reporting assists in supervising consistency with the financial reporting and generally oversees the robustness of the reporting processes.
 - Data & Delivery focuses on quantitative ESG data as well, and advises the Sustainability team on the general approach to adopt.
 - The Legal Affairs department helps in the tracking of regulatory developments affecting sustainability reporting.

Second line

The second line is represented in the CSRD task force as follows:

- NFRM (Non-Financial Risk Management)
 - NFRM executes independent assurance tasks by performing a range of different analyses and providing advice.
- Risk & Validation
 - Risk & Validation delivers specific input for the ‘analysing transition and physical climate risks’ process (including transition paths) and carries out climate stress tests.
 - It actively focuses on checking climate-related reporting, such as the CSRD reporting and reporting within the scope of exclusion policy, financed emissions, EU Taxonomy, Pillar III and Solvency (QRTs).
 - Risk & Validation carries out timely quantitative risk checks. They then discuss the resultant recommendations with the business owners. Recommendations are logged and tracked in Pentana, the company-wide registration system.
- Compliance
 - Compliance checks whether the organisation and its employees adheres to governance requirements, reporting on compliance requirements to the regulator, and ethical rules of integrity and conduct.

Third line

At least once a year, Internal Audit carries out an audit in the context of sustainability. Sustainability reporting may also be included in the scope of an audit. For example, in 2024, an audit was conducted in the area of Taxonomy reporting.



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Business model and value chain

Argenta is a banker-insurer operating in Belgium and the Netherlands, with 1,250 employees and 1.83 million private and business customers.

Argenta Bank- en Verzekeringsgroep nv (BVg) is the management holding company of the Argenta Group and has the status of a mixed financial holding company.

Argenta Spaarbank has the status of a Belgian credit institution. Together with its branch office in the Netherlands and its subsidiaries Argenta Asset Management and Arvestar Asset Management, it forms the Argenta Group's Bank Pool. The Bank Pool focuses on attracting funds in the retail market in the form of savings and term accounts, attracting funds in the institutional market in the form of bonds, offering payment transactions via current accounts and reinvesting the collected funds in mortgage loans, securities and lending to local governments, public-private partnerships and real estate developers and operators. Units of Argenta funds, Argenta pension funds and Argenta DP funds managed by Arvestar are also provided.

The activities of Argenta Assuranties, a Belgian insurance company, comprise both life insurance, with branch 21 and branch 23 products, and non-life insurance (i.e. casualty, property and health), and in particular car insurance, private civil liability, fire, hospitalisation and legal assistance insurance.

In Belgium, the companies are subject to prudential supervision by the ECB/ NBB (Argenta Bank- en Verzekeringsgroep and Argenta Spaarbank) via the JST (joint supervisory team), by the NBB (Argenta Assuranties) and by the SRB (Argenta Spaarbank) via the IRT (internal resolution team), and to conduct supervision by the FSMA (Financial Services and Markets Authority). Argenta Asset Management is subject to supervision by Commission de Surveillance du Secteur Financier (CSSF). Argenta Asset Management is subject to supervision by the FSMA. Argenta Nederland falls under the integrity supervision of the DNB and conduct supervision of the AFM.



More detailed information on the Group structure can be found [here](#). Information on product range, services and key figures can be accessed [here](#). Information on the number of staff employed in Belgium, the Netherlands and Luxembourg is provided [here](#).

Our strategy

As a banker-insurer, Argenta sees it as its mission to make banking and insurance simple for families and business) so that they can make informed choices about improving their financial health. Since 2023, this has determined the direction of our strategy and how we achieve it.



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Our four strategic pillars guide the process of implementing our strategy 2023-2026

Customer relevance

We gear our services to customer needs on an ongoing basis, offering our customers the right know-how and solutions whenever they need it. We measure customer satisfaction using the NPS benchmarking tool. Our aim is to achieve an NPS score of 50 or more by 2026.

NPS:
 ≥ 50 +54
KPI: 2026 target KPI: 2024



Argentans

As Argentans, we are warm, family-oriented and committed, but we also take initiative and assume responsibility. If we excel at this, we can open up new horizons and make even more of a difference for customers. We measure ambassadorship among our employees using the eNPS score. We aim to achieve an eNPS score of 50 or more by 2026.



eNPS:
 ≥ 50 +41
KPI: 2026 target KPI: 2024

Professionalism

Customers put their trust in our bank. And they only do that if we are and remain a stable and reliable bank, even in the light of significant new and more stringent regulations and technological developments. That is why we constantly set the bar high for ourselves, manage our risks, and strive to achieve the best quality in everything we do and deliver.

SREP:
Top 25% Top 15%
KPI: 2026 target KPI: 2024 target



Simplicity

We instil simplicity in everything we do – in our products and communication, as well as in our processes and systems. By radically reducing complexity, we can set even keener prices and rates, and keep costs under control.



It can be that simple.

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Creating value for our stakeholders

We involve our stakeholders in the implementation of our strategy, by interacting with them at various stages in the process and measuring our progress via our strategic KPIs. For more detailed information, see [here](#). A description of our value chain is provided [here](#).

Based on the double materiality analysis (DMA) carried out in 2024, we identified the main areas of impact along the value chain:

- We can make a difference through the cash flows we manage for our customers (downstream). We can help support the transition to a sustainable economy by responsibly using these cash flows to finance sustainable projects:
 - Via our lending activities, we can help support the process of making homes and mobility more sustainable for our private customers. Our mortgage activities in Belgium and the Netherlands represent the largest part of our business activities.
 - Via our investment activities, we can breathe more financial life into companies aiming to meet ecological and social goals. This is how we can make a positive impact.
 - Via the exclusion policy, we want to reduce our negative impact to the greatest extent possible. The policy ensures that we do not invest in unethical and controversial activities.
- Via our insurance activities, we can protect our customers against all kinds of risks within their family, home or means of mobility. Over the last few years, the changing climate has presented financial institutions and their customers with major challenges.
- Via our daily banking offering too, the product policy we deploy can have a significant impact on the financial health of our customers, in terms of quality, transparency, integrity and security.
- In 2024, Argenta started to expand its Business proposition. The goal is to place a full range of products on the market, which support sole proprietorships and small businesses in achieving their financial needs. This project is still undergoing rapid development.

Sustainability policy

Sustainability is a core topic within Argenta’s strategy. Via our Sustainability Charter and sustainability policy, we are fully committed to the three pillars or ESG dimensions of sustainability.

- We instil simplicity in everything we do, with each other (Argentans) and for our customers (customer relevance) (S)
- We play our role by managing climate risks (professionalism) and we support customers (customer relevance) in the transition towards a climate-neutral society (E)
- We guarantee fair and transparent business operations (professionalism) (G)

Our strategic pillars and sustainability matters are clearly linked to our customers (customer relevance), employees (Argentans) and operations (focus on simplicity and professionalism). Our efforts relating to climate are translated, among other things, into a sustainable range of products for customers (with a link to S4 and G1), while climate risk management contributes to the bank’s reliability. Argenta’s policy, objectives and actions relating to these sustainability topics are described in more detail in the chapters on [Environment](#) (E1), [Customers](#) (S4), [Employees](#) (S1) and [Business conduct](#) (G1).

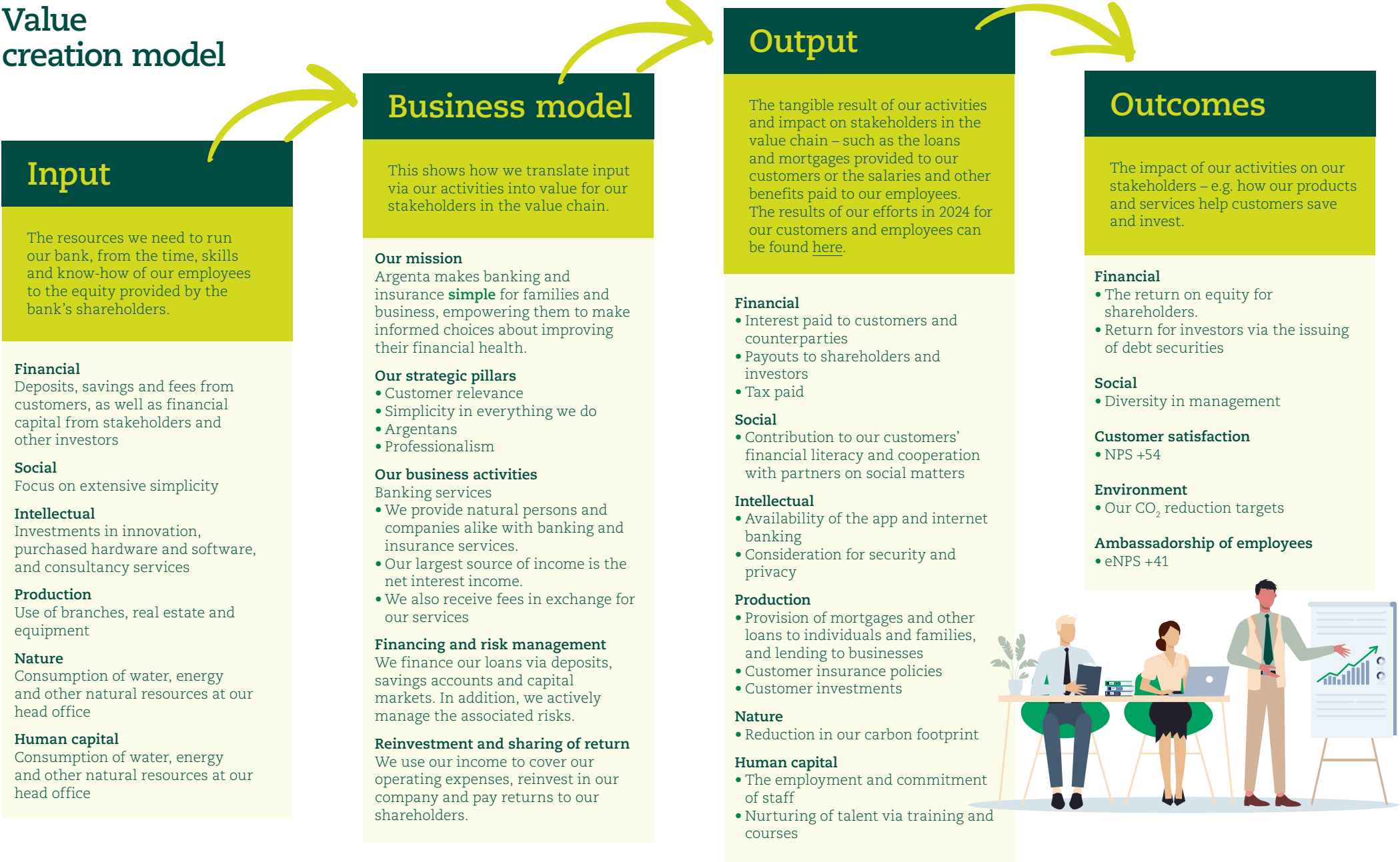
Our objectives and actions relating to the identified material impact, risks and opportunities are set out in the sustainability action plan. The sustainability action plan ’24-’27 was approved by the Executive Committee and Board of Directors in 2024 and is tracked by the administrative bodies.



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Value creation model



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Stakeholder interests and interaction

Argenta communicates with its stakeholders via a range of different channels, enabling it to map their needs and expectations. Interaction with stakeholders is also important in terms of the DMA analysis. In 2024, Argenta organised a general stakeholder survey on sustainability. You can access more information [here](#). The supervisory bodies also oversee the interests of the stakeholders. You can access more information [here](#).

Stakeholder	Interaction with stakeholder	Aim of interaction	Result
Customers	<ul style="list-style-type: none">• Customer research (via market research, interviews)• Stakeholder survey on sustainability• Branches and contact centre• Argenta website and digital channels• Complaint management	<ul style="list-style-type: none">• To be close by• To be an impact- and customer-driven organisation• To support customers so that they improve their financial health• To achieve a high level of customer satisfaction	We place the focus on customers in our strategy, which we then translate into our propositions and approach
Counter-parties via our investments	<ul style="list-style-type: none">• Via proxymoting (via ISS)• Direct interaction via investments in local projects	<ul style="list-style-type: none">• To emphasise the importance of ESG at the General Meeting of Shareholders and, in turn, boost the process of making the company more sustainable	<ul style="list-style-type: none">• We extend our sustainability vision to fund management activities• We want to make a positive impact via our own investment portfolios, by investing locally
Authorities and regulators / supervisory authorities	Direct consultation at national and supranational level, including via topical assessments, stress test, regular reviews, targeted reporting	To be compliant with regulations within the scope of transparency, product, risk and conduct rules, etc.	<ul style="list-style-type: none">• We keep our finger on the pulse of regulations and expectations of regulators, and translate these into our actions• We maintain an appropriate risk policy
NGOs and interest groups	<ul style="list-style-type: none">• Surveys and regular screening based on publicly available information or direct interactions	To keep our finger on the pulse of key social matters and maintain dialogue with interested parties	<ul style="list-style-type: none">• We translate this into the sustainable investment policy• We monitor our ESG performance via ESG risk management

Branches	<ul style="list-style-type: none">• Stakeholder survey on sustainability• Branch surveys• Direct interaction with head office via various consultative bodies	<ul style="list-style-type: none">• To be close by• To foster connectedness with Argenta via commitment and ambassadorship	Our branches form part of our strategy and are a crucial channel for ensuring proximity with customers.
Suppliers	<ul style="list-style-type: none">• Direct relationship• Supplier diligence processes	<ul style="list-style-type: none">• To have our partners subscribe to the same values with respect to sustainability• To build lasting relationships	We ask our suppliers to sign the sustainability charter .
Partners	Direct relationship with <ul style="list-style-type: none">• Red Cross• Straatvinken• Slim naar Antwerpen• Women in Finance	To cooperate within the scope of social matters	We enter into partnerships so that we can work together in the context of social causes
Shareholders	<ul style="list-style-type: none">• Stakeholder survey on sustainability• Direct interaction via the Board of Directors	To achieve sustainable growth for Argenta, taking adequate account of returns	The strategy is supported by the shareholders
Senior management	<ul style="list-style-type: none">• Stakeholder survey on sustainability• Direct interaction via internal consultation structures	To implement the strategy in accordance with sustainable growth	We convert the strategy into concrete objectives and actions
Institutional investors	Direct interaction via investor calls	To map the expectations of investors so that we can respond to them with a view to ensuring healthy foundations	We integrate this into our wholesale funding strategy
Employees	<ul style="list-style-type: none">• Stakeholder survey on sustainability• Employee surveys• Social consultative bodies• CPBW• Direct consultation with managers• Confidential contact persons	<ul style="list-style-type: none">• To be close by• To foster connectedness with Argenta via commitment and ambassadorship• To focus on talent and development	Together with our employees, we work to create an impact-driven and customer-centred organisation

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Process to identify and assess material sustainability matters

The double materiality analysis (DMA) conducted in the course of 2023 and 2024 underlies the Sustainability Statement in this report. Choices were made throughout the process, based on the interpretation of the regulations and EFRAG implementation standards.

Using this analysis, Argenta was able to map material matters and then link the relevant impact, risks and opportunities (both potential and actual) to them.

Throughout the process, consideration was given to the principle of double materiality:

- Material impact: what is the impact Argenta could have on a sustainability matter in terms of the people, society and good governance.
- Financial impact: what is the financial impact a sustainability matter could have on Argenta in terms of risks and opportunities.

The DMA analysis was carried out at the level of the Argenta Group. The analysis took into consideration the activities of the head office in Belgium, the Netherlands and Luxembourg.

For a better understanding of the context in which the DMA exercise was performed, the link with strategy and a description of the key stakeholders in the value chain, please refer to the information on our [sustainability strategy](#).

Process

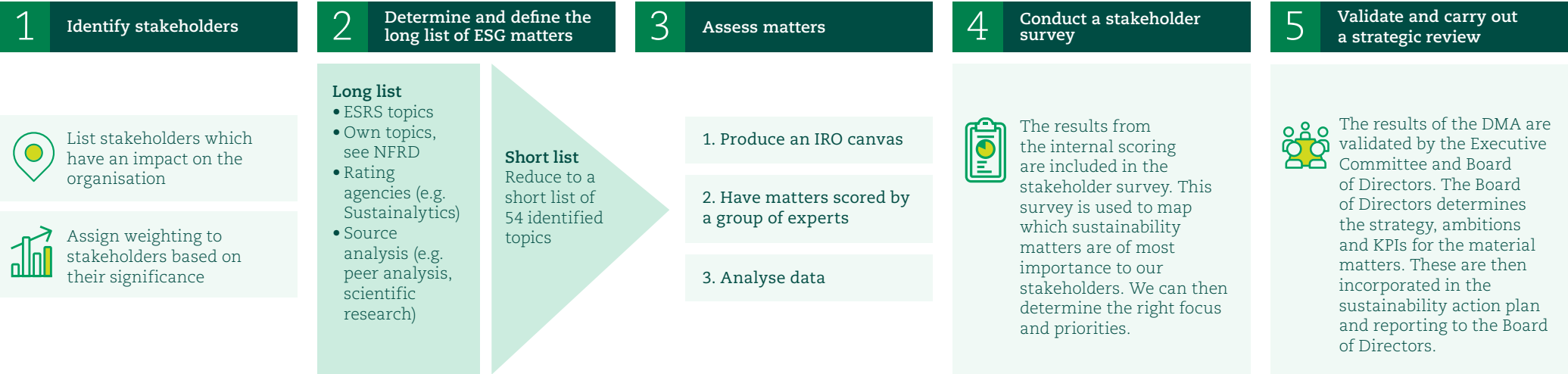
The DMA exercise involved following a delineated process to obtain an overview of Argenta’s material matters:

1 Identify stakeholders

All relevant stakeholders are mapped using the following parameters:

- Link between the organisation and the stakeholder (affected stakeholder or user of the sustainability information)
- Estimate of Argenta’s impact on the stakeholder and vice versa

Identifying these stakeholders has helped to assess the impact, risks and opportunities in a qualitative way and to pinpoint them in the value chain.



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2 Determine and define ESG matters

In parallel to identifying the stakeholders, we determined and defined an extensive list of ESG matters of every kind. This list was a combination of all ESRS matters (down to sub-sub-level) and topics which have already been incorporated in a policy over the last few years and have been reported on within the scope of the NFRD. We also carried out extensive market research into relevant topics, taking into account topics such as those gauged by ESG rating agencies and NGOs. We assigned a definition to each topic in this long list, based on international treaties or legal texts. If no such text was available, we adopted internal definitions. The definitions were validated by the internal group of experts involved in the DMA process. This group of experts was composed of representatives from throughout the organisation with the relevant expertise.

After carrying out a qualitative assessment, the sustainability team whittled the long list of matters down to a shorter list of matters to be analysed in more detail. Justification was provided for each matter eliminated from the list. The first filtering process took into account Argenta’s business model, the strategy, operational activities, link to internal policy documents, sector initiatives, regulations, preliminary analyses already performed, scientific research and scope of the various matters.

3 Assess matters

Once the preliminary selection had been made, the identified matters were described in more detail in terms of their impact, risks and opportunities using an IRO canvas template. The link to the value chain was also mapped for each matter. This canvas template was produced in conjunction with the internal group of experts under the coordination of the sustainability team. No activities generating a high risk of negative impact were flagged within our own activities and within the value chain. No sustainability risks were therefore given priority over other types of risks.

- **Impact materiality**
The internal experts assess each matter by assigning it a score, taking into account the ‘scale’ and ‘scope’ parameters for positive impact and the ‘scale’ and ‘scope’ parameters and ‘irremediable character’ (= the ‘severity’) for negative impact. The ‘likelihood’ parameter was also taken into consideration for potential impacts.

The internal experts were told to assign a higher impact score when assessing a sustainability topic, if there was (a possibility of) a violation of human rights, employment rights, unethical business practices, etc. or failure to align with the Paris climate targets. That was based on a qualitative estimate by the experts.

No specific priority was assigned for matters with a negative impact on the basis of ‘severity’, as one impact score was obtained which was then adjusted to the thresholds. There was likewise no specific priority assigned for positive impact based on scale and scope, as scale and scope are not assessed individually, but as one whole. The likelihood score was not included in this calculation because of its complexity.

- **Financial materiality**
Financial materiality was qualitatively assessed in terms of financial effects on the company, as described in ESRS 1. A material effect exists if risks or opportunities arise from a sustainability matter, which have an impact on development, financial position, financial performance, cash flows, access to financing or capital costs. The climate change matters were assessed with due regard for the climate risk analysis.

A description of the analysis relating to climate change can be found here. Possible financial effects for other matters have not yet been mapped. Over the next few years, further analyses will be carried out to identify, monitor and prioritise them.

The dependencies between impact, risks and opportunities were included in the assessment by the experts, based on an assessment drawing on their specific expertise. Over the next few years, focus will be placed on further refining the dependencies between impact materiality and financial materiality.



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4 Conduct a stakeholder survey

A stakeholder survey was carried out using an external research agency. The following stakeholders were asked questions in the survey: the general market, Argenta customers, head office employees, branch network employees, the Board of Directors and the Executive Committee.

The questions were based on the sustainability survey (carried out every two years since 2017). This survey was supplemented with questions linked to the identified sustainability matters, as assessed by the internal experts in accordance with the principle of double materiality. The results of the stakeholder survey provide insight into the importance of sustainability matters for the stakeholders and how they themselves estimate the impact of the matters. The survey was carried out as a strategic tool for determining priorities in the short and long term for Argenta. The results have not shown any inconsistencies with the assessment by internal experts and have not had a direct impact on the findings of the DMA exercise.

5 Validate and carry out a strategic review

The DMA was coordinated by the sustainability team. The internal group of experts supported them in assessing the matters and completing the IRO canvas template. The external stakeholder survey was organised in cooperation with an external agency specialising in market research.

The complete process and results were validated by the Executive Committee and Board of Directors. The DMA will be updated every two years.

Risk controls and general monitoring

For information on risk management and internal control procedures, please see [here](#).

The identified material impact, risks and opportunities are generally monitored via the sustainability action plan. The sustainability action plan '24-'27 was approved by the Executive Committee and Board of Directors in 2024 and is tracked by the administrative bodies.

Over the next few years, the process of identifying, assessing and mitigating impact, risks and opportunities will be further integrated in the general [risk policy on sustainability](#) and in line with the general [governance](#) of Argenta.

Overview of material sustainability matters

The following table links the material matters to ESRS standards **E1 climate change, S1 own workforce, S4 consumers and end users and G1 business conduct**. It also shows the entity-specific matters, which are unique to the business context of Argenta.

Matter	Positive impact	Negative impact	Risk	Opportunity
E1 Climate change	-	Sustainable credit product range	Climate mitigation Climate mitigation	Climate mitigation Sustainable credit product range
S1 Own workforce	Correct remuneration Engagement Training and development Bonus culture	-	-	-
S4 Consumers and end-users	Klant-tevredenheid Verantwoorde marketing-praktijken	Data security Digital services	Data privacy Data security Social inclusion	Customer satisfaction Social inclusion Responsible marketing practices
G1 Business conduct	Anti-corruption and laundering Corporate culture Company purpose Financial health Principle of good governance Sustainable investment product range	Corporate culture Company purpose ESG risk management Financial health Principle of good governance Sustainable investment product range	Anti-corruption and laundering Financial health Principle of good governance	Anti-corruption and laundering Corporate culture Financial health Principle of good governance Sustainable investment product range
Entity-specific matters		Investing responsibly and locally Innovation	Innovation	Innovation



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A detailed description of the identified impact, risks and opportunities and their link to the value chain can be found in the [Environment](#), [Consumers and end-users](#), [Own workforce](#) and [Business conduct](#) chapters.

In each section, we examine in greater detail the effects of our impact and risks, and the link to the resilience of the strategy and business model to manage risks and exploit material opportunities. Operational expenditure and capital expenditure associated with the material sustainability matters are incorporated into the current budgets provided within the scope of implementing the strategy. There is no significant operational expenditure or capital expenditure in 2024. In 2024, Argenta generated EUR 1.5 billion through issuing green bonds under the Green Bond Framework, for financing sustainable homes in Belgium and the Netherlands.

The findings of the material analysis with respect to climate change can be found in [materiality analysis of climate and sustainability risks](#). Climate stress tests were used to analyse the impact on Argenta. More detailed information can be found [here](#). In the financial statements forming part of this report, Argenta reports on the current financial effects arising from the material risks relating to climate adaptation and climate mitigation for the mortgage lending activities in Belgium and the Netherlands. More detailed information can be found in the discussions of the [financial statements](#).

The other environment-related domains of E2 (“Pollution”), E3 (“Water and marine resources”), E4 (“Biodiversity and ecosystems”) and E5 (“Resource use and circular economy”) were found to be not material. The product range offered by Argenta is aimed at individuals and families with the largest share of company activities being attracting savings and providing mortgage loans. There is therefore no link or a limited impact because of the nature of our business model and activities. This assessment was validated based on the qualitative estimate made by an internal group of experts, the Executive Committee and the Board of Directors. For that reason, no further screening was carried out into the possible polluting effects or impact on biodiversity. Given the limited link and impact, no process of interaction was entered into with surrounding communities. The materiality analysis of climate and sustainability risks investigated other environmental risks, including pollution, water and waste.



The other social domains – S2 “Workers in the value chain” and S3 “Affected communities” – were likewise found to be not material. The link between the business activities of Argenta and these matters is limited. The impact Argenta could have on its branch network, under S2, and vice versa, is limited because of the highly regulated environment in which we operate.

Information requirements in ESRS falling under the Sustainability Statement

The double materiality analysis, as described in the [process](#), identifies 22 material matters. During the assessment phase, threshold values were proposed to determine the materiality. The material matters are linked to the reporting requirements, based on a qualitative assessment, so that the extent of the disclosures can be ascertained. The reporting requirements incorporated in chapter 6 reflect the material matters.

An overview of the disclosure requirements and information incorporated in the report by reference can be accessed [here](#). The ESRS standards that were found to be not material are not included in the overview.

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Environmental

We live in a world which is and will remain unpredictable. Global warming is a fact: constantly rising temperatures and extreme weather conditions, with consequences for the environment and for us as human beings. We will remember 2024 as the hottest year on record so far, with global temperatures exceeding the 1.5°C limit for the first time.

The changing climate presents financial institutions with major challenges. The need for an adequate sustainability and risk policy is increasing all the time. For our customers, too, the transition to a climate-neutral society comes with many challenges. We therefore put the interest of a socially just transition and the support of our customers at the heart of our sustainability policy.



Understanding climate change

Material risks and opportunities

The DMA analysis found climate risk to be material – for climate adaptation as well as climate mitigation. On the other hand, climate mitigation can also be seen as an opportunity for Argenta.

Climate adaptation means that we have to adjust to the current and future consequences of climate change. We can identify both physical and transition-related climate risks:

- Physical climate risks: these are the direct physical effects (acute and chronic) impacting our business activities.
- Transition-related climate risks: these are the risks associated with the timing and speed of the transition to a more sustainable economy in the area of climate, and the impact on our business activities.

Climate mitigation means that we have to restrict the current and future consequences of climate change as much as we can. So the transition to a climate-neutral society through decarbonisation is of crucial importance.

During the DMA analysis, we identified the transition risk as material for climate mitigation. Opportunities associated with climate mitigation were likewise found to be material.

Climate mitigation is therefore important for Argenta’s business model because of the financed emissions we generate via our downstream activities. We invest in shares, loans and bonds of companies via our investment portfolios and, in doing so, finance a share of the emissions generated by those companies. Argenta also provides loans to private customers for the financing of assets such as family homes and vehicles in Belgium and the Netherlands. By decarbonising the financed emissions, we mitigate the climate-related risks, take advantage of business opportunities and reinforce the resilience of our strategy:

- Our investment strategy and the accents we add to it can have an impact on the financial performance of our investment funds. As a result, there is a possible risk of impairments on investments. Conversely, we can also take optimum advantage of investment opportunities because the value for the customer increases.



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- Our insurance strategy can also generate a financial impact, for example if climate-related losses increase, the number and amount of premiums to be paid out will increase accordingly.
- Via the lending strategy and the way in which Argenta shapes its acceptance and pricing policy and through the choices Argenta makes about whether or not to invest in energy-efficient projects and renovations. Argenta’s sustainable credit product range plays a crucial role in this process. By taking social aspects and issues into consideration, such as affordability and feasibility, Argenta can contribute to a long-term relationship with customers and to general customer satisfaction.

The emissions we generate via our operational activities are negligible compared to the financed emissions.

The following section goes into greater detail about the [process](#) and analyses involved in the DMA and our insights relating to financial effects and risks for Argenta.

Financial effects from risks and opportunities

To align our strategy with the climate challenges, we must identify all the relevant climate risks and opportunities and properly understand the impact and resilience of the strategy and the business model. We have made considerable efforts in previous years, but we took further steps in 2024 too.



Organisation of materiality analysis of climate and sustainability risks

In line with the ECB’s expectations, an extensive materiality analysis is carried out each year to examine climate and sustainability risks. Based on this analysis, we assess the impact of climate and sustainability risks on the risk profile of our business activities, i.e. the banking, insurance and asset management activities. We focus on both financial risks (such as the credit risk, underwriting risk, market and liquidity risk) and business risks. But the non-financial risks are also examined. This involves looking at the compliance risk, sourcing risk, business continuity risk and data management risk. The results of the materiality analysis of climate and sustainability risks were integrated into the DMA analysis and are in line with the expectations of the CSRD.

As part of the exercise, we give consideration to a range of climate scenarios and time horizons. We map the climate-related impact and the impact of social and governance-related risks.

Materiality is determined based on a number of factors, such as portfolio size, risk profile, pockets of risk and the results of stress tests.

The following time horizons are taken into consideration in the materiality analysis of climate and sustainability risks:

- Short term: 0-5 years
- Medium term: 6-10 years
- Long term: > 10 years

The following materiality thresholds are taken into account, aligned with the risk definitions and thresholds:

- Size of portfolio and pockets of risk:
 - > 20% of balance sheet total = material risk
 - > 5% of balance sheet total = medium risk
 - > 1% of balance sheet total = limited risk
 - < 1% of balance sheet total = not material
- Results of stress tests:
 - > EUR 1 million loss = material risk
 - < EUR 1 million loss = not material



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The materiality of the potential impact of climate and environmental risks on the risk profile can evolve over time and may differ depending on the climate scenario for a number of different reasons:

- The exposure within the portfolio which is exposed to climate and environmental risks can evolve over time.
- The likelihood that a climate- or environmental-risk event may arise over time or is time-dependent.
- By design, the NGFS climate scenarios⁷ differ in the way in which climate and environmental risks are expected to materialise. We make a distinction between the ‘orderly’ scenario⁸, the ‘disorderly’ scenario⁹ and the ‘hot house’ scenario¹⁰.

Financial risks are considered material if they meet one of the following conditions:

- A stress test analysis is available and the result represents a loss of over EUR 1 million
- No stress test analysis is available but the portfolio exposure is considered material. In such cases, the risk is estimated as ‘expert-based’

Risk & Validation carries out risk-based controls once a year as part of a risk check programme for financial risks. In our analysis of climate and sustainability risk, we focused on the following areas among others:

- Pillar 3 reporting
- QRT reporting (Quantitative Reporting Templates)
- Taxonomy reporting
- Financed emissions
- Decarbonisation
- Investment exclusion policy
- Sustainability reporting (via the Investment Consultation)
- PAI reporting (Principal Adverse Indicators) under the SFDR

These risk checks culminate in recommendations which are discussed with the business. The remedial actions to be taken are also discussed. We log the recommendations and monitor them via an internal registration and tracking tool.

We estimate the materiality of non-financial risks based on a risk matrix forming part of the NFRM dashboard. The assessment method results in various types of risk exposure (likelihood and impact), ranging from very low to very high. Inherent risks with a ‘very high’ impact are considered as material.

For a definition of ESG risks, please see [risk policy on sustainability](#).

Monitoring of risks

As part of the RAF reporting, we report to the GRC and Risk Committee about any exceeded RAF metrics and RAF flashing lights. These have been defined as important key monitoring figures for monitoring climate risk and climate-risk-related risks.

In addition to the RAF monitoring, we also track a number of metrics or indicators that are not reported to the GRC via the RAF. Each quarter, the credit risk dashboard shows a number of key figures relating to the loan portfolios. Quarterly figures on climate and sustainability aspects relating to the investment portfolios of Aspa and Aras are also reported to the Investment Consultation, which in turn reports to the ALCO.

For more information on Argenta’s risk policy on sustainability, please see [here](#).

Materiality analysis of climate and sustainability risks in 2024

The materiality analysis of climate and sustainability risks which we conducted in 2024¹¹ shows that there is material financial impact for the mortgage loan portfolios in Belgium and the Netherlands. We have established that these portfolios are sensitive to the transition-related effects of climate change as well as to physical climate risks.

We have also established material impact for the investment portfolios (transition risk and physical risk), the underwriting risk (physical risk), and the liquidity risk and business risk (transition risk in each case).

Information on objectives and actions in the management of risks relating to the bank’s mortgage loan activities and investment portfolio is provided under [climate strategy](#).

⁷Network for Greening the Financial System.
⁸The orderly scenario assumes climate policies are introduced early and become gradually more stringent. Both physical and transition risks are relatively subdued.
⁹The disorderly scenario explores higher transition risks due to policies being delayed or divergent across countries and sectors.
¹⁰The hot house scenario assumes that climate policies are implemented in some countries or sectors, but that global efforts are insufficient to halt global warming. This results in severe physical climate risks with irreversible impacts.
¹¹Argenta makes partial use of the transitional provision with regard to the anticipated financial effects, cf. article 67a E1-9 and as stipulated under appendix C of the CSRD. For the report in 2024, Argenta limits itself to qualitative explanations.

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To analyse non-financial risks, we consider the following (inherent) risks as material (inherent impact = very high):

- Sourcing risk
- Business continuity risk
- Compliance risk
- Data management risk
- Brand & sustainability risk



Inherent risk assessment	E			S	G
	Climate risk transition risk	Climate risk physical risk	Other environmental risks	Social risks	Governance risks
Non-financial risks	Impact assessment Material Impact: very high				
Sourcing risk	x	x		x	x
Business continuity risk		x			
Compliance risk	x				x
Legal & regulatory risk					
Fraud risk					
Data management risk	x				x
Strategic & change risk					
Information security & cyber risk					
IT risk					
Brand & sustainability risk					x
HR risk					
Process risk					

For the above material risks, we identified measures and focus areas already being mitigated, which are monitored. In the short, medium and long term, the inherent impact remains the same if a risk arises. The likelihood of these risks materialising in the short, medium and long term will decrease as we further develop and monitor the identified measures and focus areas.

In the following section, we explore in greater detail the results and insights for the Argenta Group’s various business activities, based on the various climate scenarios (orderly, disorderly and hot house scenarios):

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Orderly scenario	Transition risk			Acute physical risk			Chronic physical risk			Other environmental risks		
	ST	MT	LT	ST	MT	LT	ST	MT	LT	ST	MT	LT
Mortgage loan activities Aspa	x	x		x	x							
Mortgage loan activities Aras												
Investment activities Aspa	x	x		x	x		x	x				
Investment activities Aras	x	x										
Non-life insurance activities				x	x							
Life insurance activities												
Health insurance activities												
Wholesale funding	x	x										
Asset management activities	x	x										

Disorderly scenario	Transition risk			Acute physical risk			Chronic physical risk			Other environmental risks		
	ST	MT	LT	ST	MT	LT	ST	MT	LT	ST	MT	LT
Mortgage loan activities Aspa	x	x		x	x							
Mortgage loan activities Aras												
Investment activities Aspa	x	x		x	x		x	x				
Investment activities Aras	x	x										
Non-life insurance activities				x	x							
Life insurance activities												
Health insurance activities												
Wholesale funding	x	x										
Asset management activities	x	x										

Hot house scenario	Transition risk			Acute physical risk			Chronic physical risk			Other environmental risks		
	ST	MT	LT	ST	MT	LT	ST	MT	LT	ST	MT	LT
Mortgage loan activities Aspa				x	x	x						
Mortgage loan activities Aras												
Investment activities Aspa				x	x	x	x	x	x			
Investment activities Aras												
Non-life insurance activities				x	x	x						
Life insurance activities												
Health insurance activities												
Wholesale funding												
Asset management activities												



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Mortgage loan activities Argenta Spaarbank

In the analysis of transition risk, we note that, for Belgian and Dutch mortgage loans, materiality evolves over time and differs according to the climate scenarios.

The following elements were incorporate in the analysis:

- **Exposure**
The mortgage loan portfolio will undergo a transition over the next few years in terms of energy efficiency and CO₂ emissions (financed emissions), see the long-term transition scenarios of the ECB stress tests performed in 2022 and the transition paths.
- **Climate scenarios**
Government policy determines the transition within the mortgage loan portfolios to a significant extent. Governments will continue to intervene in terms of determining policy, creating a transition risk (for example, due to imposed renovation obligations). In the long term, we assume that the transition to a climate-neutral society will have taken place in both these scenarios and transition risk will hardly exist because the transition will be behind us, see the transition paths and long-term transition scenarios (2022 ECB stress test). Focus in the hot house scenario lies on the physical climate risk. No transition will take place, because borrowers will have no incentive to purchase energy-efficient homes or undertake energy renovations. We consider the transition risk in this scenario to be not material.

The materiality of the physical climate risk for Belgian mortgage loans also evolves over time and differs depending on the climate scenarios. We included the following elements in the analysis:

- **Exposure**
The development of exposure within the mortgage loan portfolio with a high or medium flood risk may change in response to a targeted acceptance policy. An analysis carried out by Rock.Estate shows that the exposure of homes financed by Argenta with a medium and high flood risk does not significantly differ from the Flemish average. The percentage exposure and materiality will not significantly change, unless Argenta pursues a targeted acceptance policy with the aim of avoiding properties in zones with a medium and high flood risk. However, the exposure could change as a result of appropriate government policy measures (see scenarios).

- **Likelihood**
The likelihood of acute and chronic flood risk will increase in the future if no additional policy measures are taken. The acute flood risk is already apparent now, whereas the chronic flood risk (rising sea level) will not become apparent until in the longer term. The likelihood of the chronic climate risk is calculated on the basis of the 2050 climate projections, so we consider it as a long-term risk.
- **Climate scenarios**
The climate scenario has a significant impact on flood risk. In the orderly and disorderly scenarios, the government takes infrastructural measures to reduce flood risk (climate adaptation) and pursues a policy aiming to mitigate the impact of climate change (climate mitigation). In the hot house scenario, the physical climate risk manifests itself through a complete lack of policy measures. In the (dis)orderly scenario, the physical risks are reduced in the long term to not material. The chronic flood risk (rising sea level) will become apparent in the long term if no appropriate policy measures are taken. The last one is the hot house scenario.

The materiality of the physical climate risk for Dutch mortgage loans likewise evolves over time and differs according to the climate scenarios. We included the following elements in the analysis:

- **Exposure**
The development of exposure within the mortgage loan portfolio with a high or medium flood risk may change in response to a targeted acceptance policy. The percentage of exposure and materiality will not significantly change, unless Argenta pursues a targeted acceptance policy with the aim of avoiding properties in zones with a medium and high flood risk. However, the exposure could change if appropriate government policy measures are taken (see scenarios).
- **Likelihood**
The likelihood of acute and chronic flood risk will increase in the future if no additional policy measures are taken. The acute flood risk is already apparent now, whereas the chronic flood risk (rising sea level) will not become apparent until in the longer term. The likelihood of the chronic climate risk is calculated on the basis of the 2050 climate projections, so we consider it as a long-term risk.
- **Climate scenarios**
The climate scenario has a significant impact on flood risk. In the orderly and disorderly scenarios, the government takes infrastructural measures to reduce flood risk (climate adaptation) and pursues a policy aiming to mitigate the impact

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of climate change (climate mitigation). In the hot house scenario, the physical climate risk fully manifests itself primarily through a lack of policy measures. In the (dis)orderly scenario, the physical risks are reduced in the long term to not material. The chronic flood risk (rising sea level) will be perceptible in the longer term if no appropriate policy measures are taken. The last one is the hot house scenario.

We currently estimate the materiality of other environmental risks within the Belgian and Dutch loan portfolios as not material. We assume that the elements we have taken into consideration will not change significantly in the future or under different climate scenarios.



Mortgage loan activities of Argenta Assuranties

The materiality of the transition risk of the Dutch mortgage portfolio will improve in the future and will even become not material in the long term. We report on these developments for the banking portfolio where we expect the climate risk to evolve from material to not material in the long term. The transition risk of the Dutch mortgage portfolio on the insurer’s balance sheet is already not material and is expected to remain so.

Within the banking portfolio, we expect the physical climate risk to evolve over time (see above). The physical climate risk within the Dutch mortgage portfolio on the insurer’s balance sheet is already non material and is expected to remain so for the acute flood risk.

The chronic flood risk is likewise not material within the banking portfolio and the insurance portfolio. However, under the hot house scenario, it will evolve into a material risk in the long term. The materiality of other environmental risks is also currently estimated as not material. We assume that the elements we have taken into consideration will not change significantly in the future or under different climate scenarios.

Investment portfolios of the bank and insurance company

The materiality of the transition risk evolves over time and differs according to the climate scenarios. We included the following elements in the analysis:

- **Exposure**
We use the carbon transition score (RAF limit) to map the CO₂ footprint and transition risk. Argenta already adopts a strict exclusion policy according to which companies operating in the extraction of fossil fuels are excluded. Over the next few years, Argenta will continue to invest in sectors which are strongly positioned in the transition to a green economy, such as utilities, companies operating in the waste and water sector, construction and real estate companies, etc.

NB: when analysing transition risk from a time perspective, consideration must be given to the duration or term of the portfolios held. If certain sectors or counterparties within the investment portfolio are inadequately transitioning to a green economy (stranded assets), Argenta has the flexibility to cut positions and redirect them to other sectors and/or counterparties.

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• Climate scenarios

The transition risk is considered to be material in the orderly and disorderly scenario, both in the short term and medium term. Industry and governments will continue to intervene in terms of determining policy, creating a transition risk (for example, due to changing emission standards, energy efficiency, etc.). In the long term, we assume that the transition to a low-carbon economy will have taken place in both scenarios and transition risk will hardly exist because the transition will be behind us. Focus in the hot house scenario lies on the physical climate risk and we do not identify any material transition risk. In other words, no transition will take place, because industry is not given any incentive to produce in a climate-friendly way. We consider the transition risk in this scenario to be not material.

The materiality of the physical climate risk likewise evolves over time in accordance with the climate scenarios. We therefore took the following elements into account:

• Exposure

The development of exposure within the investment portfolio with a high physical climate risk may change in response to a targeted investment policy. Furthermore, we expect companies and governments to take measures to reduce the impact of physical climate risks on business processes, for example by companies relocating their production sites to regions less affected by the physical climate changes.

NB: when analysing physical climate risks, consideration must be given to the duration of the portfolios held. If certain sectors or counterparties turn out to be affected by the physical effects of climate change to an above-average extent, Argenta can redirect its positions to other sectors, counterparties or regions.

• Likelihood

The likelihood of physical climate risks (acute and chronic) will increase in the future if government and industry do not take additional policy measures. Acute (flood, storm) and chronic (heat, drought) climate risks are currently already apparent in industry in numerous regions.

• Climate scenarios

In the orderly and disorderly scenarios, government and industry take appropriate measures to reduce the physical climate risk (climate adaptation) and pursue a policy aiming to mitigate the impact of climate change (climate

mitigation). In the hot house scenario, the physical climate risk fully manifests itself through a lack of policy measures. In the orderly and disorderly scenario, the physical risks are reduced in the long term to not material. But that will not happen in the hot house scenario.

The materiality of other environmental risks within the investment portfolio is currently estimated as not material. We measure this using environmental metrics in the green zone. The number of counterparties with a poor environmental score (RAF limit) is very low. What is more, counterparties that are criticised for environment-related controversies are excluded in accordance with the exclusion policy. It is also important to know that the duration of the investment portfolio is limited and that there is flexibility to sell positions.

We assume that the above elements will not change in the future or under different climate Scenario.



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Non-life insurance portfolio

The transition risk for the non-life insurance portfolio (Argenta Assuranties) is estimated as not material. We assume that this estimate will not change in the future or under different scenarios.

However, the materiality of the physical climate risk evolves over time and varies in accordance with the climate scenarios. We took the following elements into account in the analysis:

- **Exposure**
The exposure of non-life insurance (motor insurance, but mainly fire insurance) depends on the extent to which Argenta manages to cover the catastrophe risk via reinsurance contracts. We can further reduce this exposure by introducing an appropriate acceptance and pricing policy, in accordance with which we avoid granting insurance for buildings located in flood areas and we pass on the higher risks in the pricing.
- **Likelihood**
The likelihood of physical climate risk (acute and chronic) will increase in the future if no additional policy measures are taken. The acute climate risk (including flood risk and storm risk) is already apparent now, whereas the chronic climate risk (rising sea level, impact of climate on soils) will not become apparent until in the longer term.
- **Climate scenarios**
The climate scenario has a significant impact on physical climate risk. In the orderly and disorderly scenarios, the government takes infrastructural measures to reduce the climate risk (e.g. flood risk) (climate adaptation) and pursues a policy aiming to mitigate the impact of climate change (climate mitigation). In the hot house scenario, the physical climate risk fully manifests itself through a lack of policy measures. In the (dis)orderly scenario, the physical risks are reduced in the long term to not material. The chronic climate risk (e.g. rising sea level) will be perceptible in the longer term if no appropriate policy measures are taken. That is the hot house scenario.

The materiality of other environmental risks within the non-life insurance portfolio (Aras) is currently estimated as not material. We assume that this estimate will not change in the future or under different scenarios.

Life insurance portfolio

The materiality of transition and physical climate risks within the life insurance portfolio (Argenta Assuranties) is currently estimated as not material.

The scope is the life insurance activities (branch 21 and branch 23 products). Based on the terms of the life reinsurance contracts and the average age of the insured population with branch 21 and branch 23 products, the impact is estimated (expert-based) as not material.

We assume that this estimate will not change in the future or under different scenarios.

Health insurance portfolio

We assume that the analysis of the transition risk within the funding and liquidity policy of Argenta Spaarbank will evolve from material to not material in the (dis) orderly scenario. In the hot house scenario, the transition risk is by definition not material. The physical climate risks are also currently estimated as not material. We assume that this estimate will not change in the future or under different scenarios.

Wholesale activities

We assume that the analysis of the transition risk within the funding and liquidity policy of Argenta Spaarbank will evolve from material to not material in the (dis) orderly scenario. In the hot house scenario, the transition risk is by definition not material.

The physical climate risks are also currently estimated as not material. We assume that this estimate will not change in the future or under different scenarios.

Asset management activities

We expect the transition risk to evolve from material to not material in the (dis) orderly scenario. In the hot house scenario, the transition risk is by definition not material. This impact only manifests itself indirectly via the fee revenue received from the impacted assets under management. Moreover, these risks are covered by the SFDR classification of the funds (Article 8 or 9) and the exclusion policy, so they can be included from the transition risk perspective.

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Stress tests

Another source used to detect financial materiality is the scenario stress-testing process, which is carried out annually for the bank as well as the insurance company.

The stress tests did not take any mitigating actions into account. Focus was placed on potential losses – without management actions – to check whether sufficient capital buffers are available to bear the losses. The losses result from widening spreads, defaults, dips in property value, etc.

Argenta Spaarbank

A climate stress test was carried out for Argenta Spaarbank as part of ICAAP (Internal Capital Adequacy Assessment Process), inspired by the disorderly scenario set by the ECB and NGFS (Network for Greening the Financial System). In 2024, flood risk was also integrated.

Under the normative perspective (ICAAP Pillar 1), Argenta conducted a set of company-wide stress tests over a projection horizon of three years. We projected trends in capital ratios (starting from the situation as at 31 December 2023) according to the 2024 business plan. In terms of climate risk, a transition scenario as well as a physical climate risk scenario are calculated, with the transition scenario being based on the disorderly scenario in the short term from the ECB stress test in 2022. Within the investment portfolio, sectors with an increased transition risk were subject to widening spreads and rating downgrades. In addition, we assumed a counterparty with an increased risk of defaulting. We also assumed a slight drop in house prices for less energy-efficient homes. And we included a slight rise in interest rates.

In the physical climate risk scenario, focus is placed on simulating water stress. This triggers additional defaults, leading to an increase in credit losses.

For both scenarios, we concluded that Argenta's capital position is strong enough to withstand the impact of the scenarios. In each case, the capital ratios remain comfortably above the regulatory minimum and internal target ratios.

Argenta Assuranties

As part of our ORSA process (Own Risk & Solvency Assessment), we calculated two long-term climate scenarios with projections to 2050. Our assessment started from a basic scenario aligning with the BP25 assumptions up to 2029, after which we based our projections on cautious growth assumptions.

The two climate scenarios are the NGFS disorderly scenario (delayed scenario) and the NGFS hot house world scenario (current policies scenario). The first scenario focuses on the impact from transition risks, while the second focuses on physical risks.

- **Transition risk**
In terms of solvency, it is notable that impact under the disorderly scenario remains limited. In the 2030-2040 period, an impact is shown on account of the transition period, which affects the economy. But in a subsequent phase, the ratio recovers in this scenario.
- **Physical risk**
Under the hot house world scenario, the impact is limited until 2040, but in the subsequent years, there is a significant impact on solvency and profitability. That is primarily due to the higher cost of claims and high catastrophe risk from non-life insurance policies in combination with a partial drop in reinsurance cover.
- **Sensitivity: “water bomb” in Flanders**
In addition to the two stress scenarios, we also carried out a sensitivity analysis. This involved mapping the impact of a water bomb over Flanders. This analysis shows the sensitivity of a what-if simulation of the prolonged precipitation of July 2021 on the profitability and solvency of Aras. Our analysis took into consideration the intervention of reinsurance and the intervention of government (legal limit). We also demonstrated the impact if the government had not intervened (worst case -68 million P&L impact).



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Climate policy

Argenta uses its climate policy to manage the identified material risks and take advantage of the opportunities arising from climate change, both in terms of climate adaptation and climate mitigation.

Sustainability Charter

The Sustainability Charter sets out our general ESG aspirations and forms the basis for the sustainability policy and sustainability action plan. Our long-term

aspiration to be in line with the Paris climate agreement (climate mitigation) takes priority under the ‘environment’ pillar of the Charter.

Sustainability policy and action plan

The sustainability policy translates the aspirations from the Charter into a policy, targets and concrete actions to manage our material risks and opportunities, which are comprehensively set out in a sustainability action plan. The 2024-2027 action plan includes the actions and targets under the transition plans of our mortgage loan and investment activities (climate mitigation), as well as our actions within the scope of climate adaptation.

Climate risk policy

Climate and environment-related risks have to be managed within a suitable risk framework. It is important for us to have a good understanding of the risks and to take the right measures to control them. This is the only way for us to be armed against the consequences of climate change to the best possible effect.

In 2021, we drew up a climate action plan following the publication of the ECB climate and environmental risk guidelines. The action plan is based on the 13 expectations proposed by the regulator and monitored internally at regular intervals. The regulator also closely monitors the execution of the action plan and regularly evaluates its implementation.

We achieved a major milestone in the climate action plan when we integrated climate risk into the Financial Risks policy applicable to all entities of the Argenta Group. The policy translates the strategic objectives, and legislation and regulations on climate and sustainability risks into a policy concrete framework that controls the daily operation of Argenta’s business activities. The transition plans form part of this policy. The policy for the investment activities carried out via the bank and insurance company is likewise set out in the Financial Risks policy. The risk policy is further translated into standards setting appropriate risk limits on the level of the various business activities, for transition-related as well as physical climate risks.

Further information on our objectives and actions relating to the climate risk policy can be found [here](#).

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Green Bond Framework

In 2022, a Green Bond Framework (GBF) was elaborated to support our climate strategy and the transition to a climate-neutral society. In this way, Argenta also contributes to the growth in the green bond market and capitalises on the willingness of investors to finance sustainable properties.

The Green Bond Framework is set up as an overarching framework under which Argenta can issue green bonds. The framework takes into account the 2021 ICMA¹² Green Bond Principles. In connection with the European Green Bond Standard, Argenta will take further steps in 2025 to update the Green Bond Framework.

The capital flows generated by bonds issued under the Green Bond Framework are used to finance and/or refinance new or existing green loans in accordance with the eligibility criteria set by Argenta under the Green Bond Framework, as per the 2021 Green Bond Principles.

- Loans for private homes in Belgium or the Netherlands are eligible, provided that:
- EPC label ≥ “A” or belonging to the top 15% of the national or regional residential housing, expressed in operational “primary energy demand” (PED) and subject to satisfactory substantiation;
 - Energy performance lower than at least 10% of the local threshold for “nearly-zero energy building” (NZEB) requirements;
 - Renovated properties, in accordance with the requirements set for “complete renovations”;
 - Renovated properties, for which energy savings of at least 30% are made compared with the situation before the renovation.

The Green Bond Committee is composed of representatives from the Treasury department, the wholesale funding expert, the sustainability manager and representatives from the relevant business departments. The Green Bond Committee ensures that the GBF is updated in good time in accordance with the changes in corporate strategy or as a result of technological, market or regulatory developments.

The GBF is publicly available at www.argenta.eu.

Climate strategy

Through the strategic choices we make, we can minimise the negative consequences and risks of climate change and support our customers as they respond to the consequences of climate change. By gearing our business model to the transition towards a climate-neutral society, Argenta can take advantage of new opportunities.

Argenta’s aspiration is clear: we want to contribute to the goals of the Paris climate agreement to limit global warming to 1.5°C by 2050. We set reduction targets and take measures to systematically reduce emissions from our business activities (the financed emissions), with due regard for the social impact that the transition will entail for our customers. Using the insights gained from the materiality analysis of climate and sustainability risks, we identified reduction targets in 2024 for our mortgage loan activities in Belgium and the Netherlands, and the bank’s investment activities.



¹²International Capital Markets Association

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In addition, we are also mapping the operational footprint of our activities (Scopes 1, 2 and 3). These emissions are negligible in relation to the total share of our GHG emissions. We are not therefore setting any specific targets, but we are still taking measures to ensure that our impact remains as low as possible.

Achieving the targets of the Paris climate agreement and reducing Argenta’s financed emissions are greatly dependent on the policy and market context in which we operate. The policy decisions of governments will play a crucial role in the coming years. Changes in policy can have a critical impact on whether we achieve our long-term objectives. Argenta does not have any control over or means of impacting the general policy and market context. Argenta will closely monitor this context and will make adjustments to its climate strategy where necessary. If the objectives and actions we have defined are no longer feasible due to changes in the context, Argenta will consider this issue together with the Board of Directors. It will then be necessary to look at what adjustments can be made in the short, medium and/or long term. Argenta will ensure transparent communication on this matter.

Our climate strategy and the reduction targets we have set are based on the policy context of 2024. Given the unpredictability of the policy context over the next few years, our climate strategy must be interpreted as an obligation to use best endeavours and not as an obligation to produce results.

Argenta’s climate endeavours cannot be seen separately from the broad context of sustainability. For Argenta, the “E” of environmental is inherently bound up with the “S” of social and the “G” of governance. This means that we pay heed to the need for a transition towards a climate-neutral economy and for the social consequences that go along with this, such as social inclusion, affordability and accessibility. Supporting our customers while retaining all simplicity is an important key in this process. For more information on our approach with respect to simplicity, please see [here](#).

The following section goes into more detail about the transition plans, objectives and actions of mortgage loan activities in Belgium and the Netherlands and the bank’s investment portfolio. By focusing on a sustainable credit product range and investing responsibly, Argenta adjusts its strategy and business model so that it can support the transition.

In 2024, there was no significant operational expenditure or capital expenditure relating to our climate strategy, nor were any specific operational expenditure or capital expenditure targets set for the future.

In 2024, Argenta generated EUR 1.5 billion through issuing green bonds under the Green Bond Framework, for financing sustainable homes in Belgium and the Netherlands. Argenta therefore has recourse to these funds to support the transition plans of the mortgage loan activities.

On the activities that are eligible and aligned, Argenta reports in line with the EU Taxonomy regulation 2020/852 art.8. For these statements, we refer to [chapter 6.5 Taxonomy reporting](#).

Mortgage loan activities

We established transition paths to measure the financed emissions of our mortgage loan activities in Belgium and the Netherlands and to monitor our efforts.

A new task force calculated an initial baseline measurement of the financed emissions (Scope 1, 2 and 3 emissions of the counterparty, in tonnes of CO₂ equivalent) and determined the transition paths. As part of this analysis, focus was also placed on collating data and assessing data quality and data processes. As far as possible, we rely on internally available data which, where necessary, is then supplemented with data proxies (or data estimates). Among other processes, Argenta uses the PCAF methodology for this. In the short term, it is important that Argenta continues to focus on collating accurate information on the sustainability characteristics of properties, including after sustainable renovation works have been carried out. Further information on our limited scope calculations can be found [here](#).

The approach for determining the transition pathways for the mortgage portfolios in Belgium and the Netherlands is based on the CRREM (Carbon Risk Real Estate Monitor) methodology. The CRREM modelling takes account of SBTi (Science Based Targets Initiative) and provides insights into the emissions of buildings. Argenta uses the 1.5°C emission routes because they are in line with the Paris climate targets. Based on this methodology, we can determine a target process which we will then use as a benchmark for monitoring our efforts over the next few years.

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Working together with the responsible teams for Belgian and Dutch loan activities, we explored various scenarios for determining the efforts required to support reduction targets using a projection tool. Among other factors, we took into account the degree of sustainable renovation, the rate of renovations and the emission factors associated with energy consumption, in combination with production assumptions until 2050. We went on to translate that information into concrete strategic KPIs and actions. Focus was initially aimed at meeting our objectives by 2030, in accordance with the ultimate target process to 2050. The business teams can then determine targets and act as necessary, based on tangible, concrete and feasible data. It also means we can adequately respond to any uncertainties and make changes as necessary in the lead-up to 2050.

Belgium
Transition path

Argenta uses the Flemish Climate Plan as an important basis for its transition plans. The Flemish Climate Plan has a considerable impact on the local context and environment of our customers, and in turn helps determine the general market trends in sustainable renovation. In its model, Argenta assumes that the Flemish policy is also effectively adopted. Government intervention and the broader geopolitical and economic context present numerous areas of uncertainty, which can, in turn, have an important effect on the attainment of our reduction targets.

Achieving the target process depends on a number of key assumptions:

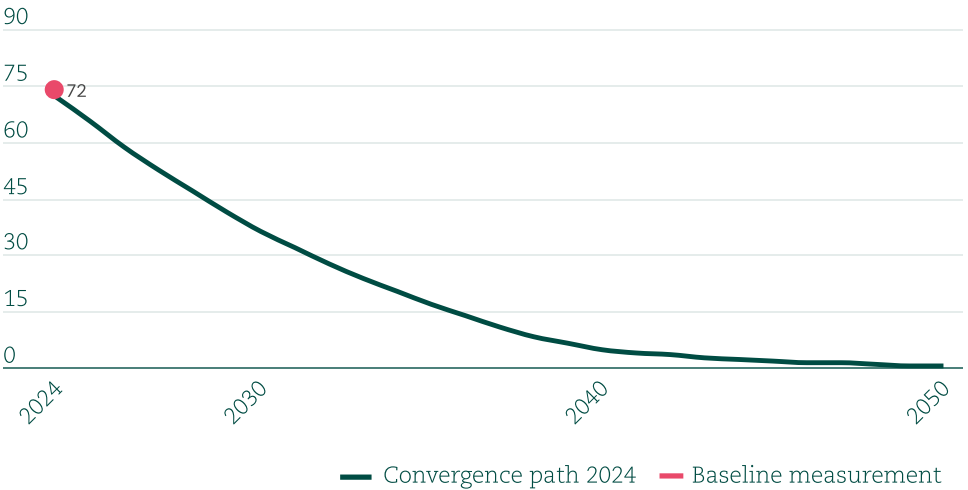
- We expect the government to impose a general obligation to renovate alongside the existing obligation to renovate when property is purchased (in Flanders). We expect the requisite EPC rating to become more stringent over time in both cases.
- We assume there will be a sharp increase in the degree of renovation that is unrelated to a legal obligation to renovate. This should also substantially improve the depth of renovation.
- We assume that power generation in Belgium will continue to become greener with a view to achieving net zero in 2050.
- We assume that Argenta will capture the requisite data to detect and measure improvements in its existing portfolio. Argenta strives to continue to improve data quality over the next few years and to reduce the use of proxies as far as possible.

The emission reduction targets of the transition path are further translated into strategic KPIs, based on the share of financed properties with an A and B EPC label.

Target attainment in the transition path is almost entirely driven by assumptions relating to current government policy which guides sustainable transition. The parameters over which Argenta can exert an influence play a more marginal role.

Benchmark: CCREM – 1,5°C

Evolution of emission intensity Belgium



In 2024, we carried out an initial baseline measurement of the financed emissions based on financial reporting relating to the portfolio of mortgage loans for new builds and renovation work in the residential real estate sector. Further information on the calculation of these emissions can be found [here](#).¹³

¹³Argenta bases its calculations as much as possible on primarily available data sources. A calculation based solely on PCAF parameters (proxy values) would lead to a lower emission intensity.

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Targets

Based on the outlined transition path, we set the following reduction targets:

	Metric	Base year 2024	Target 2030	Target 2040	Target 2050
Mortgages in BE	Physical intensity kgCO ₂ /m ²	72	36	5	0

Argenta aims to be a trusted partner in affordable, sustainable homes for everyone. We do that by providing our (future) customers with honest advice in straightforward language and supporting them in the process of obtaining a sustainable and affordable home. We provide this support not only via our branches but also digitally. In this way, we are building a sustainable and high quality loan portfolio and we are supporting the transition from non-sustainable to sustainable properties.

The strategy of ‘sustainable homes’ is based on the transition path for the mortgage portfolio in Belgium. We translated the reduction targets into the development of the EPC composition of the portfolio, paying special attention to customers who have properties that are not yet sustainable and who want to renovate them.

In compliance with the target process and in line with our climate strategy, Argenta sets itself a target of 50% for the share of financed properties having an A and B EPC label by 2030, 80% by 2040 and 95% by 2050. We support these targets by taking targeted action, such as offering price incentives for sustainable renovation projects and supporting our customers by giving them a simple overview of their renovation plans.

Actions

In the ‘sustainable homes’ strategy, we set various actions required to support the transition plan to 2050. The actions initially focus on attaining our targets by 2030, via which we want to support our customers in transitioning to sustainable properties.

Actions include the allocation of price incentives for non-energy-efficient homes, with the customer undertaking to renovate sustainably. We also support the customer by offering a renovation scan: this is a tool which helps the customer to obtain a simple overview of the works they need to carry out in order to achieve a good level of energy performance as well as the expected cost price of such works.

Repositioning of sustainability discount on mortgages

In 2024, Argenta opted to reposition its discount of 15 basis points for sustainable properties (including new builds) to a discount for complete renovation projects of non-sustainable properties (to the level of EPC A and B). In this way, we support customers in purchasing their home and help increase the affordability. Customers benefit from sustainable renovations: the value retention of their home is reinforced, living comfort is enhanced and energy consumption can go down. The home forms an important part of the customer’s assets and succession planning. We include this in investment discussions with customers and refer to it in our campaigns.

Simple overview thanks to the renovation scan

Branch managers help convey the importance of sustainable homes during their advisory discussions with customers. Using a tool developed by Rock.Estate, we provide customers with an overview of the current and future sustainability of their home, free of charge.

Within a matter of minutes, customers are able to see what renovation works are



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needed to make their home more energy-efficient and gain a better EPC rating. In this way, we help customers decide on their ecological renovation goals and the process to follow. The renovation scan gives an indication of the budget needed for the renovation works and the possible positive impact on the home's EPC value. For instance, with lower energy consumption, their energy bills will be lower, or the value of the home will be retained or even increased.

In 2024, we helped nearly 5,000 customers gain a simple overview of their sustainable home project.

Increasing awareness via targeted campaigns

We want to enhance Argenta’s visibility in the area of sustainable homes. In 2024, we launched the campaign: “Renovating sustainably? That’s money-smart!”. Under the Home proposition, we carry out actions, request the necessary budgets for them, and monitor the results achieved via the strategic roadmap. The above actions fall under the current budgets.

The Netherlands
Transition path

To be able to determine the reduction targets in line with the target process, we also look at how the EPC composition of the mortgage portfolio needs to evolve.

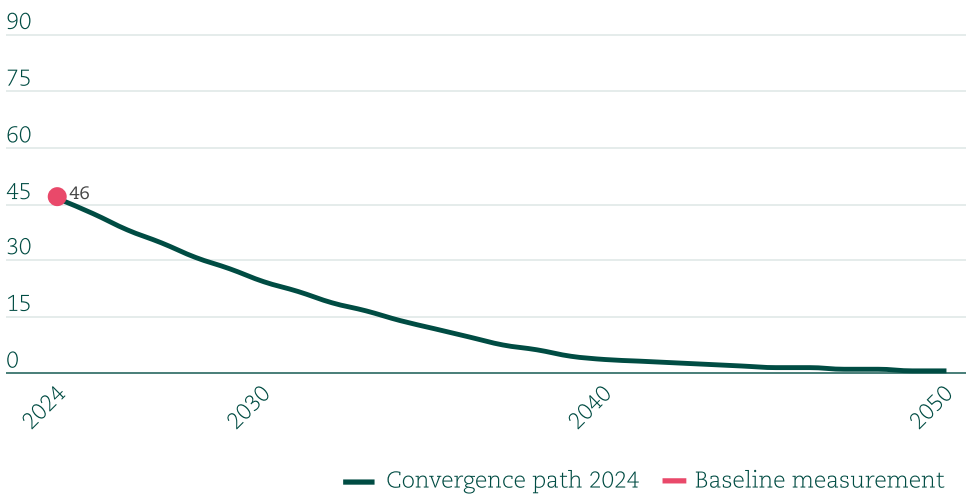
The mortgage portfolio of Argenta Nederland is composed of properties with relatively favourable EPC labels (A and B). The transition model is based on the general assumption that the Dutch government will incentivise the process of making homes more sustainable.

- The following assumptions play a key role in determining how emissions are expected to evolve:
- The Dutch legislator does not (yet) impose any obligation to renovate. However, thanks to an amendment to the Temporary Mortgage Credit Scheme (TRHK), customers can borrow more if their homes have a favourable energy label. What is more, customers purchasing a home with a less favourable energy label can borrow more if they start carrying out the requisite sustainable renovation works.
 - The central government incentivises the sustainable renovation of homes via the Warmtefondts (National Heat Fund). This Fund enables customers to take out a loan which, in some cases, may even be interest-free (depending on income).
 - Based on our insights into the application process, we expect approximately 15%

- of our customers to opt for sustainable renovation works.
- In 2025, we are launching new measures with the aim of ensuring that the inflow of homes with favourable energy labels and share of sustainable renovations into our portfolio continues to increase. In addition, we are optimising our current Argenta Green Loan product range (lending at a cheaper rate to encourage greater sustainability) in 2025.
 - Over the next few years, we will focus on the above measures and continue to optimise our customer approach so that we can also encourage our existing customers to renovate their homes sustainably.
 - In the coming years, Argenta Nederland will keep working on achieving a high level of data quality, in conjunction with our business partner, Calcasa. We carefully monitor developments in the area of data.
 - The following chart is based on production and portfolio growth at the end of 2023. Argenta Nederland’s focus over the next few years will be to gain a higher share of the Dutch market. We expect emissions to continue dropping as a result.

Benchmark: CCREM – 1,5°C

Evolution of emission intensity the Netherlands



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In 2024, we carried out an initial baseline measurement of the financed emissions in accordance with the CSRD reporting process and based on financial reporting relating to the portfolio of mortgage loans for new builds and renovation work in the residential real estate sector in the Netherlands. Further information on the calculation of these emissions can be found [here](#).¹⁴

Targets

Based on the outlined transition path, we set the following reduction targets:

	Metric	Base year 2024	Target 2030	Target 2040	Target 2050
Mortgages NL	Physical intensity kgCO ₂ /m ²	46	22	3	0

Argenta wants to support its Dutch customers to (be able to) live more sustainably. And we do that together with customers and our network of independent advisers.

The reduction targets of the transition path were further translated into strategic KPIs, based on the development of the EPC composition of the portfolio. In the Netherlands too, our focus is on customers who have properties that are not yet sustainable and who want to renovate them.

For the coming years, Argenta Nederland will continue to work on proactive and sustainable customer management. In line with the set reduction targets, we want to have 65% of A and B labels in our portfolio by 2030. And by 2040 and 2050, we are aiming for 75% and 95% respectively.

To support us in the process of meeting these targets, we offer a suitable product range, making sure that our language and information are simple and clear. A sustainable home ensures greater living comfort, while making it more affordable to live in this way.

Actions

Just as in Belgium, we want to assume our responsibility to make sustainable homes more affordable in the Netherlands too. That is why we support our customers in a number of different ways, in addition to the options already available under the TRHK:

- If customers do not yet know how exactly they are going to make their homes

more sustainable, they can make use of the Argenta energy-saving budget option when taking out their mortgage.

- We introduced Argenta Green Loans early in 2024. Customers can borrow a maximum of EUR 35,000 at an attractive rate for carrying out sustainable renovations in their home. In 2025, this offer was further supplemented with longer terms and interest-free periods.
- From 2025 onwards, we are offering customers the option of borrowing an additional 6% (maximum) in addition to 100% of the market value. That money then has to be used to sustainably renovate the home.
- In 2025, we are also introducing the Argenta sustainability discount. Customers with a home that has a better label can benefit from a lower interest rate. We have introduced this discount to attract new inflow and to encourage customers to renovate their homes sustainably.
- In 2025, we will simplify and digitalise the customer process for making homes more sustainable.

Under the Homes proposition in the Netherlands, we carry out actions, request the necessary budgets for them, and monitor the results achieved via the strategic roadmap. The above actions fall under the current budgets.



¹⁴Argenta bases its calculations as much as possible on primarily available data sources. A calculation based solely on PCAF parameters (proxy values) would lead to a lower emission intensity.

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Issuing green bonds under the Green Bond Framework

By issuing green bonds under the GBF, Argenta intends to boost the financing of sustainable properties in Belgium and the Netherlands. In 2024, Argenta generated EUR 1.5 billion through issuing bonds under the Green Bond Framework. Since the Green Bond Framework was set up, Argenta has generated a total of EUR 2.6 billion.

Investing activities

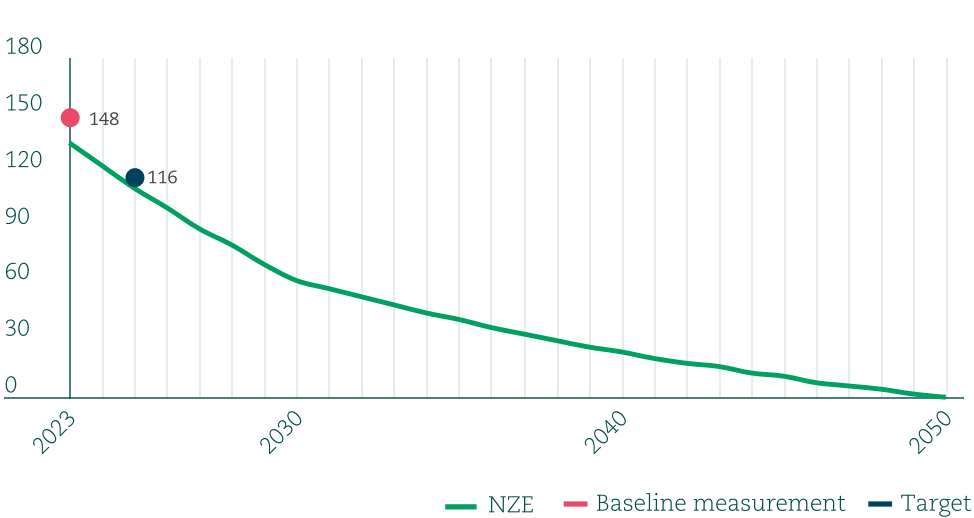
Transition plan

In 2024, we carried out an initial baseline measurement to map the financed emissions of the bank’s investment activities. This involves looking at the total CO2 emissions generated by counterparties (companies) who Argenta finances, as a function of our investment compared to the total value of the company in which we are investing.

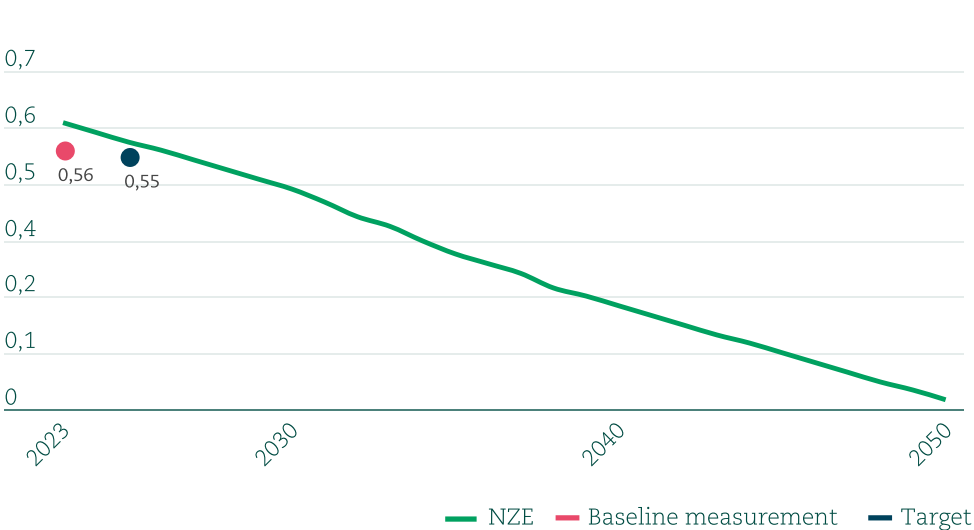
In 2024, Argenta engaged an external data provider, ESG Moody’s, to collate the counterparties’ emission data (Scopes 1, 2 and 3). Data coverage is a focus area on which we must continue working in the coming years. For any missing data, we use PCAF as an approximation. The PCAF standard provides for metrics to calculate the financed emissions for various asset classes, including shares and bonds.

In 2024, Argenta set short-term reduction targets for the carbon-intensive sectors in which Argenta holds limited positions¹⁵ and for which physical intensity metrics are available. In concrete terms, this concerns the following sectors: ‘manufacture of cement’ (NACE CE23.51), ‘manufacture of motor vehicles’ (NACE C29.1) and ‘production of electricity’ (NACE D35.11). The reduction targets are aligned with the NZE 2050 scenario. This is a normative scenario setting out a path for the global energy sector to achieve net zero CO2 emissions by 2050. The scenario complies with key energy-related sustainability goals (SDGs or sustainable development goals), consistent with reducing global warming to 1.5°C and in line with emissions reductions scientifically assessed by the IPCC.¹⁶

Automotive sector (gCO₂/vkm)



Cement (tCO₂/t)



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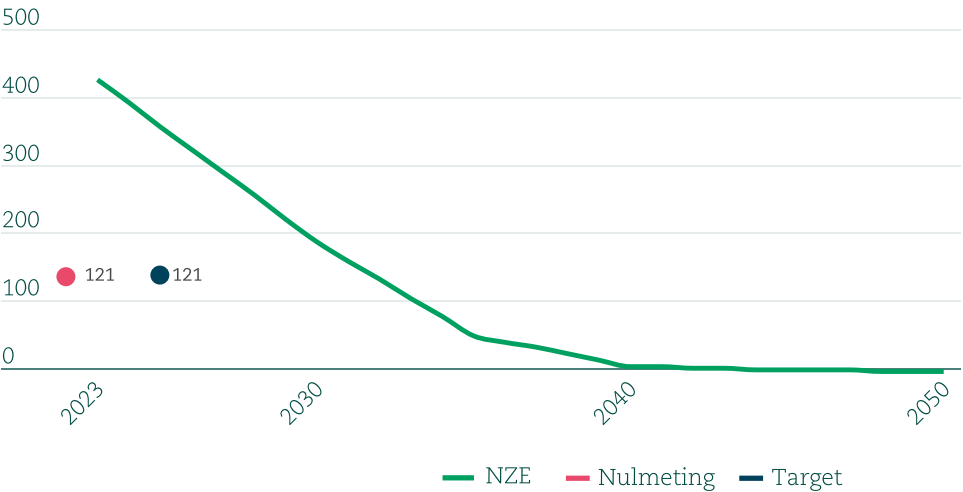
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¹⁵These positions represent 6% of the total amount invested in corporate bonds in the Aspa portfolio as at 31 December 2024. It specifically involves 6 companies.

¹⁶<https://www.iea.org/reports/global-energy-and-climate-model/net-zero-emissions-by-2050-scenario-nze>



Electricity (gCO₂/kWh)



Reduction targets in investment activities¹⁷

	Metric	Baseline value 31/12/2024	Status 31/12/2024	Target year	Target value
Energy sector ¹⁸	Intensity gCO ₂ /kWh	121	116	2025	121
Automotive sector ¹⁹	Intensity gCO ₂ /km	148	148	2025	116
Cement sector ²⁰	Intensity tCO ₂ /t	0.56	0.56	2026	0.55

For the energy sector and automotive sector, 2022 was selected as the reference year to determine the reference targets (+3 years). For the cement sector, the reference year is 2023. The baseline measurement calculations in 2024 were based on the most recently available emission data from the underlying counterparties. This means that there may be a gap.

Please note that since the calculations as of 31/12/2023, no recent data has been made available by the underlying companies regarding their emissions data. In 2024, a position was purchased with exposure to the energy sector, resulting in a change in the intensity figure. Information on the calculation of emissions can be found [here](#).

Over the course of 2025, Argenta will continue working on a transition plan for the other sectors. It is important to note here that Argenta already adopts a strict exclusion policy according to which companies operating in the extraction of fossil fuels are excluded. Over the next few years, Argenta will continue investing in sectors which are strongly positioned in the transition to a green economy, such as best-in-class utilities, companies operating in the waste and water sector, etc. Argenta has flexibility to cut positions at an early stage and redirect them to other sectors and/or counterparties if specific sectors or counterparties within the investment portfolio are making inadequate progress in transitioning to a green economy (cf. mitigating the risk of stranded assets).

Targets

Argenta opts to responsibly utilise the cash flows managed for our customers. That means that we endeavour to reduce our negative impact to the greatest extent possible and we focus specifically on positive impact.

Maintaining the exclusion policy

We intend to reduce our negative impact in the area of environmental aspects, social aspects and governance aspects as far as possible via the investment exclusion policy. The exclusion policy is based on international initiatives and standards such as the UN Global Compact Principles. Argenta excludes controversial sectors and activities, and companies that are criticised for ESG-related controversies (e.g. violations of human rights, employment rights, unethical business practices, etc.). For some years now, we have been applying a policy of not investing in companies that extract coal, oil and gas as their main activity. The investment exclusion policy is applicable in all entities within the Argenta Group. The entities managing the investment funds for our customers likewise enforce this policy.

At the end of 2023, we updated the exclusion policy to standardise certain operational points from which entities within Argenta could deviate, so the existing framework can now be uniformly interpreted and the policy forms a common basis for all Argenta entities. As part of the updating process, we worked out an energy transition framework based on the principle that businesses that are necessary for and/or focus strongly on the energy transition are no longer de facto excluded and can therefore be part of the investable universe. And can do so within a clearly defined, transitory and transparent framework.

¹⁷Argenta uses the transitional provision due to a high degree of data uncertainty. As a result, Argenta only reports intensity metrics.
¹⁸Only scope 1 emissions were included in the calculations.
¹⁹Only scope 3 emissions were included in the calculations.
²⁰Only scope 1 emissions were included in the calculations.

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Investing in green bonds

We want to make a positive impact by focusing on environmental and social characteristics. We invest in the fast-growing sustainable bonds market. In doing so, we strive to invest 10% of the total portfolio of debt instruments in a green, social or sustainable investment framework. For example, by investing in green bonds we finance projects that are aimed at energy efficiency, pollution prevention, ecosystems, clean transport, clean water and sustainable water management.

We make our voice heard in the companies we invest in via proxy-voting, enabling us to make an impact on decisions about environmental and social topics and governance.

As a locally anchored family bank and insurance company, we also consider it important to make a social impact within our immediate environment. We therefore invest, figuratively speaking, in our customers’ backyard. We do that by investing in loans to and bonds issued by local government institutions, such

as cities and municipalities, or in local infrastructure projects. In this way, we breathe financial life into projects which focus on public welfare, social housing, water treatment, care for the elderly, student housing, facilities for people with disabilities, green energy projects and more.

Actions

We implement various actions to meet our targets:

- We conduct investment analyses at the level of the individual counterparties to map the ESG impact of our investments. We do that on the basis of ESG information and scores from an external ESG data provider.
- Every six months, we draw up exclusion lists and monitor them in line with the investment exclusion policy.
- Via a proxy-voting partner, we voted in 2024 for a total of 29 companies at 38 general meetings for Aras and a total of 6 companies at 10 general meetings for Aspa.
- In 2024, we invested EUR 240 million in sustainable bonds at Aspa. The total portfolio of sustainable bonds at Aspa now represents 12% of the total investment portfolio. In the same period, we invested EUR 46 million in sustainable bonds at Aras. The total portfolio of sustainable bonds at Aras now represents 12% of the total portfolio.
- In 2024, at Aspa, we invested EUR 90 million in local projects, such as social housing and a sludge processing plant. Argenta has already invested more than EUR 1 billion in the local economy through the bank’s and insurance company’s investment portfolios. These investments breathe financial life into projects in public welfare, social housing, water treatment, care for the elderly, student housing, facilities for people with disabilities, green energy projects and more.

The Treasury & Investment Management department is responsible for implementing the actions in accordance with the Financial Risk policy and related standards.

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Climate risk policy

Targets

The consequences of climate change and the transition to a sustainable, low-carbon economy can have a significant impact on the economy and financial system which Argenta forms part of. Argenta therefore identifies ‘climate and sustainability risk’ as a financial risk:

“Likelihood of impact as a direct or indirect consequence of events or circumstances in the area of climate and environment (E), society (S) or governance (G) that may have a negative effect on the financial performance (e.g. value, liquidity) of assets and liabilities.”

For more information on the risk policy on sustainability, see [here](#).

Within the scope of the RAF, a risk profile is prepared based on specific risk indicators, and risk indicators (metrics) are determined.

Climate and environment

For transition-related risks, we opted for metrics such as:

- Average EPC rating of the mortgage portfolios in Belgium and the Netherlands (transition risk, limit key figure)
- Average EPC rating of mortgage production in Belgium and the Netherlands (transition risk, flashing light)
- Carbon transition score for the bank’s and insurance company’s investment portfolios (transition risk, limit key figure)
- E-score (environmental score) for the bank’s and insurance company’s investment portfolios (transition risk, flashing light)

We measure physical climate risks using:

- Flood risk in mortgage portfolios in Belgium and the Netherlands (physical risk, flashing light)
- Flood risk in non-life insurance portfolio for Belgium (physical risk, flashing light)

Limit values are specified to distinguish between the various zones in which a metric may be found: from dark green to red. The colour or zone in which the metric is found also determines the action that might have to be taken by the relevant business departments. Once a year, we review the metrics as well as their risk zones and limit values.

A self-imposed RAF value is also determined for the most relevant metrics. We also define a target process to be achieved over a period of 5 years in line with Argenta’s strategy and business plan.

Voluntaristic RAF	2024	2025	2026	2027	2028	2029
Average EPC value of mortgages in Belgium (Aspa)	315	296	279	260	242	223
Average EPC value of mortgages in the Netherlands (Aspa, Aras)	221	212	203	194	186	177
Carbon-transition score of the investment portfolio (Aspa, Aras)	2,1	2	2	2	2	2

Actions

The relevant business is required to identify targeted actions according to the risk zone, as specified above, with Argenta’s aim being for all risk metrics to be located in the light green zone.

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Energy consumption and mix

Over the last few years, Argenta has taken action to reduce emissions and energy consumption and to become greener. We extensively converted and renovated our head office to turn it into a sustainable and energy-efficient office building. As part of this process, we resolutely opted for sustainable technologies – solar panels, climate ceilings and geothermal resources.

Argenta generates its own energy and also purchases energy. In our energy contract, we use 100% green electricity for the head office in Belgium. Its consumption emissions are therefore completely carbon-free.

Argenta also generates its own electricity for the head office in Belgium via geothermal resources and solar panels. Argenta’s energy mix also includes natural gas, electricity from renewable sources and fossil fuels.

To calculate gas consumption in Luxembourg, an extrapolation was made from the gas consumption of our head office in Belgium. This figure is therefore an overestimation.



An overview is provided below of the energy mix per country²¹:

Description of energy expressed in MWh	Belgium	The Netherlands	Luxembourg
Total energy consumption for own activities	3,160.47	108.99	12.27
Total energy consumption from fossil sources	445.94	108.99	5.52
Total energy consumption from nuclear sources	-	-	-
Percentage of energy consumption from nuclear sources in the total energy consumption	-	-	-
Total energy consumption from renewable sources	2,714.53	-	6.75
Fuel consumption from renewable sources	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	2,409.44	-	6.75
Consumption of self-generated energy which is not a fuel	305.09	-	-
Percentage of renewable sources in the total energy consumption	85.89%	-	55.01%
Percentage of fossil sources in the total energy consumption	14.11%	100%	44.9%
Production of non-renewable energy	-	-	-
Production of renewable energy	-	-	-

²¹Argenta does not use any energy from nuclear sources and does not provide for the production of energy.



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Total greenhouse gas emissions

Overview of Scope 1,2 and 3 emissions

The inventory of emissions is drawn up on the basis of CSRD reporting requirements under E1-6 and in accordance with the GHG protocol²².

Argenta measures the environmental footprint (Scopes 1, 2 and 3) of the activities of its head office in Belgium and the offices in the Netherlands and Luxembourg over which it has operational control. A distinction is made in these measurements between direct and indirect greenhouse gas emissions. To calculate the emissions of its own activities, Argenta uses a tool developed in-house.

In 2024, we are also reporting on the financed emissions of the mortgage loan activities in Belgium and the Netherlands and the investment activities of the Bank Pool and Insurance Pool, which are likewise within the limits of our operational control and financial consolidation scope.²³ The reporting is based on Argenta's financial reporting. The PCAF methodology was used to calculate the financed emissions.

The main estimates and assumptions relate to the reporting of greenhouse gas emissions under Scope 3, which are subject to a high degree of measuring uncertainty due restrictions in methodologies and data, including dependence on external data providers. The following section goes into more detail in this respect.

As methods, data and emission factors evolve, our data sources and figures can become obsolete and updated methodologies and assumptions can lead to different conclusions. Argenta closely monitors the relevant developments and makes adjustments where necessary.

Total Scope 1, 2 and 3 emissions

In 2024, greenhouse gas emissions amounted to a total of 4,670,328 tCO₂e (market-based), 99% of which relate to the core activities and less than 1% to own activities.

	Retrospective	% of total greenhouse gas emissions
	Base year 2024	
Scope 1 emissions		
Gross Scope 1 emissions (tCO ₂ eq)	1,696.23	0.04%
Scope 2 emissions		
Gross location-based Scope 2 emissions (tCO ₂ eq)	446.51	0.01%
Gross market-based Scope 2 emissions (tCO ₂ eq)	34.96	0.00%
Significant Scope 3 emissions		
Total gross indirect (Scope 3) emissions (tCO ₂ eq)	4,668,595.68	99.96%
1 Purchased goods and services	93.50	0.00%
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	365.60	0.01%
5 Waste generated in operations	1.56	0.00%
6 Business travelling	12.29	0.00%
7 Employee commuting	1,074.41	0.02%
15 Investments	4,667,048.32	99.93%
Mortgages in Belgium	575,098.84	12.31%
Mortgages in the Netherlands	401,094.48	8.59%
Investment portfolios of the bank and insurance company	3,690,855.00	79.03%
Total greenhouse gas emissions		
Total greenhouse gas emissions (location-based) (tCO ₂ eq)	4,670,738.42	100.0%
Total greenhouse gas emissions (market-based) (tCO ₂ eq)	4,670,326.88	100.0%

²²Project financing' was not included as an asset category in the scope of the calculations because the public-private projects (PPP) in which Argenta invests through its public banking activities are considered to be loans. The category 'motor vehicles' was also not included due to the limited exposure on Argenta's balance sheet and the lack of significant data.

²³Please note that the financed emissions of the participations in Epico, Jofico and Van Ameyde are not included in the calculations.

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Greenhouse gas intensity based on net revenue	2024
Total greenhouse gas emissions (location-based) (tCO ₂ eq) based on net revenue	0.005
Total greenhouse gas emissions (market-based) (tCO ₂ eq) based on net revenue	0.005

Net revenue used to calculate greenhouse gas intensity	EUR 918,049,933
Net revenue (other)	-
Total net revenue (in financial statements)	EUR 918,049,933



Operational activities in Belgium, the Netherlands and Luxembourg

The greenhouse gas emissions from own activities in 2024 amounted to 3,280 tonnes CO₂ (market-based method). That total includes emissions from Scopes 1, 2 and 3. The largest share is attributable to indirect Scope 3 emissions.

- Emission factors were applied to calculate the emissions from operational activities. This involved using the following sources:
- UK Department for Environment, Food & Rural Affairs (DEFRA)
 - International Energy Agency (IEA)
 - CoM national emission factors
 - CO₂ emission factor data (an initiative for the calculation of greenhouse gases in the Netherlands, supported by the national government)
 - The Global Warming Potential (GWP) ratios are based on the Intergovernmental Panel on Climate Change (IPCC), see the Fourth Assessment Report (AR4).

Where possible, the calculations are based on primary data sources. Where no data is available, proxies and/or assumptions were used. The figures for the office in Luxembourg are based on an extrapolation of the figures in Belgium, apart from electricity consumption.

Scope 1 emissions

The Scope 1 emissions comprise Argenta’s direct emissions. These include: fuel combustion for heating (natural gas), fuel consumed by commercial vehicles and cooling gases for freezing and refrigeration.

The Scope 1 calculation is based on primary data sources provided by suppliers.

Scope 2 emissions

The Scope 2 emissions comprise Argenta’s indirect emissions. More specifically, they cover the purchased electricity, including the electricity consumption of company cars. For the location-based emissions, the national emission factors for electricity consumption in Belgium, the Netherlands and Luxembourg are taken into account. For the market-based calculations, the share of green electricity is taken into account.

In 2024, Argenta in Belgium entered into a new energy contract with the energy provider for 100% green power for the 2024-2026 period.

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The head office in Belgium runs a monitoring system for CO2, temperature and humidity in the office buildings. This information is reported monthly to the Committee for Prevention and Protection at Work. By correctly managing the indoor climate and maintaining an overview of this data, we can contribute to reducing our environmental footprint.

The Scope 2 calculation is based on primary data sources provided by suppliers²⁴.

Scope 3 emissions

The Scope 3 emissions comprise the greenhouse gas emissions from own activities and the upstream and downstream value chain.

Five categories were included for the 2024 calculations.²⁵ They were selected on the basis of data availability to ensure a higher degree of certainty for the calculations we perform.

In concrete terms, the categories are:

- Category 1 – purchased goods and services: paper and cardboard, water consumption and food.
- Category 3 – fuel- and energy-related activities (not included in Scope 1 or Scope 2).
- Category 5 – Waste: waste from paper and cardboard and municipal waste.
- Category 6 – business travelling: primary data is available for business trips in Belgium. For the Netherlands, an extrapolation was carried out based on the figures for Belgium.
- Category 7 – employee commuting: reporting on emissions from commuting. We based our calculations on an internal survey issued in 2024 to in-house employees, asking them for the main means of transport they use to commute to and from work.

The calculations under these categories are based on primary data sources provided by suppliers. The employee commuting calculation is based on primary data sources from Argenta itself.

Actions relating to operational activities
2024

In 2024, we performed various actions focusing on our operational footprint. We entered into a new energy contract for the head office in Belgium, under which we purchase 100% green power for the 2024-2026 period. Emissions for electricity consumption in Belgium are carbon-free.

In 2024, we continued to work on collating internal data so that the reporting process on emissions can run more smoothly. We entered into dialogue with suppliers about collating data, to coordinate our needs.

We do not set any targets for reducing emissions within our operational boundaries. We have resolutely opted to continue focusing on our sustainable principles:

- We continue to focus on sustainable mobility. Under our mobility budget, employees can purchase a bicycle (an ordinary bike, folding bike, racing bike, mountain bike, cargo bike or electric bike). They can also make use of all kinds of sustainable means of transport (public transport, shared solutions, etc.) that are offered via the Olympus mobility app. Employees who live close to their work or spend a minimum of 60% of their work hours at home can also finance their rent or mortgage capital repayments or interest with the mobility budget.
- We also continue to focus on renewable energy at the head office and purchasing 100% green power.

2025

In 2025, we will carry on with our efforts to collate data and improve data quality. We will determine the actions required to further map the categories under Scope 3, which are not yet included. In addition, increasing importance will be given to cooperation with suppliers within the scope of collating data.

In 2025, Argenta will continue work on outlining an environmental policy in which we further build on our objectives, our sustainable principles and the transition to a climate-neutral society.

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²⁴Luxembourg's electricity consumption is based on the figures for 2023.
²⁶The other scope 3 categories were found to be immaterial based on an internal analysis and are therefore not included in the calculations.



Financed emissions

Scope 3 business activities:

To calculate the financed emissions, we use the data from our financial reporting as a basis. The GHG protocol forms the foundation of our calculated assets. These are extended to include the most material assets aligned with the lending and investment activities of the bank and insurance company.

The lending activities in Belgium and the Netherlands represent over 20% of total emissions in 2024. The investment activities of the bank and insurer represent 79% of total emissions.

Financed emissions therefore take top priority for systematically reducing emissions by 2050. For further information on our transition plans, targets and actions to systematically reduce financed emissions by 2050, see [climate strategy](#).

The following table provides more detailed information on the applied methodologies and data limitations.

Asset class	Methodology	Data limitations
Mortgages	<p>Financed emissions are calculated using the PCAF methodology, in absolute terms in tCO₂eq and in relative terms as intensity in kgCO₂eq/m².</p> <p>The applied emission factors are based on the published energy balances of the Belgian and Netherlands governments.</p> <p>Argenta applies a waterfall model for the calculations, with the aim of achieving the highest possible level of data quality. The calculations are primarily based on official EPC ratings and current data on living area. If the official EPC rating or current data on living area is not available, we use a proxy based on the PCAF.</p> <p>If neither of these is available, we use the PCAF proxy.</p> <p>Scopes 1 and 2 are included in the calculation.</p>	<p>The emissions are calculated for mortgage portfolios in Belgium and the Netherlands – these make up the majority of the lending activities. Together, the portfolios represent EUR 40 billion and correspond to 94% of the total lending portfolio. Insufficient data is available to report on the entirety of the activities.</p>

Listed & unlisted equity, corporate bonds and business loans	<p>Financed emissions are calculated using the PCAF methodology in absolute and relative emissions based on the investment portfolios of ASPA and ARAS as at 31 December 2024.</p> <p>To collate the emission data, Argenta uses current data on its counterparties, provided by the external data provider, Moody's. If this data is not available via the Moody's platform, Argenta searches for current data in the annual reports or sustainability reports (manual searches). If no current data is available, we use the PCAF economic activity-based proxy, based on the sector and region of the issuer.</p> <p>Scopes 1, 2 and 3 are included in the calculations.</p>	<p>Investments for which Argenta itself has the decision-making power are included in the calculations. The own investments of customers via Argenta Asset Management, investments from branch 23 insurance funds and investments of Arvestar are not included in the calculations. 86% of the investment portfolio is included in the calculations. There is inadequate data or insufficiently accepted methodologies are available to report on the complete portfolio.</p>
Government bonds	<p>Financed emissions are calculated using the PCAF methodology in absolute emissions based on the investment portfolios of ASPA and ARAS as at 31 December 2024</p> <p>To obtain the emission data, Argenta uses the PCAF European building emission factor database. For Scope 1 emissions, factors are available in this database, obtained directly from the UNFCCC. For Scope 2 and Scope 3 emissions, proxy values are available in the PCAF database.</p> <p>Scopes 1, 2 and 3 are included in the calculations.</p>	<p>For Scopes 2 and 3, we use 2018 data published by the PCAF.</p>

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Data quality
The composition of Argenta’s emissions is subject to uncertainties in terms of data quality and methodologies. Argenta closely follows developments in the field of calculation principles and their quality, and aligns its procedures with the latest methods.

Argenta has analysed the data quality of its calculations based on the PCAF data quality score. Score 1 stands for high data quality, while score 5 estimates mean that they are calculated on the basis of statistical data.

Data quality of PCAF score	2024
Sovereign debt	4
Shares, bonds and business loans – current data	2
Shares, bonds and business loans – estimate based on activity and location	4
Mortgage portfolio in Belgium	4.9
Mortgage portfolio in the Netherlands	3.3

The good data quality in the Netherlands is linked to our external data provider, who has access to further data via the Dutch government.

Social

Proximity to our customers

Argenta is active in Belgium and the Netherlands. We want to use our product range to help families and business with all aspects of their financial management: banking, savings, insurance, borrowing and investment. To enable us to do this, we have created four propositions in Belgium: Family & Protection, Home, Wealth and Business. Our propositions in the Netherlands are Savings and Home. More information on our propositions can be found [here](#).

Material impact, risks and opportunities

Argenta wants to respond to the ever growing need for simplicity and proximity in a complex and unpredictable world. More and more people are looking for a bank that is there for them, communicating simply, in an inclusive way, with transparent advice geared to their individual needs.

Argenta has access to and manages a huge amount of confidential information on its customers. We have the responsibility to treat our customers’ data with care and offer them secure digital channels.

We also assume this responsibility in how we communicate with customers and the channels we use for this. Argenta is there for all its customers and takes specific risks associated with more vulnerable groups into consideration.

Positive impact

Argenta can make a positive impact on customer satisfaction by providing quality services with a good level of service and a suitable range of products. We can also make a positive impact by ensuring responsible marketing practices: meeting customer needs with a focus on integrity and transparency.

Negative impact

If insufficient consideration is given to our digital channels, there is a risk of excluding certain groups, for example if the financial or digital literacy of our customers is not taken into account.

Risks

Argenta manages data on its customers, which can entail risks. There is a cyber

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security risk of hacking or other attacks on IT systems making them unavailable or creating a security breach. There is a risk of data privacy if confidential customer data is leaked, for example as a result of a cyber attack. There is likewise a risk of confidentiality being compromised if customer data is not handled appropriately within Argenta.

Argenta strives to be a socially inclusive banker and insurer, but has also identified a risk in this respect. If services and product ranges are geared to small groups of customers, that could entail a financial loss.

Opportunities

Higher customer satisfaction can contribute to greater customer retention and loyalty. So we enter into long-term relationships with our customers.

Responsible marketing practices, including honest communication and transparency, contribute to a positive image. We also project our corporate values by focusing on the social inclusion of customers, simplicity and proximity. Stakeholders having a positive perception of our organisation presents an opportunity for Argenta.

The impact, risks and opportunities linked to our customers are important for our business model and strategy. Within its business model, Argenta mainly serves private customers and small businesses. We can make a positive impact on all our customers via the services we provide.

Customer relevance is one of the four pillars of the strategy. We base ourselves on our customer needs, offering them the right know-how and solutions whenever they need it. We do that by focusing on quality services and responsible marketing practices. Customer satisfaction is a major metric in this respect. The work involved in mitigating risks such as cyber security is strongly linked to the pillar of ‘professionalism’. We put customers first and build on the resilience of our strategy. Under the ‘simplicity’ pillar, we take the financial and digital literacy of our customers into consideration and pay heed to reducing negative impact.

Policies related to our consumers and end-users

We assume our responsibility vis-à-vis our customers via the policy we pursue. The following policies respond to the material impact, risks and opportunities with

respect to customers. The policies and charters are drawn up in accordance with the Universal Declaration of Human Rights, the UN Guiding Principles and the ILO Declaration on Fundamental Principles and Rights at Work. The anti-discrimination policy refers specifically to these rights and principles, while the other policies and charters incorporate them in their underlying basis.

The policies are applicable to the entire Argenta Group.

Product Approval and Review Policy (PARP)

The aim of the PARP policy is to (re)assess at regular intervals whether our products and services meet the needs of our customers:

- We put maximum effort into customer experience across all channels and make sure we attract the right customers with our products.
- We guarantee that all products and services are in line with the applicable legislation and regulations and offer sufficient added value.
- We develop our products and services cost-efficiently and produce them profitably.
- We open up the right distribution channels in accordance with customer needs, so that no groups are excluded.
- We remain sufficiently innovative so that we can keep serving market and customer requirements.
- We identify and control the relevant financial and non-financial risks.
- We ensure that our processes, applications and systems are modified so that products and services can be correctly and promptly processed and accounted for.

Statutory provisions linked to consumer production and responsible marketing practices also form part of the basis underlying the policy document. Integrity and transparency are of the essence.

In its capacity as gatekeeper, Compliance monitors the (non-)discriminatory nature of the range of products and services.

The PARP relates to all banking and insurance products and services offered to end customers in Belgium by Argenta Spaarbank (Aspa) and/or Argenta Assuranties (Aras).

The Executive Committee is responsible for supervising the daily activities of Argenta, including its development of new products and services.

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Integrity Charter

The Integrity Charter also forms the official basis for Argenta’s banking and insurance policy and serves as a guideline for actions and decision-making in Argenta. The Charter describes the principles involved in consumer protection and market abuse. Argenta considers its own interests and those of its customers to be one and the same. Focus is always placed on the customers’ interests. Furthermore, Argenta does not tolerate any abuse of the market by abuse of insider information or market manipulation.

More information on the Integrity Charter can be found [here](#).

Anti-discrimination

The anti-discrimination policy is also used to convey part of our sustainability vision. The policy sets out Argenta’s ambitions and objectives in the area of combating discrimination, via which we defend the interests of our customers, employees and branches.

Among other aspects, the anti-discrimination policy monitors the inclusion of vulnerable groups in the customer base. Argenta will put in place all reasonable resources to expand and improve its online services, taking into account what is legally and technically possible, among other factors. In doing so, Argenta will endeavour to gear services to people with physical disabilities. When implementing suitable measures based on the needs of relevant people, the size of the target group is taken into account to reduce the risk of a disproportionate burden.

Further information on the anti-discrimination policy is provided [here](#).



Duties of care

This policy sets out the foundations and principles governing duties of care for all activities of the Argenta Group. It includes the legally prescribed practices relating to duties of care and rules of conduct between Argenta as a financial service-provider and customers:

- Setting up an internal organisation to ensure that customer interests lie at the heart of Argenta’s processes;
- Providing customers with correct and adequate information;
- Preparing a profile of the customer’s personal situation (under the Know Your Customer principle);
- Advising and alerting customers;
- Carrying out or turning down customer requests.



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Based on these principles, we are anticipating the positive impact we can make on the customer: meeting their needs and giving them pride of place. They also present opportunities, especially in terms of increasing customer satisfaction.

The Executive Committee is responsible for implementing the policy and the Compliance director is the policy owner.

Privacy

This policy translates the General Data Protection Regulation (GDPR) and other international and national regulations into Argenta’s internal framework based on 12 principles. Argenta is thus able to demonstrate at any time that provisions under the regulations are complied with.

The policy provides Argenta with the means of responding to risks associated with data privacy and data security. Argenta processes personal data in accordance with the customer’s expectations and in compliance with the corresponding applicable regulations. Argenta wants to retain its customers’ trust at all times.

We regularly conduct DPIAs (Data Protection Impact Assessments) so that we can proactively respond to potential privacy problems and take measures to minimise any impact on our customers.

In addition, we carry out annual privacy maturity assessments to evaluate the privacy policy and identify areas of improvement. These assessments help us refine our privacy strategies and adapt them in response to new challenges and opportunities. We set realistic goals and plans based on these maturity assessments, with a view to improving our privacy practices, including investments in technology, training and process improvements.

The first line is responsible for implementing the privacy policy, and a DPO (Data Protection Officer) is appointed for Belgium and the Netherlands.

Information security and cyber risk management

The Group-wide information security & cyber risk management policy describes the guiding principles for establishing ‘Information Security & Cyber Risk Management’ capability. The described principles are implemented via procedures, standards, codes of conduct and service level agreements.

The aim of the Information Security Governance Council is to reinforce the information security policy throughout the organisation, support its implementation and oversee that related risks are identified and monitored by the relevant owner. It monitors the implementation of the information security policy and prepares the way for a company-wide approach and solutions.

Engaging with consumers and end-users about impacts

Customer relevance forms one of Argenta’s strategic pillars. Our services are always designed and implemented with customer needs in mind. To understand the impact we have on our customers, we engage with them via means such as customer surveys.

We use the customer survey to map our customers’ needs so that we can better understand our impact. We take their feedback and expectations into account in our decision-making and actions.

Customer survey

We have been systematically gauging customer satisfaction since 2011 via market research. The Net Promoter Score (NPS) gives an indication of the probability that customers will recommend Argenta, for example to family and friends. The score thereby correlates with customer loyalty. The score is expressed in numbers from -100 to +100, with 0 as the median.

The surveys are sent out to customers as well as non-customers. We use them to gain feedback on product range and services, and sound out possible changes we want to introduce. The feedback is processed by Marketing and Sustainability and is then cascaded down to the relevant departments so that specific actions can be set up as necessary.

Since 2024, we have asking our customers questions about our communication, via face-to-face and digital interviews. We show them actual letters or documents and ask them which parts of them they find complex. Based on their feedback, we improve our communication so that we can make them simpler and easier to understand.



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In 2024, “speed dates” were organised between employees and customers in Belgium. This provided a unique opportunity to meet customers in person, to talk about what they expect from Argenta and to listen to what makes them satisfied or dissatisfied. We also glean feedback from our customers via the branch network. Our employees can do a branch internship, which gives them the opportunity to see what goes on in a branch, who the customers are that come in, and what these customers ask and expect. Employees can also listen in at the contact centre, where they can hear at first hand the questions, problems and concerns of our customers. We then translate the findings from these initiatives into Argenta’s commercial policy.

The Marketing and Sustainability department is responsible for setting up, sending out and analysing the market research. The Executive Committee determines the actions and objectives arising from the results of the research.



Processes to remediate negative impacts

If our digital services fail to take financial literacy into account and/or exclude specific groups, it can create a negative impact on the customer. The branch and contact centre provide a first point of contact to discuss problems and offer help. If customers do not find that contact to be sufficient, they can submit a complaint to the Complaints Management department, which then works to find a suitable solution together with the customer.

Various options for submitting complaints are available to customers via Argenta’s website. They can send an e-mail, write a letter or submit an online form. The Complaints Management department aims to respond to a customer complaint within 10 days. Each customer always receives an acknowledgement of receipt with a complaint file reference number. In the case of complex complaints, the processing time can take longer but customers are kept duly notified.

The complaints management process is not only vital for responding to individual complaints, but also for finding structural solutions to problems that have led to complaints. Complaints Management discusses specific files, escalated cases and structural pain points with the relevant departments to find solutions and areas of improvement together. Complaint managers act as an independent body and play a key role in improving the customer experience. Complaints are reported internally each month, including to the Executive Committee. The Branches and Contact Centre department is responsible for further tracking the complaints.

If customers are not satisfied with the proposed solution, they can present their file in writing to external bodies: Ombudsfm (the financial dispute mediation service) for banking products and the Insurance Ombudsman for insurance products.

Customer contact with the contact centre and branches is surveyed via customer surveys organised by the Marketing and Sustainability department.

For complaints concerning data privacy and security, all customers and employees can make use of the “Responsible Disclosure” facility offered on Argenta’s website. If customer data security and privacy may have been compromised, customers can report that via the relevant form or get in contact with their branch or the contact centre. Argenta’s Security Incident Management team investigates all reports and takes action, where necessary, to identify and amend the reported vulnerabilities.

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Argenta shares its extensive pool of knowledge with its customers to inform them of the possible risks of phishing and how to recognise them. Argenta regularly communicates with its customers about such possible attacks. They can also contact Argenta’s fraud helpdesk 24/7 to report a phishing attack or fraud incident.

Customers can also use the “Responsible Disclosure” facility to report vulnerabilities in the digital systems to experts who are authorised to investigate reports and take action. This is how we promote information security for the customer.

Argenta uses Managed Security Services for support in monitoring security, detecting issues and responding to them. As a result, we can respond quickly and effectively to threats from the cyber landscape. Employees can also access the internal whistleblowers’ scheme to report (attempted) illegal, immoral or non-legitimate practices, so that responsible action can be taken.

The effectiveness of the complaints management process is also reflected in the level of customer satisfaction.

Actions

Actions and targets concerning our customers form part of the '23-’26 strategy, and fall under the strategic pillars of ‘customer relevance’, ‘simplicity’ and ‘professionalism’. When implementing actions, we focus on two areas: consideration for security and acting responsibly vis-à-vis our customers.

The actions are determined and monitored each year via the strategic roadmap. Our policies form the general framework within which actions and targets are determined and implemented.

Consideration for security

Data privacy and security are key matters within the scope of the security of all our customers. We endeavour to increase vigilance among our staff as well as to take measures to protect the data of our customers. We foster a culture of transparency and respect for privacy. That means that we communicate clearly and openly about the personal data we collect, use and protect and how we do that. Customers can also get hold of clear information on this matter in the branches and via the privacy statement available on digital channels (website, app, internet banking). They can access their data in a straightforward way, and easily make changes to their privacy settings.

In 2025, we intend to continue focus on improving our cyber maturity in a systematic and demonstrable way. In doing so, we will prevent any disruption to the services we provide customers on account of cyber incidents. If an incident occurs, we keep its impact to a minimum. In the course of 2025-2026, we want to be externally audited and certified in the area of information security.

Training and awareness

We continue to pursue existing initiatives, such as the annual security awareness training on ICT cyber security, and supplement this with monthly training sessions.

We invest in training and awareness programmes for all employees to ensure that they understand and comply with the privacy legislation. For example, we run training on the basic principles of the GDPR, which new employees are required to attend. We also have training sessions on ‘privacy by design’ for employees who, on account of their role, need to be familiar with the privacy principles to ensure that the privacy of data processing always remains guaranteed. Finally, we make employees aware of data leaks and the corresponding reporting channels, so that they can quickly and effectively respond to a potential data leak.

We consciously opt for training as a preventive measure to mitigate risks relating to cyber security and data privacy.



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DORA legislation

Last year, processes and procedures were reviewed in the light of the future DORA legislation (Digital Operational Resilience Act). DORA aims to strengthen cyber and ICT security in the financial sector. The legislation states inter alia that critical and important functions (CIF) supported by ICT services must comply with additional requirements. We launched a number of initiatives to gain a clearer idea of these additional requirements.

The process of implementing the DORA legislation started in 2024, and continues into 2025.

The CISO (Chief Information Security Office) is responsible for actions relating to data privacy and data security.

Acting responsibly vis-à-vis our customers

Responsible marketing involves taking the environment and the social impact of our products and services into account. A responsible marketing policy is based on principles of integrity and transparency: communication must be geared to the customer, and products and services must meet customers’ needs.

Our products are not adorned with beautiful slogans and eye-catching ads. Customers have to be able to trust that our advice matches their needs and profile. A transparent consent management and sound PARP policy help achieve this.

By targeting our commercial communication, we want to reach the right customers with the right information. We do this, for example, by being aware of the age of our customers, which must be in line with the specific commercial action, or by approaching customers who have shown interest in a specific product in the past, perhaps by clicking on a banner or product simulation. In doing so, we make sure we adhere to regulations, such as the e-Privacy Directive. Customers are at liberty to themselves change their commercial communication preferences at any time in the Argenta app or via internet banking.

We are committed to simple and clear communication. Our aim is to enhance our customers’ peace of mind and autonomy. We share knowledge and know-how about financial topics in a simple way. We developed the “Put simply” campaign – a campaign tailored to financial education. Difficult concepts or terms are explained simply via our social media channels.



A social media post in which we explain a financial concept in simple terms. Here: the certificate of conformity.



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We will continue these actions in 2025 too, and remain committed to clear and accessible use of language. From June 2025 onwards, all external communication is required to comply with language level B2 under the Accessibility Law.

Argenta serves its customers via its physical channels (the branches and contact centre) as well as digital channels (such as the Argenta app and Argenta internet banking). Digital services and social inclusion are closely linked. Through all our marketing messages, we want to communicate a representative image of society. The financial and digital literacy of our customers is taken into account to prevent any potential negative impact.

Last year, for example, actions were initiated to make the app more accessible for visually impaired, blind and dyslexic customers:

- We included a voiceover
- We enhanced the contrast and adjusted the colours

Under the anti-discrimination policy, checks were made to ensure social inclusion in our services. Key aspects in the decisions we make include the size of the target group. By double-checking this aspect, we mitigate the risk of making adjustments for too small a group of customers. All proposition senior managers are responsible for the actions relating to responsible marketing practices, social inclusion, customer satisfaction and digital services, with support from the Marketing and Sustainability department.

The actions we take in respect of our customers can be linked to the targets we set. The cyber security & awareness training and customer satisfaction are two important metrics for measuring the effectiveness of our actions.

The proposition senior managers are responsible for implementing the actions, request the necessary budgets for them, and monitor the resultant actions via the strategic roadmap. They are supported in this work by the Marketing & Sustainability department. The above actions fall under the current budgets.



An insurance campaign that focuses on our strength: branch staff who explain even the smallest details in simple terms.

Our targets

Based on the impact, risks and opportunities we have identified, we set targets in two domains. Our policies form the general framework within which actions and targets are determined and implemented. Targets are decided on by the Executive Committee.

Security for customers

Each employee is expected to complete the annual mandatory training on cyber security and awareness. We set the target of at least 95% of employees attending this mandatory training.

The internal training platform is used to measure and monitor the figures on attended training sessions (mandatory as well as additional training sessions), with reporting taking place on a quarterly basis. Employees who have not completed the mandatory training are monitored via the sanctions policy.

The target is tracked by the Chief Information Security Office.



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Customer satisfaction

Customer satisfaction is a major metric for monitoring the ‘customer relevance’ pillar in the strategy. Customer satisfaction is measured using the NPS score – a widely-used method for mapping customer satisfaction. It has been in use at Argenta for some time now, so comparisons between figures can be made. The target aims for a score of ≥ 50.

De NPS wordt maandelijks bevraagd via het klanttevredenheidsonderzoek met The NPS is requested each month via the customer satisfaction survey to 1,000 respondents (changing group of customers), which is sent out by Argenta itself. We sound out customer satisfaction via the question: “Based on your experiences over the last 12 months, how willing would you be to recommend Argenta to friends, family or colleagues?”. In 2024, the NPS score was +54. The figures are always compared with the previous year to measure progress.

Net Promoter Score

The Net Promoter Score is a standard benchmark used in business all over the world. It is therefore a good way of measuring how your company’s performance compares with that of competitors.

THE SURVEY

The score is based on a **short survey** and provides a picture of customer loyalty. The survey measures the extent to which the customers involved are willing to recommend a specific company to their friends or acquaintances. Customers answer one simple question after which a formula is applied to convert their answers into a single overall score.

THE QUESTION

“How likely is it that you would recommend this company to a friend, colleague or business partner, with a score from 1 to 10?”

THE score

The scores are divided into **3 groups**:

The formula for calculating **NPS** = $\% - \%$

1 2 3 4 5 6 7 8 9 10

Detractors Passives Promoters

We call anyone who gives a score of 9 or 10 a **“promoter”**: Promoters mostly display behaviour that leads to more turnover: they buy more, stay with the brand for longer and recommend it to more people.

We call anyone who gives a 7 or 8 a **“passive”**: Passives are regarded as reasonably satisfied customers. They are likely to remain loyal to the brand, but may easily switch to another under the right circumstances.

We call anyone who gives a 6 or less a **“detractor”**: Detractors are (mostly) dissatisfied customers who may damage your brand’s reputation with negative reviews, stories on social media or verbal communication.

According to Bain & Company

an NPS score of 0 = okay
an NPS score of 20 = good
an NPS score of 50 = excellent
an NPS score of 80 = world class

*Bain & Company is an American management consulting company

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‘Simplicity’ is another key pillar in our strategy. We measure that by asking our customers about our services and the processes they encounter. Customers appreciate our approach: 82% of respondents find it straightforward to do their banking at Argenta.

Entity-specific matters
Tracking of innovation and trends

Impact, risks and opportunities
Focusing on innovation also presents an opportunity – guaranteed future-proofing through innovation. By adopting new technologies, we can speed up and simplify processes for the customer.

However, there are also risks associated with innovation. For example, the risk of a higher number of cyber attacks, because criminals keep adopting new technologies. Innovation also entails a potential risk of financial loss if focus is directed towards the wrong area.



Finally, innovation can have a negative impact on the environment. For instance, the use of artificial intelligence generates high CO₂ emissions.

Policy and actions
There is no specific policy regarding innovation at Argenta. The focus of Argenta’s efforts in the innovation sector lies on proactively tracking trends and new technologies. We do this by visiting specific trade fairs as well as tech and fintech events. Furthermore, we are a member of various network groups in which innovation professionals exchange ideas and best practices, and we maintain valuable contacts within the sector. We make intensive use of curated public sources, such as podcasts, online video channels, blogs, newsletters, trend-watching reports and specialist literature.

Argenta has an Innovation Expert working within the Marketing and Sustainability department. This person is the first point of contact within the organisation and is responsible for exploring and mapping trends and innovation within the financial sector and new technologies.

The information and know-how gathered by the Innovation Expert are shared internally with the organisation via a number of different channels. In this way, we make sure that everyone keeps their finger on the pulse. We regularly publish posts on our innovation blog and send out monthly innovation newsletters.

We are currently working on the launch of a monthly podcast. Apart from that, we encourage in-person contact through informal discussions and tailored presentations for departments, stimulating lively discussions on innovative topics. We arranged an interactive and dynamic session specifically on artificial intelligence (AI) with the Board of Directors (via a strategic offsite event in June 2024), to explore the possible role of different forms of AI within our organisation.

The Innovation Expert works on defined topics in close cooperation with the Data & Delivery department, developing a selection of relevant issues and cases into projects.

To date, no specific targets have been defined with respect to innovation.



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Proximity to our employees

As Argentans, we are warm, family-oriented and committed, but we also take initiative and assume responsibility. Argenta wants to be close to its staff in Belgium, the Netherlands and Luxembourg.

Material impact

Argenta has a direct impact on its employees via its strategy, policy and corporate culture. As we are a Belgian bank and insurer, our employees are mainly based in Belgium, but we also have staff working for Argenta in the Netherlands and Luxembourg. The head office in Antwerp accommodates employees from supporting departments, such as IT, marketing and communication, as well as employees who offer support for the propositions, departments responsible for controls and monitoring, and lastly the managers and supervisory bodies. A branch office is located in Breda, where staff work in the area of Dutch lending and savings activities. Finally, there is an office in Luxembourg, where Argenta Asset Management is based.

Our human capital is a key means of running our bank. Their time, expertise and skills, including the investments made in training and development are essential sources.

We have a positive impact on our employees via the pay policy, with primary consideration given to transparency and certainty. Bonuses are deliberately not included in this remuneration package. Each employee is given an overview of their salary package and how remuneration will evolve over the course of their career.

We are concentrating on the positive impact we are making via training. We offer employees the opportunity to develop themselves in new specialist areas within the context of changing technologies and legislation. Through knowledge and skills, employees can grow into their role as well as benefit from the opportunity of growing within the organisation and taking on new roles.

Finally, as an organisation, we also have a positive impact on the commitment of our employees via the policy and actions we pursue.

The in-house employees in Belgium, the Netherlands and Luxembourg may experience a material positive impact on remuneration, training, development and

the absence of any bonus culture. Staff not in salaried employment – limited to interns and temporary & agency employees (including job placement students) – may experience a positive impact in terms of commitment and training & development.

Argenta has been working on the revised salary policy since 2023, under the “Argentans” strategic pillar. Internal processes are being optimised at Argenta Group level and the new tool for the cafeteria plan has since been integrated. Our aim under the skills management project is to gain a better overview of the knowledge and skills gaps of our employees and address them in targeted ways, such as via a sound policy and range of training. Specific developments required to support our transition plans were also included in this analysis. To further strengthen the resilience of our strategy, Argenta is working to develop a strong organisation culture.

A healthy mix

We make a distinction at Argenta between in-house employees and non-salaried employees. In-house employees are employees for whom a permanent or fixed-term contract has been entered into between one of the companies in the Argenta Group and the relevant employees, with Argenta acting as the employer.

Non-salaried employees are employees for whom a fixed-term contract has been entered into between one of the companies in the Argenta Group and the business or management school, supplier or temporary employment agency and the employees involved. This group of employees includes interns, consultants with specific positions, consultants with specific assignments, temporary or agency employees (including job placement students) and contract employees.

Argenta adopts a policy in which positions that need to be filled in the long term are filled by in-house employees. This is important in terms of ensuring a long-term relationship with the relevant employee and being able to retain the requisite knowledge within Argenta.

For Argenta, every employee is a talent. By recruiting the right people, Argenta can grow and realise its strategic ambitions. We give in-house employees as many opportunities as possible to enhance their career within Argenta. We want to maintain an inclusive environment at Argenta. Argenta’s workforce therefore consists of a healthy mix of all kinds of people.



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Characteristics of our in-house employees

By “head count”, we mean the number of active in-house employees employed at the Argenta Group as at 31 December 2024. The characteristics refer to in-house employees in Belgium, the Netherlands and Luxembourg, excluding the characteristics only applicable to our companies with at least 50 in-house employees. This is indicated in each case in the additional data.

All employees who have left the company are included, with the exception of staff transfers to another company within the Argenta Group. The “turnover percentage” covers the number of employees who left the company in 2024, in relation to the total number of employees employed as at 31 December 2024.

Head count by country (BE, NL and Lux) as at 31 December 2024

Country	2024
Belgium	1,151
The Netherlands	78
Luxembourg	21

Head count of in-house employees, by gender (only employees in Belgium and the Netherlands are included in this scope)

Gender	2024
Male	666
Female	563

Head count of permanent in-house employees, by country

Country	2024
Belgium	1,149
The Netherlands	67
Luxembourg	21
Total	1,237

Head count of permanent in-house employees, by gender

Gender	2024
Male	672
Female	565

Head count of fixed-term in-house employees, by country

Country	2024
Belgium	2
The Netherlands	11
Luxembourg	0
Total	13

Head count of fixed-term in-house employees, by gender

Gender	2024
Male	9
Female	4



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Head count of full-time in-house employees by gender and country

Country	Gender	2024
Belgium	Male	572
Belgium	Female	351
Luxembourg	Male	9
Luxembourg	Female	1
The Netherlands	Male	33
The Netherlands	Female	22

Head count of part-time in-house employees by gender and country

Country	Gender	2024
Belgium	Male	58
Belgium	Female	170
Luxembourg	Male	6
Luxembourg	Female	5
The Netherlands	Male	3
The Netherlands	Female	20

The workforce at Argenta is 46% women and 54% men.

Argenta signed the ‘Women in Finance’ charter, which strives for greater gender equality in the financial sector.

Head count of in-house employees who left the company in 2024

Country	2024
Belgium	108
The Netherlands	7
Luxembourg	2
Total	117



Turnover percentage of in-house employees

Country	2024
Belgium	9.63%
The Netherlands	9.46%
Luxembourg	10.53%
Total	9.72%

Characteristics of non-salaried employees

By head count, we mean the number of active non-salaried employees employed at the Argenta Group as at 31 December 2024. The characteristics refer to the non-salaried employees in Belgium, the Netherlands and Luxembourg.

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Head count of non-salaried employees broken down by type of external employee.

Country	Temporary employees with specific positions	Consultants with specific positions	Temporary employees with specific assignments	Consultants with specific assignments	Job placement student	Intern	Contract employee	Director
Belgium	4	121		152	3		570	21
Luxembourg								
The Netherlands	4	6	2	4	2	1	6	

Diversity

The number of members of senior management (head count) broken down by gender. Senior management at Argenta is made up of executive Directors (Executive Committee) and the senior managers reporting directly to them with each senior manager heading a department. Together, they form the Nexus.

	Gender	2024
Argenta Group	Male	26
Argenta Group	Female	12

The number of members of senior management and employees (head count) broken down by age category (< 30; 30-50; >50)

	Age category	Senior management	In-house employees
Argenta Group	<30	0	124
Argenta Group	30-50	13	758
Argenta Group	>50	25	368

Work-life balance

Argenta offers standard full-time positions within the organisation. Part-time work is possible on request of the employee, so it is a completely voluntary choice. Employees mainly ask for part-time work to improve their work-life balance. Part-time work is possible in different arrangements: time credit, thematic leave and contractual part-time. All employees are entitled to at least one of the types of family leave.

The percentage of in-house employees who have taken family leave in relation to the total number of employees entitled to family leave broken down by gender.

	Gender	Family leave in relation to total
Argenta Group	Total	7.68%
Argenta Group	Male	4.41%
Argenta Group	Female	11.60%

Collective bargaining agreement

The national collective bargaining agreements (CBAs) are monitored by country for all in-house employees. The relevant CBAs for Belgium are under joint committee 310. There are also company-specific CBAs, such as:

- CBA on teleworking policy
- CBA on pay policy
- CBA on working hours
- CBA on harmonisation of articles of association
- CBA on employment plan for older members of the workforce
- CBA on banking (applicable in the Netherlands)
- CCT Banque (Convention Collective de travail – applicable in Luxembourg)

The CBAs are applicable to all employees (100%) unless specified otherwise. For example, the CBA on teleworking policy does not apply to employees with a field service role.

100% of in-house employees are represented by an employee representative body.

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Pay gap and total remuneration

The difference between the average gross hourly pay level of male in-house employees and the average gross hourly pay level of female in-house employees at the end of a given year divided by the average gross hourly pay level of male in-house employees at the end of a given year.

	2024
Argenta Group	11.24 %

These percentages are an unadjusted overview of the difference in average gross hourly pay level between male and female employees. The figure does not take into account any other significant aspects, such as experience, domain, pay category and level of education, so it gives a distorted picture. Each year, Argenta carries out a pay gap analysis which explores these aspects in greater detail. The results are discussed each year on the Work Council.

No significant pay gap was observed in 2023 or 2024. Remuneration is in conformity with the market and in line with the market benchmark.

Total remuneration package for the highest paid in-house employee divided by the median amount of all in-house employees, excluding the highest-paid in-house employee.

	2024
Argenta Group	2.97

Policy

Social, economic and cultural rights fall under human rights recognised by international treaties and the Belgium, Dutch and Luxembourgish constitutions. These rights cover a significant share of the human rights in connection with labour and employment. They form a layer of protection required to ensure that the working conditions meet minimum conditions in terms of dignity, fairness and protection. These rights are safeguarded by binding legislation, such as labour and welfare legislation, social dialogue as well as inspection services. Argenta’s charters and policies are based on labour and welfare legislation applicable in Belgium, the Netherlands and Luxembourg. Our charters and policies do not refer directly to provisions relating to human trafficking, forced labour and child

labour, because these are by definition prohibited under the Belgian, Dutch and Luxembourgish labour and welfare regulations. Argenta respects and underpins the UN Guiding Principles in Business and Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. We communicate these rights and the importance of respecting them to our employees and expect them to do so accordingly.

The charters / policies encompass the positive impact Argenta wants to have on its employees:

- Pay policy for non-directors
- Governance Memorandum
- Integrity Charter
- Anti-discrimination policy

These four charters / policies are reviewed at regular intervals to ensure that the policy is in line with strategy and the latest legislation and regulations. They are all four applicable to the Argenta Group and all its companies. With respect to their applicability in the entities outside Belgium, local legislation and regulations are examined specifically and the tactical translation of the policy for the relevant entity is also verified against these local laws and regulations.

Pay policy for non-directors

The policy describes the principles applied by Argenta to achieve sustainable and correct remuneration for the (non-director) employees of Argenta’s companies in Belgium. It is based on ‘Health Growth’ – Argenta’s human capital vision. The foundations of this policy comprise four core principles:

- Sustainability
- Market conformity
- Purchasing power
- Transparency

The director of Organisation & Talent is the owner of the policy. The Executive Committee, Remuneration Committee and Board of Directors are competent for their implementation.



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Governance Memorandum

The Governance Memorandum sets out the company values (close at hand, enterprising, pragmatic and simple), the strategic objectives and the internal governance. The strategic objectives specifically establish a link with Argenta’s policy in areas such as remuneration, career development and monitoring, and access to training. In line with the anti-discrimination policy, Argenta gives each employee equal opportunities with a focus on talent.

The Argenta Group strives to remunerate its employees in line with market conditions. The salaries of employees, administrative staff, management and members of the Executive Committee of Argenta therefore comprise a fixed amount alone. No variable remuneration, shares, stock options, entry bonus or deferred compensation are granted.

The pay policy determines which remuneration package applies to which jobs, taking into account the degree of difficulty, responsibility, level of required training or experience and necessary specialisation of a particular job. Argenta expressly pursues a gender-neutral pay policy. The employee’s function is the sole factor which determines their pay category, and the pay category determines the remuneration package of the employee concerned.

In addition, this policy also refers to the code of conduct and behaviour. Corporate governance cannot be achieved on the basis of organisational structures, procedures and control mechanisms alone, it relies to a significant extent on the commitment and dedication of all Argenta’s employees.

The Secretary-General is the owner of this policy. The Executive Committee, Remuneration Committee and Board of Directors are competent for their implementation.

Integrity Charter

Argenta is aware that encouraging and ensuring integrity are important, for its employees too. The Integrity Charter also forms the basis for Argenta’s banking and insurance policy and serves as a guideline for actions and decision-making.

Integrity implies allegiance not only to the laws and regulations but also to the generally accepted standards in the banking and insurance sector, as well as

to our own purpose and company values: close at hand, enterprising, pragmatic and simple (DOPE).

Our purpose and focus values ensure that Argenta remains a unique and successful company. Respect for integrity and the business ethics of a banker-insurer is a precondition for being active in the financial sector and performing our social role as part of the financial sector. Our purpose, focus values as well as business ethics are crucial for putting Argenta’s mission and strategy into practice. That is why they must be instilled in how everyone behaves. They differ in their nature, so a different approach needs to be adopted to put them into practice:

- To implement the Charter, all employees and partners of Argenta must first and foremost apply and promote the principles of the Charter in their daily activities and conduct. For specific situations, the principles are translated into a separate policy or regulatory framework. If there is no supplementary framework, the standards of the Integrity Charter must still always be applied in decision-making.
- Ethics, focus values and business ethics are in themselves a charter for conduct or decisions. For specific situations, they are translated into a specific policy or regulatory framework. Ethics, focus values, business ethics and the associated framework together form Argenta’s integrity policy.

It is important for Argenta to ensure its own value-conscious and ethically responsible conduct, but also for employees to safeguard their personal integrity. They do that by always respecting the business ethics and integrity, complying with the rules, extending this beyond the workplace and avoiding conflicts of interest. It is important that they hold each other to account about good and bad practices in the area of integrity. Firstly, by giving each other feedback. But also by reporting infringements of integrity and business ethnics to managers, the Compliance department, the confidential contact person or, in exceptional cases, anonymously via the whistleblowers’ scheme.

The Charter is binding on employees at every level, irrespective of the nature of the role they perform. In this way, we pursue an integrity policy that is coherent and consistent at Group level. If the Integrity Charter is not complied with, there may be far-reaching consequences for the reputation of the organisation.

The Compliance director is the owner of this policy. The Executive Committee is competent for its implementation.



The Charter is publicly available via [Argenta's website](#).

Anti-discrimination policy

Discrimination is the unequal or unfair treatment of another person based on personal characteristics. Argenta adopts the Belgian anti-discrimination legislation as a principle of its anti-discrimination policy.

These anti-discrimination laws prohibit discrimination on the grounds of one or more of the following protected criteria: disability, religion or belief, sexual orientation, age, financial status, marital status, political or trade union affiliation, health status, physical or genetic characteristics, birth, social origin or status and language, nationality, national or ethnic origin, “race”, skin colour and background, gender, pregnancy, birth process, breastfeeding, maternity, adoption, assisted reproductive technology, gender identity, gender expression, including medical or social transition, sexual characteristics, paternity, co-motherhood. There is no place for discrimination within Argenta. Argenta strives to maintain an inclusive environment and makes no distinction in recruitment or in-house advancement based on the above criteria.

Diversity quotas are set specifically for the Board of Directors. To find out more about these quotas, read [here](#).

If an employee experiences discrimination, suspects discrimination and/or is witness to discrimination via-à-vis a colleague, customer or service provider, Argenta urges them to always report it.

- Employees and managers can report discrimination in different ways:
- Reporting via one of the internal confidential contact persons within Argenta. The list of internal confidential contact persons and their contact details is available on Connect, the internal communication platform
 - Reporting via one’s line manager
 - Reporting via Organisation & Talent, e.g. via the O&T coach.
 - Reporting via Compliance
 - Escalating via the whistleblowers’ scheme. The report is submitted directly to the Internal Audit director. The procedure involved in the whistleblowers’ scheme is explained on Connect
 - Lastly, in Belgium, by contacting Unia or the Belgian Institute for the Equality

of Women and Men (IGVM). However, Argenta hopes that any instance of discrimination is first handled internally and in consultation between the parties.

Argenta ensures that any report of discrimination is handled with the requisite discretion and takes the necessary measures to prevent the persons involved from experiencing any negative consequences as a result of the report. Any complaint in connection with undue discrimination will be thoroughly and carefully investigated internally. If necessary, Argenta can take remedial action or apply sanctions, with due regard for all legal provisions and the gravity of the infringement.

The Compliance director is the owner of this policy.

Safety and welfare

Safety and well-being form an integral part of Argenta’s processes and policies.

- Argenta’s well-being policy is based on 2 principles that aim to prevent accidents at work:
- Conformity with legislation and safeguarding of the compliance level: we make sure that all our activities and processes comply with the applicable legislation and regulations.
 - Guarantee of safe and healthy working conditions: We commit to creating a work environment in which the health and safety of our employees take priority. This involves conducting regular risk inventories and inspections at the workplace.

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Engaging with employees about impacts

Consultative bodies

Our organisation has various processes and channels for achieving a positive impact and offering employees the option to express their concerns. The Works Council, Committee for Prevention and Protection at Work (CPBW) and union delegation play an important role in these processes. As part of its duty of care, Argenta uses the employee survey to sound out what impacts employees the most.

Consultation via a range of different channels

Through various channels and committees, Argenta promotes communication between the organisation and employees. Relevant issues concerning working conditions, work organisation, remuneration and education & training of staff are discussed within these committees in a constructive atmosphere and with mutual understanding. Representatives of the Executive Committee, Organisation & Talent, the internal prevention adviser and trade unions sit on the committees. They meet every one or two months.

In 2024, the subjects discussed included the cafeteria plan, training plan, safety and welfare, and the feedback culture. Employees can consult the reports of the Committee for Prevention and Protection at Work and the Works Council on Connect.

Frequent team consultations between managers and employees, trade union representatives, confidential contact persons and O&T coaches (who provide support in the development of employees, teams and the organisation) play an important role in communication and support within the organisation. This informal consultation supports the formal channels and is a means of checking the effectiveness of those channels.

Employee opinion surveys

- We regularly carry out surveys among our employees to ask them directly for their opinion:
- Once a year, we measure the commitment and ambassadorship of all employees via an Employee Opinion Survey. We ask questions on all aspects impacting their perception of work.
 - Every two years, we carry out a well-being survey to measure all elements impacting the well-being of employees.

In March 2024, employees again had the opportunity to express their opinion via the Employee Opinion Survey. This year, our employees were asked questions on commitment, motivation climate, ambassadorship and well-being. The results of this survey are an important means of testing for Argenta. Using the results, we want to check whether we are managing to achieve the commitment and general satisfaction of our employees via our policy and actions. The survey is also used as a means of communication to enter into dialogue with our employees.

The results are presented to the Executive Committee and Works Council, and also to our employees, via a detailed video presentation from our CEO, organised by Organisation & Talent and via the Connect intraweb environment.

Based on the results, the O&T coaches, together with the senior managers, set about defining the necessary action plans. These actions plans are then presented to and monitored by the Executive Committee and the Works Council. The director is responsible for communication to employees within the their department.

Processes and channels for expressing concerns and complaints

Argenta wants to primarily focus on direct contact between the employee and manager or between employees and O&T coaches to discuss their concerns. The internal prevention adviser and confidential contact person can also be easily contacted by employees. Argenta arranges learning and consultation meetings for managers and O&T coaches, giving them an opportunity to share any concerns and feedback as well as grow in their role through shared experiences.

We have a whistleblowers' scheme via which employees can report their concerns or complaints if they are unable to do so via their manager or other contact persons. The Internal Audit director is designated as the contact person and owner of the process. Substantiated reports are discussed in the Executive Committee at the end of which improvement actions are defined. In 2024, two reports were submitted via this process; both were declared to be unsubstantiated after investigation.

The anonymity of the person submitting the report is always ensured. Their identity is only known by the contact person appointed by Argenta to carry out the independent investigation. Argenta follows the legally defined protection measures for persons submitting reports and other individuals involved, such as third parties or facilitators. Please refer to [6.4.1](#) on corporate culture and business conduct

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policies for more information on the whistleblowers’ scheme.

The contact persons and support channels are accessible for all employees. They are informed of the existence of these channels via the well-being page on the intranet and via the mandatory e-learning sessions on fraud and integrity. The channels are also specified in the well-being survey which Argenta conducted on all in-house employees in October 2024.

The process must be as accessible as possible. There are therefore no specific procedures or times to be adhered to by employees. If the contact person does not have the necessary expertise, that person can refer the employee to experts available for example at the External Service for Prevention and Protection at Work. The contact persons communicate transparently with the individuals involved and provide information to reach a constructive solution where necessary. If needed, we make adjustments based on experiences with the contact persons or via the channel contacted by employees for assistance. In 2024, this was not necessary. Concerns and complaints to be further monitored are identified through coordination between the internal and external prevention adviser and through monitoring via the respective persons responsible within the second line.

Analysis of our channels

The Monitoring & Investigations team in the Compliance department conduct an annual survey of Organisation & Talent to collect and handle complaints from employees.

We assess our policy each year, so information on complaints, interventions and requests is collated for this too. We collate the following information for this assessment:

- Requests for a risk analysis of specific work situations
- Requests for a formal psychosocial intervention
- Information provided by the prevention adviser / occupational doctor
- Facts recorded in the register of facts committed by third parties
- Statistical data on psychosocial risks included in the annual report of the Internal Service for Prevention and Protection at Work
- Requests handled informally by the confidential contact person or the prevention adviser on psychosocial aspects

This data helps us map needs more effectively and check whether employees are finding and using the various channels.

We also ask our external prevention advisers on psychosocial aspects, occupational doctors and confidential contact persons if they have any further indicators possibly pointing to specific (mental) well-being risks.

In 2024, we included a question in a well-being survey for the first time explicitly asking whether respondents knew who the confidential contact persons and/or prevention advisers were.

Actions and targets

The actions and targets concerning our in-house employees form part of the ’23-’26 strategy, and fall under the “Argentans” strategic pillar.

In each case, the actions are determined and monitored yearly via the strategic roadmap. The policies (see above section) form the general framework within which actions and targets are determined and implemented.

Commitment: from employee to ambassador in terms of actions

The sustainable development of commitment and ambassadorship is an important component of Argenta’s HR vision. Both are strongly linked to a healthy work-life balance, well-being at work and personal development.

“Healthy Habits” programme

- In this context, Argenta Belgium has been running the “Healthy Habits” programme since 2023. Argenta wants to inspire and motivate its employees to pursue healthy habits:
- Employees have access to training on aspects such as healthy eating, vitality and ergonomics;
 - Access to the Brainwise programme, via which they can start working with a sleep coach;
 - Participation in a stop-smoking counselling group;
 - Individual support from a well-being coach;
 - Option to attend a weekly yoga class during lunch break at head office.

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Resilience training

Further to the results of the 2023 Employee Opinion Survey, the decision was made to set up an action point on skills in the scope of the positive stress management of employees. This action point led to the introduction of resilience training. The internal prevention adviser was jointly responsible for this, together with Learning & Development staff, and the training was rolled out for all in-house employees in Belgium.

As part of an individual development process, employees are given the opportunity to work on their resilience during and after working hours. The training is developed around three pillars: exercise & nutrition, balance & resilience and motivation & work organisation.

Wide variety of training and development

Argenta provides for a wide range of training for all employees, so that they can work on their flexibility in the longer term, including in the event of changes in strategy. The training includes mandatory and optional courses and contributes to the development of various skills:

- We offer courses, e-learning, coaching, exchanges of knowledge and experience among colleagues, and interactions with senior managers.
- We focus on six areas: professional growth, personal growth, leadership, team development, technical training and mandatory training.
- Argenta invests in digital training platforms with strong content, such as GoodHabitx, LinkedIn Learning, TheMasterChannel and Headspace. This enables the pursuit of learning outside working hours and even outside the immediate demands of a current job.
- In addition, every department has its own training budget so that it can take targeted initiatives to build professional expertise.
- Employees are invited to attend relevant external conferences and seminars.

The training is updated each year and is available via a digital learning platform. By this means, we contribute to Argenta’s long-term growth and draw on our employees’ development and growth potential. In 2025, the range of central training is again undergoing revisions.

The Argenta Passport provides the basis for further development and a sustainable career at Argenta. The Argenta Passport was developed together with the Antwerp Management School (AMS) under the guidance of Prof. Ans De Vos and focus groups within Argenta made up of managers and employees. The passport defines four core competencies:

1. Customer-oriented thinking and action: any action performed by any employee serves the purpose of further helping internal or external customers. Customer-oriented thinking and action are therefore of the essence.
2. Focus on results: we work specifically towards delivering the desired results.
3. Flexible in times of change: we embrace change with the requisite curiosity, keenness to learn and critical reflection, and we make sure that the change enhances the employees as well as Argenta.
4. Digital enthusiasm: we work on digital skills and explore new tools and technologies.



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Employees can start or continue to build on their passport using the passport competency scan. The scan clearly maps the extent to which the employee already applies the four Argenta Passport competencies and which ones can be further developed. It is also used in conversations between managers and employees during development reviews.

Cafeteria plan

Finally, as part of the remuneration package and in consultation with union delegations, options available in the cafeteria plan have been further expanded based on the needs of employees. As of 2024, in-house employees of Argenta in Belgium can now also opt for outpatient insurance for themselves and members of their family, intervention in pension savings at Argenta and peripheral equipment among the multimedia options in the cafeteria plan.

The actions that have been defined and undertaken are first communicated to the Works Council and then to all in-house employees via Connect, our internal communication platform.

Commitment: from employee to ambassador in terms of targets and results

The policy pursued and actions undertaken together form a cohesive whole contributing to the satisfaction and commitment of our employees. To measure and track the success of this element, the Executive Committee has decided, in consultation with Organisation & Talent, to carry out an Employee Opinion Survey each year. The survey is used to map commitment. Only in-house employees can take part in this survey. In 2024, 995 employees responded to the survey, which is equivalent to 90%. Each year, we work on the results of the Employee Opinion Survey to identify and address areas for improvement.

We measure commitment based on nine statements in the survey. We use these to determine the level of commitment of each respondent, ranging from ‘Disengaged’ to ‘Engaged’:

- The commitment score for 2024 is 91% for employees in Belgium. In the Netherlands, the score is 88%. The target is 80% and is therefore exceeded.
- The commitment score for 2024 is 94% for managers. The target for managers is 95%, which has not quite been achieved.
- Furthermore, 53% of employees feel very connected to Argenta.

Ambassadorship is measured using the eNPS statement: ‘I would not hesitate to recommend Argenta to my family or friends.’ We are aiming for a minimum eNPS of +50. For 2024, the eNPS is +41 in Belgium and +25 in the Netherlands.

Luxembourg is always included in the results of Belgium, to safeguard the anonymity of the results.

The e-NPS methodology is based on the original Net Promoter Score method developed in 1993 by Fred Reichheld.

The results of the e-NPS are first communicated, each time, to the Executive Committee and Works Council, who also determine actions to be taken, where necessary. The results are then communicated to all in-house employees via Connect.



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Overview of training and development²⁶

Average number of hours of training per gender and country, as well as the total number of hours of training per gender and country. All training attended by each employee is entered in an online training platform.

Country	Gender	Average number of training hours	Status as at 31.12.2024	Training hours 2024
Belgium	Male	4.5	630	20,831.08
Belgium	Female	4.1	521	15,777.90
The Netherlands	Male	7.0	36	1,837.26
The Netherlands	Female	6.2	42	1,889.50
Luxembourg	Male	2.6	15	281.80
Luxembourg	Female	1.5	6	66.00
Total		4.5	1,250	40,683.54

Incidents

In 2024, there were no incidents in the context of human rights.

²⁶Argenta makes partial use of the transitional provision with regard to training and skills development, cf. Article 83a S1-13 and as stipulated under Appendix C of the CSRD.



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Business conduct

Our purpose is the very reason we do what we do. Our story and purpose are timeless because, in the unpredictable world in which we currently live, they sound more relevant than ever. Every step we take has to contribute to our purpose. It therefore takes top priority in our corporate culture.

We look after our stakeholders in a thoroughly responsible manner by taking our responsibility in every branch of our management. Ethics and integrity are key components of pursuing responsible business conduct.

For information on governance and the various committees responsible for business conduct, including their role and expertise, please see [here](#).

Material impact, risks and opportunities

The materiality analysis found business conduct to be material, with corporate culture and anti-corruption also being key material matters. Other matters, such as conflicts of interest and whistleblowers' scheme are closely connected to these material matters, and, in this context, are also reported on in the following section.

For Argenta, business conduct is also closely connected to how we manage the money flows for our customers. Investing responsibly and locally was identified as a material entity-specific matter, with Argenta consciously choosing to generate positive impact for society via its investment policy. In this way, we support our objectives concerning the climate and society.

Positive impact

The principle of good governance or responsible business is closely linked to our purpose, culture and financial health. In this way, we want to care for our stakeholders in a thoroughly responsible manner (through acting responsibly and with integrity) both now and in the longer term.

Argenta's purpose has a broad social goal: as a banker-insurer, we want to take care of our stakeholders in an unpredictable world. All in-house employees work to achieve this goal and Argenta fosters its corporate culture as a basis for its employees. Feeling a connection with the corporate values can trigger a greater degree of commitment. This has a positive effect on recruiting talent, as interesting profiles apply for the positions because they feel aligned with the company. The biggest impact is seen on our own operations, among our employees, but an impact is also evident on customers and potential applicants, through the way in which they perceive us.

A financially healthy organisation can have an actual and potential positive impact on its environment, because it boosts employment (directly and indirectly): the positive impact can arise in the short, medium or long term for employees and branches, suppliers and partners, within the scope of investments, innovation, etc.

Intercepting transactions aiming to launder money or finance terrorism is one way in which we contribute to the general interest of society. We make the most impact downstream on customers, as well as more broadly on society.



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Negative impact

Employees who do not feel a connection with the corporate values can potentially become disengaged. Corporate values may also prevent potential applicants from applying.

A meaningless purpose which cannot be realised, with which employees cannot identify, can cause a divide between employee and Argenta. This has an impact on all stakeholders.

As a company, if you go bankrupt, this can have a huge impact on, for example, unemployment among employees and branches (branch managers and staff), the financial resilience of our customers who entrust their funds to us, the payment of suppliers, shareholders, investors, etc. The negative impact can arise in the short, medium or long term.

Mismanagement can damage the company's reputation. Existing customers may leave, or it will become really difficult to still attract new customers. The same applies to employees, branches or investors who do not wish to have anything further to do with the organisation. Additional sanctions or capital buffers may also be enforced by the regulator, to ensure the security of the organisation. This, in turn, impacts on the return for shareholders.

The principle of good governance is linked to a large range of other matters, such as compliance with ethical rules. If, as an organisation, we act unethically, we cannot properly protect our stakeholders from negative impacts such as cyber attacks or laundering. That may arise now or in the long term.

Responsible business is a matter driven strongly by regulations. If, as an organisation, we fail to adopt responsible business practices, we will be breaching the applicable regulations. And that might lead to financial sanctions.

Risks

If Argenta is linked to transactions to do with the financing of terrorism or laundering, that could lead to reputational damage. That risk is applicable both now and in the future.



There is also a risk of reputational damage in the event of mismanagement. This risk can have a negative effect on the relationship with existing and potential customers. The same applies to the relationship with employees, branches or investors. Sanctions or additional capital buffers may also be enforced by the regulator, to ensure the safety of the organization. This, in turn impacts on the return for shareholders.

If the financial health of the company is jeopardised, that could lead to bankruptcy, which in turn would have a direct impact on all our stakeholders in the value chain, and on our operational and business activities.

As a bank and insurer, we have a responsibility to provide sufficient protection for our stakeholders. When the principles of good governance and closely related issues such as compliance with ethical rules are compromised, there is a risk that we will not sufficiently protect them against cyber attacks or money laundering, for example. That may arise now or in the long term.

Responsible business is a matter driven strongly by regulations. If, as an organisation, we fail to adopt responsible business practices, we will be breaching the applicable regulations which in turn might lead to financial sanctions.

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Opportunities

By consistently applying the company’s values and making its employees ambassadors, Argenta can grow sustainably. That will contribute to the organisation’s sustainable growth in the long term.

A focus on anti-laundering activities will contribute to the organisation’s commercial, operational and regulatory interests, which in turn enables us to keep growing sustainably.

A financially healthy company is essential to guarantee the short-, medium- and long-term commitments and sustainable growth of the company. Financial health for a banker-insurer is essential for credibility, especially in the financial sector.

As an organisation, we want to be sustainably credible, which means we act ethnically in all matters relating to responsible business. If Argenta can position itself in the market in this way, there is a possibility of positive financial effects, and more customers. The possibility is actual as well as potential.

Corporate culture and business conduct policies

Argenta’s corporate values are described in the [Governance Memorandum](#) and elaborated in more detail in three charters:

- The [Integrity Charter](#) as the basis for the different codes of conduct: it forms an important basis for Argenta’s banking and insurance policy and serves as a guide for actions and decision-making at Argenta. Integrity means we are true to the generally accepted standards in the banking and insurance sector, but also to our purpose and specific company values: close at hand, enterprising, pragmatic and simple. In the second line, the compliance function plays an important role in creating and enforcing the integrity policy.
- The Suitability of Key Officers Charter, including a section on diversity, also forms a basis for Argenta’s banking and insurance policy and serves as a guideline for actions and decision-making.
- The [Sustainability Charter](#) describes our general ESG aspirations and forms the basis for the sustainability policy and sustainability action plan.

Argenta’s Governance Memorandum sets out its strategic objectives and corporate values, as well as the internal governance requirements for the whole Group. These internal governance requirements are geared to the Group’s structure, activities

and risks, and are in line with the legal and regulatory provisions on governance.

The ethical standards are further developed into thematic policies and internal codes of conduct, setting out what is and is not allowed in terms of conduct. Training and communication activities take into consideration the unwritten cultural and behavioural aspects, such as the importance of critical reflection and encouragement of a speak-up culture.

- **AML and Sanctions Policy:** establishes the principles applied by Argenta in managing laundering risks. The policy is fully integrated for the complete AML lifecycle, from onboarding, to carrying out transactions, to monitoring relationships. The principles of simplicity, honesty and proximity are central to the policy and support customers in the process of safeguarding their financial security. A risk-based approach is also adopted when entering into business relationships. Based on qualitative and up-to-date data collated during the identification process, Argenta arranges for targeted checks to be carried out on atypical transactions, behaviours and relationships. Adjustments are made to these checks, in terms of how they are designed and the degree of certainty of their robustness, in line with the risk they are intended to mitigate. Employees are also trained to recognise and report indicators of money laundering.
- **Conflict of Interest Policy:** As a banker-insurer, Argenta engages in a range of activities. In the performance of these activities, Argenta forms a specific relationship with its customers, employees and suppliers. Each of these parties has specific interests, just as Argenta has. These interests are often similar, but can also be divergent or even conflicting. Conflicts of interest can arise between the various parties, for instance between customers and Argenta or between employees and Argenta. Argenta takes adequate measures to prevent conflicts of interest from harming the interests of third parties, or employees from harming the interests of Argenta. This policy provides a framework for realising this objective. The aim of the policy is to identify potential conflicts of interest, enter them in a conflict-of-interest inventory and, where possible, prevent them. If a conflict of interest nevertheless arises, the requisite measures are taken and recorded in the conflict-of-interest register. If it is not possible to manage the conflicts of interest without damaging the interests of customers, they are provided with suitable information.

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- **Tax Prevention Policy:** outlines the relevant domains of tax prevention and the responsibility assumed by Argenta in preventing tax, criminal and/or administrative offences and promoting fiscal transparency. Charting a straight and fair course in the area of tax is one of the ways in which Argenta assumes responsibility vis-à vis people and society. Argenta combats criminality and unethical conduct by not giving customers the opportunity to move below the tax radar and, of course, not cooperating in such a move in any way whatsoever. What is more, Argenta contributes to (global) fiscal transparency by reporting financial information to the relevant tax authorities
- **Market Abuse Policy:** sets out the key principles adopted by Argenta to comply with rules and regulations on market abuse. These rules and regulations have been enacted at European level to protect the ethical operation of the financial markets by combating insider trading or market manipulation. The ban on market abuse includes a ban on insider trading and a ban on market manipulation. The policies on anti-corruption and bribery are in line with the UN Convention against Corruption and are monitored at second-line level by NFRM and Compliance. Both report to the Executive Committee of Argenta.

The above policies are applicable to the entire Argenta Group and all activities in Belgium, the Netherlands and Luxembourg. The Executive Committee is responsible for implementing the policies.

As a financial institution, Argenta wants to be in line with the sector standards and compliant with the applicable legislation and regulations. Policy implementation involves focusing on our daily practice, awareness and monitoring.

Our corporate culture – enshrined in our company values

The corporate culture of Argenta refers to the entirety of standards and traditions, as well as the rules and practices established by Argenta. In addition to level of integrity, it covers aspects such as the nature of the relationship with our customers, style of leadership, sustainability, remuneration culture, diversity and inclusion, style of communication within the company, etc.

Our company values (DOPE) guide the conduct of Argenta employees and form a key component of our culture. They offer a basis for making decisions at an operational, tactical as well as strategic level. They are used as a touchstone for each person’s actions and set out in concrete terms what customers may expect

from us and what we may expect from each other. We attach importance to fair and transparent sales methods – with focus clearly placed on the customer – and to a no-nonsense culture. We therefore promote integrity throughout the organisation, at all levels.



Close at hand: respecting each other’s opinions, sharing knowledge and experiences, being honest with each other and entering into long-term relationships in which there is no room for self-interest. Our attention is always focused on the customer, to ensure excellent service.

Enterprising: with employees taking action themselves to achieve the set goals and, when they detect opportunities somewhere, going for them.

Pragmatic: with employees heading straight to the target, without detours. A good solution does not have to be unnecessarily difficult.

Simplicity: with employees communicating with each other in clear language. Focus is placed on the essence. They work carefully on simple solutions, making sure things are not unnecessarily complicated.

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Promoting and monitoring our corporate culture

Argenta wants to convey and promote its corporate culture from the very start of its employees’ careers. During the recruitment process, we check whether there is a match with our DOPE values in the initial interviews. Only once they are found to be a match can an employee start working for us.

And throughout their careers, we find transparency essential for enhancing integrity and fostering our company values. We therefore actively encourage an open organisational culture in which staff feel free and safe to point to practices that violate integrity and business ethics, and to appreciate good examples. We expect all employees to give each other feedback and to be open to feedback themselves. And what if an employee notices a breach of our business ethics? Then we expect that employee to report the breach, irrespective of whether it is the employee themselves, a customer, another employee or an external party who committed the breach.

Finally, managers play a vital role in promoting our culture and conveying our values. DOPE values are therefore a key ingredient within the scope of team development and leadership training, and are explicitly addressed in feedback discussions with employees.



On a yearly basis, we evaluate our culture and the extent to which our company values are recognised. Until 2023, we conducted the Employee Opinion Survey to evaluate our corporate culture. In 2024, we continued asking these questions, but in the form of a culture scan. This culture scan enables us to chart how employees experience the culture. The results are then also examined by the Executive Committee, in cooperation with Organisation & Talent, to determine any actions that further promote our culture.

The necessary actions and checks are set out in Argenta’s governance model. The first line encompasses the propositions and supporting services; they are responsible for daily risk management and must fulfil obligations set out in our Governance Memorandum and charters. Within the second line, Compliance and the risk functions are responsible for maintaining an overview and for monitoring the policies to ensure we are compliant with the applicable regulations and legislation. They track any breaches and incidents and report on them to the Executive Committee. Lastly, the third line is responsible for carrying out independent audits of the organisation, internal controls and governance processes. They report to the Audit Committee.

Infringements of policy

Any breach must be reported – regardless of whether the breach was incurred by the employee themselves, a customer, another employee or an external party. It is important that breaches are reported so that we can take the necessary measures to ensure that damage remains limited and that similar incidents are not repeated in the future.

Breaches can come to light in three different ways:

- First or second line controls and investigations
- Internal reports from employees
- Complaints from customers

Breaches are reported to the manager and to the Compliance department. If an employee is aware of a conflict of interest but deliberately does not report it, that is considered to be neglect on their part. What if the employee does not want or is unable to report the breach via the hierarchical channel described above? Then they can make use of the whistleblowers’ scheme. The anonymity of the whistleblower is always guaranteed.

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An investigation is carried out depending on the nature and gravity of the suspected breach. Investigations can take on different forms:

- Investigations are carried out within the defined framework of the investigation methodology adopted by the Monitoring & Investigation team of Compliance and NFRM.
- Ad-hoc investigations are also carried out.
- The inspection team of NFRM identifies and investigates breaches of business ethics at branches. The investigation is monitored by a multidisciplinary task force and presented to the Sanctions Committee (composed of members of senior management) for their assessment.
- Compliance investigates (apparent) conflicts of interest. Where necessary, they also recommend mitigating measures. Identified conflicts of interest are recorded in a register. Hypothetical (potential) conflicts of interest are entered in the inventory of conflicts of interest.
- Customer service investigates complaints from customers. Where necessary, action is taken in-house. An external complaint from a customer and queries or comments from regulators may indicate that an investigation needs to be carried out in-house to see whether breaches of legal provisions or Argenta's rules of conduct have been committed.
- The head of Internal Audit investigates reports from whistleblowers in complete discretion. The anonymity of the whistleblower is guaranteed, if they so wish. In this way, Argenta wants, at all times, to offer protection, ensure the independence of the investigation and avoid conflicts of interest. For more information on the whistleblowers' scheme, please see Whistleblowers' scheme.

Recommendations can be made if any violations are detected. NFRM Advisory and Compliance Advisory can then recommend taking specific actions, such as escalating the matter or presenting the issue to senior management. In the event of serious violations in respect of head office employees, the Organisation & Talent department will also be involved and disciplinary measures may be taken.

Whistleblowers' scheme

Argenta wants to make it as easy as possible for its employees to submit an in-house report raising legitimate concerns in good faith. By this, we mean concerns of significant breaches of the company values and codes, or of unethical or illegal conduct in connection with aspects falling under the authority and supervision of Argenta. We have set up specific channels to facilitate such

reporting, for instance a whistleblowers' scheme.

A whistleblowers' scheme ensures that (attempts at) illegal, immoral or non-legitimate practices that are under Argenta's control come to light. It provides staff with a channel to report observations of (what appear to be) irregularities within the company, while guaranteeing their anonymity and without having to follow the hierarchical path. Suppliers and customers also have access to channels to report unethical behaviour.

Employees can submit a report under the whistleblowers' scheme in writing (via e-mail). Their anonymity is 100% guaranteed. In this way, bona fide whistleblowers are legally protected from direct or indirect disciplinary measures or decisions with similar effect. The only person to know the identity of the whistleblower is the contact person appointed by Argenta to carry out an independent investigation.

The contact person is authorised to carry out an independent investigation, perform all investigative acts and consult all sources necessary as part of the investigation. Where considered necessary by the contact person, they may call upon an internal or external party to perform the necessary investigative acts. The maximum time for carrying out an investigation (including feedback and conclusion) is three months. The findings and conclusions are presented in a report to the Executive Committee. The Executive Committee then decides on the measures to be taken.

In 2024, two reports were submitted under the whistleblowers' scheme. Both were found to be inadmissible.

Argenta employees can find all the requisite information on the whistleblowers' scheme on the intranet. They are also informed of the existence of the scheme and how it works via Compliance training.

Further information on the whistleblowers' scheme is included in the procedure on running a whistleblowers' scheme.

Training

Argenta organises mandatory training on the various aspects of the integrity policy, codes of conduct, anti-corruption and conflicts of interest.

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By doing so, we increase awareness of the ethical standards among all employees and branches.

Employees and managers receive regular digital updates of the most important standards and of new rules and risks affecting integrity. In concrete terms, they cover topics such as privacy, anti-corruption, conflicts of interest and market abuse.

The training consists of six modules:

- An introductory module
- Personal integrity
- Market integrity
- Conflicts of interest
- Tax prevention policy
- Duties of care

All head office employees and managers are required to complete the integrity programme. Each module must be repeated every three years. Mandatory training is also organised on AML, privacy, cyber security and fraud. We also shed light on important matters on a thematic basis in awareness campaigns. For example, non-discrimination (2023), gifts and donations (2024), conflicts of interest (2024).



Awareness campaign on gifts and donations.

We monitor whether everyone takes part in the training. If this is not the case, we take appropriate action in accordance with the general sanctions framework. The training is frequently adjusted and undergoes regular certification.



In 2024, a survey on integrity was carried out to sound out the extent to which employees are familiar with the corporate values and Integrity Charter.

Prevention and detection of corruption and bribery

Introduction

Argenta has a zero tolerance policy towards corruption and bribery. That applies not only internally to employees but also externally to cooperation with our customers and external partners. All Argenta’s employees can potentially be exposed to corruption and bribery. Argenta has implemented preventative measures and set up a control environment designed to prevent involvement in corruption and bribery.

Preventative measures: policy and training

Argenta considers it crucially important for all employees to comply closely with the standards on integrity. No specific functions or groups have been identified as being at higher risk.²⁷ Argenta boasts a robust framework of policy documents, such as: the Governance Memorandum; the Integrity Charter; the AML & Sanctions Policy; the Conflict of Interest Policy; the Tax Prevention Policy; the Market Abuse Policy; the Pay Policy for non-directors; the Fraud Procedure; etc.

²⁷In 2024, Argenta reported all in-house employees in a higher-risk function, in order to meet the reporting requirement.



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To make employees aware of the conduct expected of them, Argenta has developed an extensive range of mandatory training for them to attend, such as the integrity programme (six training modules), training on AML, Sanctions & Embargoes, training on fraud, etc. The modules on personal integrity and conflicts of interest under the integrity training programme focus on:

- The risks of corruption
- Identifying situations in which one can be deceived into being compromised
- The conduct prescribed in order to prevent (the appearance of) corruption and bribery

Table: an overview of the executive and non-executive directors, senior managers and employees who have completed at least 1 of the mandatory 8 modules in 2024 and the total number of training hours across these 8 modules. The mandatory modules must be attended every three years and completed with a certificate.	
Number of executive and non-executive (across all committees)	16
Number of executive and non-executive who completed at least 1 training in 2024	11
Total hours in 2024	20.5
Percentage of executive and non-executive who completed at least 1 training in 2024	69%
Number of senior managers (DC-1) 31.12.2024	29
Number of senior managers who completed at least 1 training in 2024	25
Total hours in 2024	54.5
Percentage of senior managers who completed at least 1 training in 2024	86%
Number of in-house employees as at 31.12.2024	1,250
Number of employees who completed at least 1 training in 2024	1,086
Total hours in 2024	2,764
Percentage of employees who completed at least 1 training in 2024	87 %

Conflicts of interest

The conflict of interest policy relates to all services and all staff and commercial agents of Argenta.

Staff have a duty to immediately disclose any actual or apparent conflict of interest internally. In certain cases, a conflict of interest has to be reported to Compliance, for example if the conflict of interest is a breach of existing measures or if the

conflict cannot be contained. Potential conflicts of interest are identified in an inventory of conflicts of interest. The actual conflicts of interest are recorded in the conflicts of interest register and managed by Compliance.

Gifts and invitations

Two codes of conduct govern the receipt or giving of gifts and invitations (one applicable for the branch network and one for the head office), setting out rules for the acceptance or refusal of gifts and invitations based on concrete examples. There is an a priori duty to notify one’s manager and/or Compliance in the case of gifts and invitations. Within the scope of notifications of gifts, Compliance has recommended in many dossiers that Argenta employees should not get involved in the giving or receipt of gifts or donations that might (appear to) hinder the objective and independent performance of their work.

Dilemmas in the receipt and giving of gifts and invitations are handled in the module on conflicts of interest in the integrity training programme. Employees are also regularly made aware of this subject via awareness campaigns.

Sideline activities

Key individuals and members of the Board of Directors are potentially vulnerable to the risk of corruption and bribery, which is why Argenta carries out strict controls on such persons, including checks on sideline activities performed. However, for sideline activities as well, head office employees and branch managers of the independent branch network are expected to strictly comply with the rules on proactive reporting and assessment of sideline activities.

Recorded conflicts of interest

In 2024, a total of 46 conflicts of interest were recorded in the conflict of interest register. In 22% of the cases, the conflicts of interest concerned employees from the branch network and in 59% of the cases, they involved head office employees. The remaining 19% related to directors, consultants, suppliers or intra-Group conflicts of interest. The most common categories under which conflicts of interest were recorded are:

- Exercising more than one mandate (sideline functions) (41%);
- Receiving gifts, invitations or other benefits (26%);
- A personal or professional relationship with another party (24%).

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Anti Money Laundering

Laundering practices and terrorism financing can undermine the sustainability of Argenta and the society. In the AML/CFT²⁸ Sanctions & Embargoes policy, Argenta declares its zero tolerance of the risk of money laundering and terrorism financing. The policy describes how Argenta is combating money-laundering practices without categorically excluding sectors or groups (de-risking).

Customers are screened to determine whether they are or have been related to a politically prominent person and, where necessary, a higher-risk customer profile is created for them, and more stringent (transaction) monitoring is carried out on them. Suspected instances of money laundering (including serious tax fraud) and terrorism financing are reported to the competent authorities.

Argenta never sets up structures, mechanisms or services that commit tax fraud or that Argenta knew or should have known were being used to commit tax fraud. Argenta is not involved in setting up, supporting or implementing structures that can hamper fiscal transparency (special mechanisms).

Reporting of offences and sanctions

Suspected bribery and corruption offences by branches are investigated by the inspection service. Identified offences are discussed in a task force with representatives from the first and second line. The task force decides whether the dossier is to be presented to the Sanctions Committee, composed of members of senior management. The Sanctions Committee decides whether or not to impose a sanction. The Sanctions Committee is independent from the management area being investigated. In 2024, no sanctions in connection with bribery and corruption were imposed by the Sanctions Committee.

Possible incidents are reported to the administrative, managerial and supervisory bodies via the standard reporting lines and reports. For instance, the annual Compliance report, the annual report of the AMLCO, fraud reports, etc. Twice a year, Compliance provides an overview of the potential and actual intra-Group conflicts of interest to the Group Supervisory Committee, set up within the Board of Directors.

In 2024, Compliance did not identify any incidents in the area of bribery or corruption, and Argenta did not receive any convictions or (administrative) fines in connection with corruption and bribery.

²⁸AML/CFT = anti-money laundering / combating the financing of terrorism



Investing responsibly and locally

As a financial institution, we can make a difference through the cash flows we manage for our customers. Each and every day, we opt to deploy these flows responsibly. There is no room for unethical investments in our investment funds. We translate this into the sustainable investment product range. Finally, we use our own investment portfolio to invest in tangible and local projects.

Investing responsibly

Material impact

In the current geopolitical context, growing attention is paid to the investments made by financial institutions and the negative impact such investments may be associated with. More specifically, this means investments in companies from controversial sectors or companies who are criticised for controversial activities.

Investing in such companies can run counter to the targets of the SDGs (Sustainable Development Goals), the Paris climate agreement, or the Green Deal among other commitments. It can cause a broad negative impact on society in terms of the environment and people. Fund managers managing their customers’ funds can also generate a negative impact in respect of their customers who are unable to identify with the respective investment policy.



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Strategy and policy

To avoid and restrict its negative impact to the greatest extent possible, Argenta adopts an exclusion policy applicable to all entities of the Argenta Group. Argenta does not want to invest in companies that base their revenue or business models on unsustainable activities, nor in companies that are criticised for serious violations of ethical standards.

For example, we do not invest in companies involved in controversial weapons, such as land mines, nuclear weapons and chemical weapons. We do not invest in companies involved in other harmful activities, such as animal testing, civilian firearms, gambling or controversies in the (living) environment, HR, human rights, social involvement, general corporate behaviour and organisational structure. We do not invest in companies from the energy sector, for example companies which extract and process coal, oil and gas. This important principle is embedded in the sustainable investment policy of the various entities.

Another key anchor point of responsible investment focuses on promoting positive impact via a sustainable product range (see below). In this respect, Argenta is guided by the European Regulation on sustainable investment (the SFDR), which distinguishes three important fund categories:

- Article 6: funds which do not promote any ecological or social characteristics or have no sustainable investment objective;
- Article 8: funds which promote ecological or social characteristics;
- Article 9: funds with a sustainable investment objective.

Thanks to this European Regulation, the rules on sustainable investment are clear to everyone. It helps investors to be aware of the sustainable impact they can make. Investors can make targeted choices better because of the strict transparency rules.

Targets and actions

Avoiding negative impact

The exclusion policy is adopted by all entities of the Argenta Group. Every six months, we draw up exclusion lists and monitor them in line with the principles of the exclusion policy.

Promoting positive impact

We want to generate as much of a positive impact as possible:

- All investment solutions that Argenta offers its customers are sustainable in accordance with Article 8 or 9 under the Sustainable Finance Disclosure Regulation. We do not offer any Article 6 (not sustainable) funds
 - We invest at least 10% of funds in green, social or sustainable debt instruments (bonds) via the investment portfolios of Aspa and Aras
 - We make our voice heard in the companies in which we invest via a proxy voting partner, which enables us to make an impact on decisions about environmental and social topics and governance.

For our Article 8 funds, we opt to increase the positive impact even further by putting in place an additional threshold of at least 20% sustainable investment objectives, on top of our classic ‘best in class’ approach.

With sustainable objectives, we aim to make an effective and quantifiable positive contribution to:

- The realisation of the United Nations’ Sustainable Development Goals (SDGs).
- The ecologically sustainable activities defined by the European Taxonomy. This European Regulation helps investors to determine which investments make a positive contribution to issues such as the mitigation, prevention or limitation of the consequences of climate change, the protection and restoration of biodiversity, the sustainable use and protection of water and marine resources, the transition to a circular economy and the prevention and control of pollution.

Article 9 funds set the bar even higher. At least 80% has to be invested in sustainable companies. The remaining 20% relates to the non-capitalised assets in the fund, particularly cash and cash equivalents.

To be in a position to offer Article 8 or 9 funds, we apply a strategy in which we try to limit the negative impact of our investments to the maximum. We do this by working with a strict exclusion list of controversial and unethical companies in which no investments may be made. In addition, we do not invest in (bonds from) countries which are subject to European sanctions or appear on international exclusion lists.

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Results in 2024

- In 2024, no less than EUR 14.5 billion was invested in corporate and government instruments via the Article 8 funds of AAM. We invested EUR 4.6 billion through the Article 8 funds of Arvestar. The branch 21 products of Aras (Argenta Life Plan and Argenta Flexx) are also classified as Article 8 funds. Reserves as at the end of 2024 are EUR 2.48 billion.
- We manage no less than EUR 968 million through the Article 9 funds of AAM.
- We invest EUR 234 million in green bonds via the funds of AAM and EUR 189 million via the funds of Arvestar. We invested EUR 240 and 46 million via the investment portfolios of Aspa and Aras, respectively.
- For the funds of AAM, we voted for a total of 641 companies at 1,843 general meetings in 2024. For the investments under Aras, we voted for 21 companies at 30 general meetings, while for the investments under Aspa, we voted for a total of 6 companies at 10 general meetings. For the funds of Arvestar, we voted for 111 companies at 126 general meetings.
- We also invested in the fast-growing sustainable bonds market in 2024. Around 12% of Aspa’s total portfolio of debt instruments fits into a green, social or sustainable investment framework. In the same period, we invested EUR 46 million in sustainable bonds at Aras. That brings the share of sustainable bonds to 12% of Aras’s total portfolio.



Sustainable investment product range
Material impact, risks and opportunities

By offering a sustainable investment product range, Argenta can make a positive impact on its customers as well as broadly on society, because we are investing in sustainable products. We avoid negative impact by not investing in controversial or disputed activities. Our exclusion policy completely excludes investments in activities such as controversial weapons or coal mining. Companies involved in controversies are also excluded by Argenta’s investable universe.

Without adopting such policies, Argenta could create a negative impact on people and the environment, for example if investments are nevertheless made in unethical companies and no consideration is given to the negative effects of our investments.

Argenta also identifies risks associated with climate change, hence the importance, in terms of climate mitigation, of phasing out investments in coal-intensive sectors from our investment portfolios. For further information on the risks and opportunities associated with climate change, see [here](#).

Finally, Argenta also identifies opportunities. Because we opt to offer all our funds in a sustainable way, we are positioning ourselves as a credible and sustainable banker-insurer. This can also contribute to customer satisfaction, because customers are satisfied with the way in which their funds are managed. The sustainable investment product range offered by Argenta falls under the Customer Relevance strategic pillar.

Strategy and policy

Customers invest in one of the five Argenta core funds, in line with their risk profile and personal characteristics. Argenta is fully committed to offering investment funds that are sustainable in accordance with the European SFDR regulation on sustainability:

- All our investment funds comply with a strict exclusion list of controversial and unethical companies in which no investments may be made.
- The core funds focus on long-term themes within a sustainable framework.
- Customers can also opt for sustainable accent funds – the Argenta “responsible funds”.
- Argenta uses the legal reporting framework, as defined by the Sustainable Finance Disclosure Regulation (SFDR). This standardised framework enables

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customers to evaluate and assess the sustainability policy of financial institutions, so that they can make informed choices.

The sustainable investment product range is based on responsible investment principles embedded in the investment policy of the fund managers:

AAM investment policy

AAM is responsible for managing Argenta Fund and Argenta Portfolio. The task of determining the actual investment strategy and translating that into the actual positioning in the portfolio, including sustainability characteristics, falls under the responsibility of the management committee of AAM (made up of all fund managers together with risk and operational experts of AAM). Under the allocation committee, focus is placed on asset allocation, which involves determining the macroeconomic investment vision, which is then reflected in a macroeconomic dashboard. The dashboard determines the optimum desired positioning, both at asset class level (shares, bonds or cash) and subasset class level (geographical regions, sectors, themes, terms, creditworthiness, etc.).

The sustainable investment policy of AAM sets out the core principles of the policy. On the one hand, we adopt a strict exclusion policy in respect of non-sustainable projects, while on the other, we make a positive impact by investing in sustainable projects and projects of social relevance.

The [sustainable investment policy](#) of AAM can be accessed via Argenta’s website. On the same page, you can also find the requisite information on the [pay policy](#), the [Principal Adverse Impact principle](#) (or PAI), the strategy when exercising voting rights and commitment, or [proxy voting](#).

Arvestar investment policy

Arvestar, a joint venture of AAM and Degroof Petercam Asset Management (DPAM) is responsible for managing Argenta Pension Fund (ARPE), Argenta Pension Fund Defensive (ARPE Defensive), Argenta DP Dynamic Allocation and Argenta DP Defensive Allocation.



DPAM acts as the investment manager of Arvestar. The Responsible Investment Steering Group (RISG) reflects on ESG challenges by promoting responsible investment, spreading knowledge on ESG and developing Responsible Investing (RI) & ESG expertise internally and externally. The Responsible Investment Competence Centre (RICC) supports all initiatives, methodologies and projects relating to the ESG aspects of the investment processes. The buy-side research analyst team is responsible for integrating indicators of sustainable and responsible investment in all buy-side investment cases (top-down and/or bottom-up).

The principles of the exclusion policy are embedded in the sustainable investment policy. The [sustainable investment policy](#) of Arvestar can be accessed via Argenta’s website. On the same page, you can also find the requisite information on the [pay policy](#), the [Principal Adverse Impact principle](#) (or PAI), the strategy when exercising voting rights and commitment, or [proxy voting](#).

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Arvestar investment policy

Aras is the insurance company within the Argenta Group and is responsible for managing the branch 21 investment portfolio among other activities. The financial policy of Aras is set out in a financial risk policy and related standards. The policy determines the internal governance framework within which investment and management decisions are made in line with the approved risk appetite and business strategy, while ensuring that risks are adequately monitored. The internal governance framework is based on (i) an appropriate committee and consultation structure, (ii) an internal control environment organised in accordance with the principle of 3 lines of defence, and (iii) suitable decision governance for each of Aras’s activities.

The principles of the exclusion policy are embedded in the [sustainable investment policy](#). The sustainable investment policy of Aras can be accessed via Argenta’s website. On the same page, you can also find the requisite information on the [pay policy](#), the [Principal Adverse Impact principle](#) (or PAI), the strategy when exercising voting rights and engagement, or [proxy voting](#).

- Argenta Spaarbank and Argenta Assuranties provide investment and insurance advice to retail customers:
- Aspa gives customised recommendations to customers with respect to financial instruments (investment advice). The policy on integrating sustainability risks in investment advice can be accessed [here](#).
 - Aras gives customised recommendations to customers with respect to insurance products (insurance advice). The policy on integrating sustainability risks in investment advice can be accessed [here](#).

Argenta’s policy on climate change can be accessed [here](#).
Argenta’s policy with respect to customers is provided [here](#).

- We also instil simplicity into our investment product range. In concrete terms, this means that we:
- Offer a clear and simple investment product range
 - Explain in simple terms what investment means
 - Make investing understandable and accessible

Targets and actions

The targets and actions are described in the section on [investing responsibly](#).

Investing locally

Material impact

As a locally anchored family bank, we make a significant social impact on our immediate environment. We invest, figuratively speaking, in our customers’ backyard.

Strategy and policy

Via the investment portfolios of Aspa and Aras, Argenta invests a large share of the money from its customers’ savings and payment accounts in loans to and bonds issued by local government institutions, such as cities and municipalities, or in local infrastructure projects.

The framework within which Argenta invests is determined by the financial risk policy and related standards.

Targets and actions

Argenta has already invested more than EUR 1 billion in the local economy through the bank’s and insurance company’s investment portfolios. These investments help to breathe financial life into projects in public welfare, social housing, water treatment, care for the elderly, student housing, facilities for people with disabilities, green energy projects and more.

In 2024, the bank invested EUR 90 million in social housing and a sludge processing plant, among other projects.

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Taxonomy reporting

The EU Taxonomy (Regulation (EU) 2020/852) is part of the European Green Deal and has been designed to facilitate the transition to a sustainable economy. The legal framework provides for a classification system for sustainable economic activities and lays down a number of obligations for relevant information provision in this regard.

Under the EU Taxonomy, economic activities can be sustainable subject to six environmental objectives:

- Climate change mitigation (CCM);
- Climate change adaptation (CCA);
- The sustainable use and protection of water and marine resources (WTR);
- The transition to a circular economy (CE);
- Pollution prevention and control (PPC);
- The protection and restoration of biodiversity and ecosystems (BIO).

A distinction is made between taxonomy-eligible and taxonomy-aligned activities. Activities that can be regarded as sustainable are taxonomy-eligible. Taxonomy-eligible activities are then marked as taxonomy-aligned if the activity makes a substantial contribution to at least one of the objectives, causes no harm to any other objective (do no significant harm or DNSH) and also satisfies minimum social safeguards. The conditions for a substantial contribution and DNSH are laid down in technical screening criteria for each activity and environmental objective.

As of this year, Argenta can report on eligibility and alignment for the six environmental objectives.

The Disclosures Delegated Act includes specific reporting templates and associated guidelines for non-financial undertakings (Annex II), asset managers (Annex IV), credit institutions (Annex VI), investment firms (Annex VIII) and insurance and reinsurance undertakings (Annex X).

Regulation (EU) 2022/1214, which attaches additional reporting requirements to the Disclosures Delegated Act for exposures to nuclear energy and fossil gas related activities (Annex XII), was adopted in 2022.



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The reporting must be done on a consolidated basis. However, in view of the composition and nature of the activities conducted within the Argenta Bank- en Verzekeringsgroep, the reporting will be split into Argenta as a credit institution, Argenta as an insurance company and Argenta as an asset manager. The shared and specific requirements for financial activities are explained in the next section, followed by separate sections with the respective reporting templates for Argenta Spaarbank, Argenta Assuranties and the asset management activities.

The Argenta approach

In 2023, working groups were set up at Argenta to interpret the requirements under the EU Taxonomy and integrate them into the existing reporting processes. The main considerations are explained below.

General principles

Article 7 of the Disclosures Delegated Act lays down a number of principles that financial undertakings must take into account when calculating the Taxonomy KPIs.

- In accordance with Article 7(1), exposures to central governments, central banks and supranational issuers are excluded from the numerator and denominator when calculating the Taxonomy KPIs
- Article 7(2) states that derivatives must be excluded from the numerator of the KPIs
- Article 7(3) states that exposures to undertakings that are not subject to the Non-Financial Reporting Directive (hereinafter NFRD) must be excluded from the numerator of the KPIs

Alignment with strategy and business approach

Argenta wants to contribute to the transition to a sustainable, climate-neutral society by accelerating its sustainability strategy and integrating sustainability into its product range. For example, Argenta offers specific discounts for purchasing or renovating sustainable homes. Further information about our sustainability strategy can be found under [climate strategy](#).

The Taxonomy reporting supports Argenta’s sustainability strategy in two main areas. As regards risk management, the KPIs resulting from the Taxonomy report allow Argenta to further identify and manage climate-related transition risks in the investment portfolio. At the same time, the technical screening criteria laid down in the Taxonomy serve as an additional benchmark to verify and align our

own criteria for sustainable mortgage loans and car loans to customers. And finally, in 2025, Argenta will continue to look at how Taxonomy can be integrated into the Green Bond Framework.

As a financial institution active in mortgage loans, lending and asset management, the following consolidated KPIs are applicable:

Taxonomy KPIs 31/12/2024	Turnover-based	CapEx-based
Bank - GAR	12.43%	12.61%
Insurance - Consolidated	4.28%	4.79%
Insurance - Underwriting	0.00%	
Insurance - Investments	6.17%	6.91%
Asset management - GIR	1.77%	2.16%
Consolidated KPI	10.55%	10.78%



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Summary of the methodology used for each type of exposure		
Counterparty	Methodology	Data limitations
Financial and non-financial undertakings	The Taxonomy KPIs relating to financial and non-financial undertakings are based on the most recent reported figures of counterparties. Argenta works with an external data provider (Moody’s ESG Solutions) which provides Taxonomy screening services for this purpose.	To gain a good idea of the quality of the acquired data, Argenta is in close contact with the external data pro-vider regarding the sources, the processes and the meth-odology for producing the data.
Households	<p>Exposures to households, in the form of mortgage loans and instalment loans, are an important component of the balance sheet. These assets represent the greatest part of Argenta’s taxonomy-eligible and taxonomy-aligned as-sets.</p> <p>Mortgage loans for the pur-chase and construction of homes are assessed on the basis of both internal and external data against the technical screening criteria under the climate change mitigation (CCM) objective.</p> <p>The substantial contribution criteria are assessed on the basis of the year of construction²⁹ and the energy perfor-mance certificates of the properties funded. Homes with planning consent before 31 December 2020 and an official, valid EPC A make a substantial contribution to CCM. The top 15% option was also applied to the Bel-gian mortgage portfolio on the basis of the 159 kWh/m² threshold accepted at sector level. The NZEB threshold of 30 kWh/m² for ground-level homes and 50 kWh/m² for non-ground-level homes was applied to homes in the Dutch mortgage portfolio with planning consent after 31 December 2020.³⁰</p> <p>For the assessment of DNSH, loans for properties that are sensitive to acute and chron-ic flooding risks, as reported under Pillar 3, were regarded as not taxonomy-aligned.</p> <p>Renovation loans and car loans from 1 January 2020 are reported as taxonomy-eligible.</p> <p>To assess minimum social safeguards, a general analy-sis was carried out of social legislation in Belgium and the Netherlands, where Argen-ta’s mortgage portfolios are located. Social protection is stringently regulated and monitored in both countries, alongside national initiatives to promote and ensure this protection. Building on this knowledge and the principles of the Taxonomy Regulation, Argenta has decided to in-clude households under the alignment results as at 31 December 2024.</p>	<p>Homes in the Belgian mortgage portfolio with planning consent after 31 December 2020 are regarded as not taxonomy-aligned, given the NZEB threshold in Belgium has not been clearly determined in kWh/m².</p> <p>As of 31 December 2024, the technical screening criteria for car loans and renovation loans cannot be assessed because of a lack of information. Argenta will make further efforts to collect the data needed for this.</p>
Local governments	Exposures to local govern-ments are considered as not eligible and not aligned. Ar-genta only has general loans to local governments. All these exposures are un-known use of proceeds.	Local governments do not report under the EU Taxonomy.

EU Taxonomy reporting templates
Argenta Spaarbank
The reporting templates for Argenta Spaarbank are shown below in accordance with Annexes V and VI of the Disclosures Delegated Act. The reporting scope is based on the prudential reporting.

²⁹In the Draft Commission Notice for the Climate Delegated Act published by the European Commission on 19 December 2022, it is stated that the difference between buildings from before and after 31 December 2020 must be made on the basis of the date of planning consent. Given the date of planning consent is not available today, it is derived on the basis of the property's year of construction.
³⁰In accordance with the Dutch Energy Efficient Mortgage Framework (DEEMF) guidelines.



0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets	KPI****	KPI*****	% 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)
	CODE	a	b	c	d	e	f
Main KPI	Green asset ratio (GAR) stock	1	6.388,55	0,12	0,13	0,9149	0,0651

		Total environmentally sustainable activities	KPI	KPI	% 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)
	CODE	a	b	c	d	e	f
Additional KPIs	GAR (flow)	2	839,38	0,14	0,14	0,9517	0,0639
	Trading book*	3					
	Financial guarantees	4					
	Assets under management	5	292,31	0,02	0,02		
	Fees and commissions income**	6					

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

**Fees and commissions income from services other than lending and AuM Instutitons shall dislclose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI over banks’ total assets

****based on the Turnover KPI of the counterparty

*****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Note 1: Across the reporting templates: cells shaded in black should not be reported.

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs’inclusion in these KPI will only apply subject to a positive result of an impact assessment.



1.Assets for the calculation of GAR - Turnover

Million EUR		Disclosure reference date T																														
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy- eligible)	Of which environmentally sustainable (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	
CODE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
GAR - Covered assets in both numerator and denominator																																
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1	47.735,39	41.332,54	6.379,78		8,20	324,04	102,72	0,35		0,31	6,50	5,92		0,03	59,45	1,99		1,34	95,49	0,51		79,82				41.676,52	6.388,55		8,20	325,72	
Financial undertakings	2	3.346,70	897,51	107,88		6,69	26,08	101,51	0,04							9,50											1.008,52	107,91		6,69	26,08	
Credit institutions	3	2.405,91	642,46	51,75		2,09	1,11	97,22	0,04																		739,67	51,79		2,09	1,11	
Loans and advances	4																															
Debt securities, including UoP	5	2.405,91	642,46	51,75		2,09	1,11	97,22	0,04																		739,67	51,79		2,09	1,11	
Equity instruments	6																															
Other financial corporations	7	940,79	255,05	56,13		4,60	24,98	4,30								9,50											268,85	56,13		4,60	24,98	
of which investment firms	8																															
Loans and advances	9																															
Debt securities, including UoP	10																															
Equity instruments	11																															
of which management companies	12																															
Loans and advances	13																															
Debt securities, including UoP	14																															
Equity instruments	15																															
of which insurance undertakings	16	21,12						1,93																				1,93				
Loans and advances	17																															
Debt securities, including UoP	18	21,12						1,93																				1,93				
Equity instruments	19																															
Non-financial undertakings	20	2.430,25	683,75	383,08		1,51	297,96	1,20	0,31		0,31	6,50	5,92		0,03	49,96	1,99		1,34	95,49	0,51		79,82			916,72	391,81		1,51	299,64		
Loans and advances	21	159,25	31,27	17,58			17,58	0,27	0,27		0,27	0,00				2,79				1,34	95,49	0,51		79,82		0,01	34,35	17,85			17,85	
Debt securities, including UoP	22	2.270,99	652,48	365,50		1,51	280,38	0,93	0,04		0,04	6,50	5,92		0,03	47,16	1,99		1,34	95,49	0,51		79,80			882,37	373,96		1,51	281,79		
Equity instruments	23																															
Households	24	41.660,59	39.751,28	5.888,83	5.888,83																											
of which loans collateralised by residential immovable property	25	40.487,60	39.165,97	5.888,83	5.888,83																											
of which building renovation loans	26	1.529,29	1.529,29																													
of which motor vehicle loans	27	212,21	212,19																													
Local governments financing	28	297,85																														
Housing financing	29																															
Other local governments financing	30	297,85																														
Collateral obtained by taking possession: residential and commercial immovable properties	31																															
Assets excluded from the numerator for GAR calculation (covered in the denominator)	32	3.654,83																														
Financial and Non-financial undertakings	33	2.449,22																														
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34	2.217,06																														
Loans and advances	35	869,31																														
of which loans collateralised by commercial immovable property	36	43,72																														
of which building renovation loans	37	12,17																														
Debt securities	38	1.341,26																														
Equity instruments	39	6,48																														
Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	40	232,16																														
Loans and advances	41																															
Debt securities	42	232,16																														
Equity instruments	43																															
Derivatives	44	267,00																														
On demand interbank loans	45	142,98																														
Cash and cash-related assets	46	66,24																								</						

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collateral obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure



1.Assets for the calculation of GAR - Turnover

Million EUR		Disclosure reference date T-1																																			
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)					Circular economy (CE)					Pollution (PPC)					Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	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					
CODE	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk						
GAR - Covered assets in both numerator and denominator																																					
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1	45.696,96	38.226,08	5.344,18		6,09	309,84	177,76	0,32		0,32															38.755,11	5.344,49		6,09		310,16						
Financial undertakings	2	3.405,35	123,06	23,23		5,58	9,24	176,42																		299,47	23,23		5,58		9,24						
Credit institutions	3	2.570,43						164,76																		164,76											
Loans and advances	4																																				
Debt securities, including UoP	5	2.570,43						164,76																		164,76											
Equity instruments	6																																				
Other financial corporations	7	834,93	123,06	23,23		5,58	9,24	11,66																		134,71	23,23		5,58		9,24						
of which investment firms	8																																				
Loans and advances	9																																				
Debt securities, including UoP	10																																				
Equity instruments	11																																				
of which management companies	12	1,53																																			
Loans and advances	13																																				
Debt securities, including UoP	14	1,53																																			
Equity instruments	15																																				
of which insurance undertakings	16	20,83						1,93																		1,93											
Loans and advances	17																																				
Debt securities, including UoP	18	20,83						1,93																		1,93											
Equity instruments	19																																				
Non-financial undertakings	20	2.695,10	736,16	346,45		0,51	300,60	1,34	0,32		0,32															737,50	346,76		0,51		300,91						
Loans and advances	21	183,59	30,97	5,17			5,17	0,28	0,28		0,28															31,25	5,46				5,46						
Debt securities, including UoP	22	2.511,51	705,20	341,27		0,51	295,42	1,06	0,04		0,04															706,25	341,31		0,51		295,46						
Equity instruments	23																																				
Households	24	39.596,51	37.366,86	4.974,50																						37.718,14	4.974,50										
of which loans collateralised by residential immovable property	25	38.557,00	36.087,39	4.974,50																						36.087,39	4.974,50										
of which building renovation loans	26	1.095,02	1.095,02																							1.095,02											
of which motor vehicle loans	27	195,49	184,45																							184,45											
Local governments financing	28																																				
Housing financing	29																																				
Other local governments financing	30																																				
Collateral obtained by taking possession: residential and commercial immovable properties	31																																				
Assets excluded from the numerator for GAR calculation (covered in the denominator)	32	3.822,38																																			
Financial and Non-financial undertakings	33	2.570,14																																			
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34	2.286,10																																			
Loans and advances	35	897,23																																			
of which loans collateralised by commercial immovable property	36	40,94																																			
of which building renovation loans	37	2,61																																			
Debt securities	38	1.380,59																																			
Equity instruments	39	8,28																																			
Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	40	284,04																																			
Loans and advances	41																																				
Debt securities	42	284,04																																			
Equity instruments	43																																				
Derivatives	44	242,67																																			
On demand interbank loans	45	201,54																																			
Cash and cash-related assets	46	62,60																																			
Other assets (e.g. Goodwill, commodities etc.)	47	745,43																																			
Total GAR assets	48	49.519,34	38.226,08	5.344,18		6,09	309,84	177,76	0,32		0,32		</																								

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collateral obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-E

1.Assets for the calculation of GAR - CapEx

Million EUR		Disclosure reference date T																															
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	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					
CODE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af		
GAR - Covered assets in both numerator and denominator																																	
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1	47,735.39	41,469.75	6,477.40		35.53	299.00	3.00	0.11		0.06	0.23	0.09		0.01	38.26	1.06		0.51	92.62	1.01		33.51				41,637.37	6,479.67		35.53	299.59		
Financial undertakings	2	3,346.70	863.06	138.88		14.16	31.89	1.24	0.05							0.37											864.67	138.93		14.16	31.89		
Credit institutions	3	2,405.91	588.05	54.24		2.60	1.83	1.24	0.05																		589.29	54.28		2.60	1.83		
Loans and advances	4																																
Debt securities, including UoP	5	2,405.91	588.05	54.24		2.60	1.83	1.24	0.05																		589.29	54.28		2.60	1.83		
Equity instruments	6																																
Other financial corporations	7	940.79	275.02	84.65		11.57	30.06								0.37												275.38	84.65		11.57	30.06		
of which investment firms	8																																
Loans and advances	9																																
Debt securities, including UoP	10																																
Equity instruments	11																																
of which management companies	12																																
Loans and advances	13																																
Debt securities, including UoP	14																																
Equity instruments	15																																
of which insurance undertakings	16	21.12																															
Loans and advances	17																																
Debt securities, including UoP	18	21.12																															
Equity instruments	19																																
Non-financial undertakings	20	2,430.25	855.41	449.70		21.36	267.12	1.76	0.06	0.06	0.23	0.09		0.01	37.89	1.06		0.51	92.62	1.01		33.51				1,021.43	451.91		21.36	267.70			
Loans and advances	21	159.25	40.13	18.37		0.90	15.07				0.09				2.13												42.35	18.37		0.90	15.07		
Debt securities, including UoP	22	2,270.99	815.28	431.33		20.46	252.05	1.76	0.06	0.06	0.15	0.09		0.01	35.76	1.06		0.51	92.62	1.01		33.51				979.08	433.55		20.46	252.64			
Equity instruments	23																																
Households	24	41,660.59	39,751.28	5,888.83	5,888.83																												
of which loans collateralised by residential immovable property	25	40,487.60	39,165.97	5,888.83	5,888.83																												
of which building renovation loans	26	1,529.29	1,529.29																														
of which motor vehicle loans	27	212.21	212.19																														
Local governments financing	28	297.85																															
Housing financing	29																																
Other local governments financing	30	297.85																															
Collateral obtained by taking possession: residential and commercial immovable properties	31																																
Assets excluded from the numerator for GAR calculation (covered in the denominator)	32	3,654.83																															
Financial and Non-financial undertakings	33	2,449.22																															
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34	2,217.06																															
Loans and advances	35	869.31																															
of which loans collateralised by commercial immovable property	36	43.72																															
of which building renovation loans	37	12.17																															
Debt securities	38	1,341.26																															
Equity instruments	39	6.48																															
Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	40	232.16																															
Loans and advances	41																																
Debt securities	42	232.16																															
Equity instruments	43																																
Derivatives	44	267.00																															
On demand interbank loans	45	142.98																															
Cash and cash-related assets	46	66.24																															
Other assets (e.g. Goodwill, commodities etc.)	47	729.38																															
Total GAR assets	48	51,390.22	41,469.75	6,477.40		35.53	299.00	3.00	0.11		0.06	0.23	0.09		0.01	38.26	1.06		0.51	92.62	1.01		33.51				41,637.37	6,479.67		35.53	299.59		
Assets not covered for GAR calculation	49	4,778.45																															
Central governments and Supranational issuers	50	2,531.63																															
Central banks exposure	51	2,246.82																															
Trading book	52																																
Total assets	53	56,168.68	41,469.75	6,477.40		35.53	299.00	3.00	0.11		0.06	0.23	0.09		0.01	38.26	1.06		0.51	92.62	1.01		33.51				41,637.37	6,479.67		35.53	299.59		
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																	
Financial guarantees	54	5.26																															
Assets under management	55	20,069.59	851.38	353.76	0.00	27.82	170.25	2.69	0.54	0.00	0.15	0.72	0.53	0.00	0.00	52.85	1.20	0.00	1.12	53.91	0.31	0.00	0.00	0.07	0.00	0.00	0.00	961.63	356.34	0.00	27.82	171.52	
Of which debt securities	56	5,397.57	54.81	22.83	0.00	1.17	10.74	1.29	0.01	0.00	0.01	0.15	0.14	0.00	0.00	4.22	0.16	0.00	0.15	1.61	0.12	0.00	0.00	0.02	0.00	0.00	0.00	62.11	23.26	0.00	1.17	10.90	
Of which equity instruments	57	14,101.81	796.58	330.93	0.00	26.64	159.51	1.40	0.53	0.00	0.14	0.56	0.39	0.00	0.00	48.63	1.04	0.00	0.97	52.30	0.19	0.00	0.00	0.05	0.00	0.00	0.00	899.52	333.08	0.00	26.64	160.63	



1.Assets for the calculation of GAR - CapEx

Million EUR		Disclosure reference date T-1																																
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)					Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	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		
CODE	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk			
GAR - Covered assets in both numerator and denominator																																		
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1	45.696,96	38.320,74	5.352,68		14,16	265,82	0,91	0,03		0,03															38.672,93	5.352,71		14,16	265,85				
Financial undertakings	2	3.405,35	123,38	21,73		6,79	6,48																			123,38	21,73		6,79	6,48				
Credit institutions	3	2.570,43																																
Loans and advances	4																																	
Debt securities, including UoP	5	2.570,43																																
Equity instruments	6																																	
Other financial corporations	7	834,93	123,38	21,73		6,79	6,48																			123,38	21,73		6,79	6,48				
of which investment firms	8																																	
Loans and advances	9																																	
Debt securities, including UoP	10																																	
Equity instruments	11																																	
of which management companies	12	1,53																																
Loans and advances	13																																	
Debt securities, including UoP	14	1,53																																
Equity instruments	15																																	
of which insurance undertakings	16	20,83																																
Loans and advances	17																																	
Debt securities, including UoP	18	20,83																																
Equity instruments	19																																	
Non-financial undertakings	20	2.695,10	830,50	356,45		7,38	259,34	0,91	0,03		0,03																831,41	356,48		7,38	259,37			
Loans and advances	21	183,59	51,64	18,94			13,64																				51,64	18,94			13,64			
Debt securities, including UoP	22	2.511,51	778,86	337,51		7,38	245,70	0,91	0,03		0,03																779,77	337,54		7,38	245,73			
Equity instruments	23																																	
Households	24	39.596,51	37.366,86	4.974,50																							37.718,14	4.974,50						
of which loans collateralised by residential immovable property	25	38.557,00	36.087,39	4.974,50																							36.087,39	4.974,50						
of which building renovation loans	26	1.095,02	1.095,02																									1.095,02						
of which motor vehicle loans	27	195,49	184,45																									184,45						
Local governments financing	28																																	
Housing financing	29																																	
Other local governments financing	30																																	
Collateral obtained by taking possession: residential and commercial immovable properties	31																																	
Assets excluded from the numerator for GAR calculation (covered in the denominator)	32	3.822,38																																
Financial and Non-financial undertakings	33	2.570,14																																
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	34	2.286,10																																
Loans and advances	35	897,23																																
of which loans collateralised by commercial immovable property	36	40,94																																
of which building renovation loans	37	2,61																																
Debt securities	38	1.380,59																																
Equity instruments	39	8,28																																
Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	40	284,04																																
Loans and advances	41																																	
Debt securities	42	284,04																																
Equity instruments	43																																	
Derivatives	44	242,67																																
On demand interbank loans	45	201,54																																
Cash and cash-related assets	46	62,60																																
Other assets (e.g. Goodwill, commodities etc.)	47	745,43																																
Total GAR assets	48	49.519,34	38.320,74	5.352,68		14,16	265,82	0,91	0,03		0,03																38.672,93	5.352,71		14,16	265,85			
Assets not covered for GAR calculation	49	4.661,57																																
Central governments and Supranational issuers	50	2.710,72																																
Central banks exposure	51	1.950,86																																
Trading book	52																																	
Total assets	53	54.180,92	38.320,74	5.352,68		14,16	265,82	0,91	0,03		0,03																38.672,93	5.352,71		14,16	265,85			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																		

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collateral obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

2. GAR sector information - Turnover

Breakdown by sector - NACE 4 digits level (code and label)		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
CODE	NACE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
005	C10.51 - Operation of dairies and cheese making																				0,07				0,07				
	C20.11 - Manufacture of industrial gases	2,60	0,15																						2,60	0,15			
	C21.10 - Manufacture of basic pharmaceutical products																	94,71							94,71				
	C23.51 - Manufacture of cement	3,62	0,16																						3,62	0,16			
	C23.62 - Manufacture of plaster products for construction purposes	8,63	8,18																						8,63	8,18			
	C25.93 - Manufacture of wire products, chain and springs	17,44	15,27																						17,44	15,27			
	C26.60 - Manufacture of irradiation, electromedical and electrotherapeutic equipment	14,86	12,07																						14,86	12,07			
	C27.11 - Manufacture of electric motors, generators and transformers	21,06	13,27							0,48	0,02			20,58	1,69										42,12	14,99			
	C27.40 - Manufacture of electric lighting equipment	12,75	1,28											2,26											15,01	1,28			
	C29.10 - Manufacture of motor vehicles	5,58	1,07											0,85											6,43	1,07			
	C32.50 - Manufacture of medical and dental instruments and supplies													23,24											23,24				
	D35.11 - Production of electricity	82,05	50,81																						82,05	50,81			
	D35.12 - Transmission of electricity	70,69	69,71																						70,69	69,71			
	D35.13 - Distribution of electricity	137,41	136,06							5,75	5,70														143,16	141,76			
	E36.00 - Water collection, treatment and supply	7,14	5,06			0,06	0,01			0,27	0,20			0,48	0,30			0,77	0,51						8,73	6,07			
	F42.11 - Construction of roads and motorways	13,92	7,28			0,84	0,03			0,00				1,85				0,02				0,00			16,64	7,31			
	G47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	0,01	0,00																						0,01	0,00			
	H52.21 - Service activities incidental to land transportation	0,17																							0,17				
	I56.29 - Other food service activities	0,43																							0,43				
	J58.21 - Publishing of computer games	0,37																							0,37				
	J58.29 - Other software publishing	9,53																							9,53				
	J61.20 - Wireless telecommunications activities	0,07	0,00			0,03								0,07											0,16	0,00			
	J62.01 - Computer programming activities	0,96																							0,96				
	J63.99 - Other information service activities n.e.c.	0,75																							0,75				
	L68.20 - Rental and operating of own or leased real estate	264,10	61,14																						264,10	61,14			
	M71.12 - Engineering activities and related technical consultancy	1,66	1,55			0,27	0,27			0,00				0,54								0,01			2,48	1,82			
	M72.11 - Research and experimental development on biotechnology																					79,73			79,73				
	N80.10 - Private security activities	5,33	0,01											0,09											5,42	0,01			
	N80.20 - Security systems service activities	2,61																							2,61				

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

2. The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.



2. GAR sector information - CapEx

Breakdown by sector - NACE 4 digits level (code and label)		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	wMn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
CODE	NACE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
005	C10.51 - Operation of dairies and cheese making	4,63																				0,47				5,10			
	C11.01 - Distilling, rectifying and blending of spirits	4,35	1,03			0,13								0,11												4,58	1,03		
	C11.05 - Manufacture of beer	0,01	0,01				0,00			0,00																0,01	0,01		
	C15.12 - Manufacture of luggage, handbags and the like, saddlery and harness	21,36	1,96																							21,36	1,96		
	C17.21 - Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0,56	0,13																							0,56	0,13		
	C20.11 - Manufacture of industrial gases	3,01	1,64																							3,01	1,64		
	C20.30 - Manufacture of paints, varnishes and similar coatings, printing ink and mastics	0,13																								0,13			
	C20.41 - Manufacture of soap and detergents, cleaning and polishing preparations	3,80	0,14											0,72												4,52	0,14		
	C20.42 - Manufacture of perfumes and toilet preparations	8,27	2,28																							8,27	2,28		
	C21.10 - Manufacture of basic pharmaceutical products	13,94	0,07															63,15								77,09	0,07		
	C23.51 - Manufacture of cement	5,61																								5,61			
	C23.62 - Manufacture of plaster products for construction purposes	11,68	10,58																							11,68	10,58		
	C24.44 - Copper production	0,92	0,66																							0,92	0,66		
	C25.93 - Manufacture of wire products, chain and springs	21,00	14,04																							21,00	14,04		
	C26.60 - Manufacture of irradiation, electromedical and electrotherapeutic equipment	25,25	8,92																							25,25	8,92		
	C27.11 - Manufacture of electric motors, generators and transformers	30,64	16,29											10,05	0,63											40,69	16,92		
	C27.40 - Manufacture of electric lighting equipment	13,04	1,29											2,09												15,12	1,29		
	C29.10 - Manufacture of motor vehicles	6,98	1,82																							6,98	1,82		
	C32.50 - Manufacture of medical and dental instruments and supplies	0,92	0,09											14,29												15,21	0,09		
	D35.11 - Production of electricity	139,47	120,66																							139,47	120,66		
	D35.12 - Transmission of electricity	71,27	70,87																							71,27	70,87		
	D35.13 - Distribution of electricity	120,64	97,64																							120,64	97,64		
	D35.22 - Distribution of gaseous fuels through mains	18,44	18,44																							18,44	18,44		
	E36.00 - Water collection, treatment and supply	9,08	4,95							0,14	0,09			0,65	0,43			1,27	1,01							11,14	6,48		
	F42.11 - Construction of roads and motorways	9,42	4,62			1,50	0,06			0,01				2,23				0,01				0,02				13,19	4,68		
	G46.75 - Wholesale of chemical products	7,06																								7,06			
	G47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	5,16	0,52											0,03												5,19	0,52		
	H52.21 - Service activities incidental to land transportation	0,11												0,41												0,52			
	I56.29 - Other food service activities	3,37																								3,37			
	J58.21 - Publishing of computer games	1,08				0,13																				1,21			
	J58.29 - Other software publishing	5,98	0,82																							5,98	0,82		
	J61.20 - Wireless telecommunications activities	0,18	0,01			0,01								0,03												0,22	0,01		
	J62.01 - Computer programming activities	18,96	3,65																							18,96	3,65		
	J63.99 - Other information service activities n.e.c.	0,96																								0,96			
	L68.20 - Rental and operating of own or leased real estate	260,48	63,82																							260,48	63,82		
	M71.12 - Engineering activities and related technical consultancy	5,32	2,72							0,09				0,05												5,46	2,72		
	M72.11 - Research and experimental development on biotechnology													7,25				28,19				33,02				68,45			
	N80.10 - Private security activities	1,89	0,01																							1,89	0,01		
	N80.20 - Security systems service activities	0,41																								0,41			

1 Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

2 The counterparty NACE sector allocation shall be based exclusively on the nature of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.

3. GAR KPI stock - Turnover

% (compared to total covered assets in the denominator)		Disclosure reference date T																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total assets covered				
CODE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
GAR - Covered assets in both numerator and denominator																																
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1	0,8043	0,1241		0,0002	0,0063	0,0020	0,0000		0,0000	0,0001	0,0001		0,0000	0,0012	0,0000		0,0000	0,0019	0,0000		0,0016			0,8110	0,1243		0,0002	0,0063	0,8499		
Financial undertakings	2	0,0175	0,0021		0,0001	0,0005	0,0020	0,0000						0,0002											0,0196	0,0021		0,0001	0,0005	0,0596		
Credit institutions	3	0,0125	0,0010		0,0000	0,0000	0,0019	0,0000																	0,0144	0,0010		0,0000	0,0000	0,0428		
Loans and advances	4																															
Debt securities, including UoP	5	0,0125	0,0010		0,0000	0,0000	0,0019	0,0000																	0,0144	0,0010		0,0000	0,0000	0,0428		
Equity instruments	6																															
Other financial corporations	7	0,0050	0,0011		0,0001	0,0005	0,0001							0,0002											0,0052	0,0011		0,0001	0,0005	0,0167		
of which investment firms	8																															
Loans and advances	9																															
Debt securities, including UoP	10																															
Equity instruments	11																															
of which management companies	12																															
Loans and advances	13																															
Debt securities, including UoP	14																															
Equity instruments	15																															
of which insurance undertakings	16						0,0000																			0,0000				0,0004		
Loans and advances	17																															
Debt securities, including UoP	18						0,0000																			0,0000				0,0004		
Equity instruments	19																															
Non-financial undertakings	20	0,0133	0,0075		0,0000	0,0058	0,0000	0,0000		0,0000	0,0001	0,0001		0,0000	0,0010	0,0000		0,0000	0,0019	0,0000		0,0016			0,0178	0,0076		0,0000	0,0058	0,0433		
Loans and advances	21	0,0006	0,0003			0,0003	0,0000	0,0000		0,0000	0,0000			0,0001								0,0000			0,0007	0,0003			0,0003	0,0028		
Debt securities, including UoP	22	0,0127	0,0071		0,0000	0,0055	0,0000	0,0000		0,0000	0,0001	0,0001		0,0000	0,0009	0,0000		0,0000	0,0019	0,0000		0,0016			0,0172	0,0073		0,0000	0,0055	0,0404		
Equity instruments	23																															
Households	24	0,7735	0,1146																							0,7735	0,1146				0,7417	
of which loans collateralised by residential immovable property	25	0,7621	0,1146																							0,7621	0,1146				0,7208	
of which building renovation loans	26	0,0298																														
of which motor vehicle loans	27	0,0041																								0,0041						
Local governments financing	28																															
Housing financing	29																															
Other local government financing	30																															
Collateral obtained by taking possession: residential and commercial immovable properties	31																															
Total GAR assets	32	0,8043	0,1241		0,0002	0,0063	0,0020	0,0000		0,0000	0,0001	0,0001		0,0000	0,0012	0,0000		0,0000	0,0019	0,0000		0,0016			0,8110	0,1243		0,0002	0,0063	0,9149		

1. Institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmenttally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmenttally sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

3. GAR KPI stock - Turnover

Disclosure reference date T-1																																
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which specialised lending	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	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	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	
GAR - Covered assets in both numerator and denominator																																
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1	0,8365	0,1169		0,0001	0,0068	0,0039																		0,8481	0,1170		0,0001	0,0068	0,9228		
Financial undertakings	2	0,0361	0,0068		0,0016	0,0027	0,0518																		0,0879	0,0068		0,0016	0,0027	0,0688		
Credit institutions	3						0,0641																		0,0641					0,0519		
Loans and advances	4																															
Debt securities, including UoP	5						0,0641																		0,0641					0,0519		
Equity instruments	6																															
Other financial corporations	7	0,1474	0,0278		0,0067	0,0111	0,0140																		0,1613	0,0278		0,0067	0,0111	0,0169		
of which investment firms	8																															
Loans and advances	9																															
Debt securities, including UoP	10																															
Equity instruments	11																															
of which management companies	12																															
Loans and advances	13																															
Debt securities, including UoP	14																															
Equity instruments	15																															
of which insurance undertakings	16						0,0927																		0,0927					0,0004		
Loans and advances	17																															
Debt securities, including UoP	18						0,0927																		0,0927					0,0004		
Equity instruments	19																															
Non-financial undertakings	20	0,2731	0,1285		0,0002	0,1115	0,0005	0,0001		0,0001															0,2736	0,1287		0,0002	0,1117	0,0544		
Loans and advances	21	0,1687	0,0282			0,0282	0,0015	0,0015		0,0015															0,1702	0,0297			0,0297	0,0037		
Debt securities, including UoP	22	0,2808	0,1359		0,0002	0,1176	0,0004																		0,2812	0,1359		0,0002	0,1176	0,0507		
Equity instruments	23																															
Households	24	0,9437	0,1256																						0,9526	0,1256				0,7996		
of which loans collateralised by residential immovable property	25	0,9633	0,1329																						0,9633	0,1329				0,7560		
of which building renovation loans	26	1,0000																							1,0000					0,0226		
of which motor vehicle loans	27	0,9435																							0,9435					0,0039		
Local governments financing	28																															
Housing financing	29																															
Other local government financing	30																															
Collateral obtained by taking possession: residential and commercial immovable properties	31																															
Total GAR assets	32	0,7719	0,1079		0,0001	0,0063	0,0036																		0,7826	0,1079		0,0001	0,0063	1,0000		

1. Institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures



3. GAR KPI stock - CapEx

% (compared to total covered assets in the denominator)		Disclosure reference date T																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total assets covered
CODE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
GAR - Covered assets in both numerator and denominator																																
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1	0,8070	0,1260		0,0007	0,0058	0,0001	0,0000		0,0000	0,0000		0,0000	0,0007	0,0000		0,0000	0,0018	0,0000			0,0007				0,8102	0,1261		0,0007	0,0058	0,8499	
Financial undertakings	2	0,0168	0,0027		0,0003	0,0006	0,0000	0,0000						0,0000												0,0168	0,0027		0,0003	0,0006	0,0596	
Credit institutions	3	0,0114	0,0011		0,0001	0,0000	0,0000	0,0000																		0,0115	0,0011		0,0001	0,0000	0,0428	
Loans and advances	4																															
Debt securities, including UoP	5	0,0114	0,0011		0,0001	0,0000	0,0000	0,0000																		0,0115	0,0011		0,0001	0,0000	0,0428	
Equity instruments	6																															
Other financial corporations	7	0,0054	0,0016		0,0002	0,0006								0,0000												0,0054	0,0016		0,0002	0,0006	0,0167	
of which investment firms	8																															
Loans and advances	9																															
Debt securities, including UoP	10																															
Equity instruments	11																															
of which management companies	12																															
Loans and advances	13																															
Debt securities, including UoP	14																															
Equity instruments	15																															
of which insurance undertakings	16																														0,0004	
Loans and advances	17																														0,0004	
Debt securities, including UoP	18																														0,0004	
Equity instruments	19																															
Non-financial undertakings	20	0,0166	0,0088		0,0004	0,0052	0,0000	0,0000		0,0000	0,0000		0,0000	0,0007	0,0000		0,0000	0,0018	0,0000			0,0007				0,0199	0,0088		0,0004	0,0052	0,0433	
Loans and advances	21	0,0008	0,0004		0,0000	0,0003					0,0000				0,0000											0,0008	0,0004		0,0000	0,0003	0,0028	
Debt securities, including UoP	22	0,0159	0,0084		0,0004	0,0049	0,0000	0,0000		0,0000	0,0000		0,0000	0,0007	0,0000		0,0000	0,0018	0,0000			0,0007				0,0191	0,0084	0,0004	0,0049	0,0404		
Equity instruments	23																															
Households	24	0,7735	0,1146																								0,7735	0,1146				0,7417
of which loans collateralised by residential immovable property	25	0,7621	0,1146																								0,7621	0,1146				0,7208
of which building renovation loans	26	0,0298																									0,0298					0,0272
of which motor vehicle loans	27	0,0041																									0,0041					0,0038
Local governments financing	28																														0,0053	
Housing financing	29																															
Other local government financing	30																														0,0053	
Collateral obtained by taking possession: residential and commercial immovable properties	31																															
Total GAR assets	32	0,8070	0,1260		0,0007	0,0058	0,0001	0,0000		0,0000	0,0000		0,0000	0,0007	0,0000		0,0000	0,0018	0,0000			0,0007				0,8102	0,1261		0,0007	0,0058	0,9149	

1. Institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmetnally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentatly sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures



3. GAR KPI stock - CapEx

% (compared to total covered assets in the denominator)		Disclosure reference date T-1																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which specialised lending	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling					
CODE	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk	
GAR - Covered assets in both numerator and denominator																																
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1	0,8386	0,1171		0,0003	0,0058																			0,8463	0,1171		0,0003	0,0058	0,9228		
Financial undertakings	2	0,0362	0,0064		0,0020	0,0019																			0,0362	0,0064		0,0020	0,0019	0,0688		
Credit institutions	3																														0,0519	
Loans and advances	4																															
Debt securities, including UoP	5																														0,0519	
Equity instruments	6																															
Other financial corporations	7	0,1478	0,0260		0,0081	0,0078																				0,1478	0,0260		0,0081	0,0078	0,0169	
of which investment firms	8																															
Loans and advances	9																															
Debt securities, including UoP	10																															
Equity instruments	11																															
of which management companies	12																															
Loans and advances	13																															
Debt securities, including UoP	14																															
Equity instruments	15																															
of which insurance undertakings	16																														0,0004	
Loans and advances	17																															
Debt securities, including UoP	18																														0,0004	
Equity instruments	19																															
Non-financial undertakings	20	0,3082	0,1323		0,0027	0,0962	0,0003																			0,3085	0,1323		0,0027	0,0962	0,0544	
Loans and advances	21	0,2813	0,1032			0,0743																				0,2813	0,1032			0,0743	0,0037	
Debt securities, including UoP	22	0,3101	0,1344		0,0029	0,0978	0,0004																			0,3105	0,1344		0,0029	0,0978	0,0507	
Equity instruments	23																															
Households	24	0,9437	0,1256																													
of which loans collateralised by residential immovable property	25	0,9633	0,1329																													
of which building renovation loans	26	1,0000																														
of which motor vehicle loans	27	0,9435																														
Local governments financing	28																															
Housing financing	29																															
Other local government financing	30																															
Collateral obtained by taking possession: residential and commercial immovable properties	31																															
Total GAR assets	32	0,7739	0,1081		0,0003	0,0054																				0,7810	0,1081		0,0003	0,0054	1,0000	

1. Institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmetnally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentatly sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

4. GAR KPI flow - Turnover

% (compared to flow of total eligible assets)		Disclosure reference date T																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total assets covered				
CODE	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
GAR - Covered assets in both numerator and denominator																																
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1	0,7855	0,1411		0,0001	0,0039	0,0020	0,0000		0,0000	0,0000		0,0000	0,0016	0,0001		0,0001					0,0000			0,7891	0,1412		0,0001	0,0039		0,8878	
Financial undertakings	2	0,0228	0,0026		0,0001	0,0015	0,0020	0,0000						0,0007											0,0255	0,0026		0,0001	0,0015		0,0648	
Credit institutions	3	0,0101	0,0008		0,0001	0,0000	0,0018	0,0000																	0,0119	0,0008		0,0001	0,0000		0,0298	
Loans and advances	4																															
Debt securities, including UoP	5	0,0101	0,0008		0,0001	0,0000	0,0018	0,0000																	0,0119	0,0008		0,0001	0,0000		0,0298	
Equity instruments	6																															
Other financial corporations	7	0,0127	0,0018		0,0001	0,0015	0,0003							0,0007											0,0136	0,0018		0,0001	0,0015		0,0350	
of which investment firms	8																															
Loans and advances	9																															
Debt securities, including UoP	10																															
Equity instruments	11																															
of which management companies	12																															
Loans and advances	13																															
Debt securities, including UoP	14																															
Equity instruments	15																															
of which insurance undertakings	16																															
Loans and advances	17																															
Debt securities, including UoP	18																															
Equity instruments	19																															
Non-financial undertakings	20	0,0059	0,0032			0,0023					0,0000	0,0000		0,0000	0,0009	0,0001		0,0001				0,0000			0,0068	0,0033			0,0024		0,0445	
Loans and advances	21																															
Debt securities, including UoP	22	0,0059	0,0032			0,0023					0,0000	0,0000		0,0000	0,0009	0,0001		0,0001				0,0000			0,0068	0,0033			0,0024		0,0445	
Equity instruments	23																															
Households	24	0,7568	0,1353																							0,7568	0,1353					0,7684
of which loans collateralised by residential immovable property	25	0,7300	0,1353																							0,7300	0,1353					0,7134
of which building renovation loans	26	0,0284																								0,0284						0,0270
of which motor vehicle loans	27	0,0147																								0,0147						0,0140
Local governments financing	28																															0,0101
Housing financing	29																															
Other local government financing	30																															0,0101
Collateral obtained by taking possession: residential and commercial immovable properties	31																															
Total GAR assets	32	0,7855	0,1411		0,0001	0,0039	0,0020	0,0000		0,0000	0,0000		0,0000	0,0016	0,0001		0,0001					0,0000			0,7891	0,1412		0,0001	0,0039		0,9517	

1. Institution shall disclose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.
2. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures.

4. GAR KPI flow - CapEx

%		Disclosure reference date T																															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total assets covered					
CODE		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
GAR - Covered assets in both numerator and denominator																																	
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation		1	0,7888	0,1437		0,0005	0,0056	0,0000	0,0000						0,0004	0,0000		0,0000					0,0001				0,7893	0,1437		0,0005	0,0056	0,8878	
Financial undertakings		2	0,0214	0,0035		0,0004	0,0024	0,0000	0,0000																		0,0214	0,0035		0,0004	0,0024	0,0648	
Credit institutions		3	0,0100	0,0008		0,0001	0,0000	0,0000	0,0000																		0,0101	0,0008		0,0001	0,0000	0,0298	
Loans and advances		4																															
Debt securities, including UoP		5	0,0100	0,0008		0,0001	0,0000	0,0000	0,0000																		0,0101	0,0008		0,0001	0,0000	0,0298	
Equity instruments		6																															
Other financial corporations		7	0,0114	0,0027		0,0003	0,0023																				0,0114	0,0027		0,0003	0,0023	0,0350	
of which investment firms		8																															
Loans and advances		9																															
Debt securities, including UoP		10																															
Equity instruments		11																															
of which management companies		12																															
Loans and advances		13																															
Debt securities, including UoP		14																															
Equity instruments		15																															
of which insurance undertakings		16																															
Loans and advances		17																															
Debt securities, including UoP		18																															
Equity instruments		19																															
Non-financial undertakings		20	0,0105	0,0049		0,0000	0,0032								0,0004	0,0000		0,0000					0,0001				0,0110	0,0049		0,0000	0,0032	0,0445	
Loans and advances		21																															
Debt securities, including UoP		22	0,0105	0,0049		0,0000	0,0032								0,0004	0,0000		0,0000					0,0001				0,0110	0,0049		0,0000	0,0032	0,0445	
Equity instruments		23																															
Households		24	0,7568	0,1353																								0,7568	0,1353				0,7684
of which loans collateralised by residential immovable property		25	0,7300	0,1353																								0,7300	0,1353				0,7134
of which building renovation loans		26	0,0284																									0,0284					0,0270
of which motor vehicle loans		27	0,0147																									0,0147					0,0140
Local governments financing		28																															
Housing financing		29																															
Other local government financing		30																															
Collateral obtained by taking possession: residential and commercial immovable properties		31																															
Total GAR assets		32	0,7888	0,1437		0,0005	0,0056	0,0000	0,0000						0,0004	0,0000		0,0000					0,0001				0,7893	0,1437		0,0005	0,0056	0,9517	

1. Institution shall disclose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.
2. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures.

5. KPI off-balance sheet exposures - Stock - Turnover

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T																																										
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)																		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	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	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae													
Financial guarantees (FinGuar KPI)		1																																										
Assets under management (AuM KPI)		2	0,7609	0,3352		0,1749	0,0277	0,0090		0,0010		0,0006		0,0005		0,0002		0,0000		0,0908		0,0053		0,0039		0,1386		0,0004		0,0000		0,0002		0,0000		0,0000		1,0000		0,3421		0,1749		0,0322

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

5. KPI off-balance sheet exposures - Stock - CapEx

% (compared to total eligible off-balance sheets assets)		Disclosure reference date T																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	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	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	
Financial guarantees (FinGuar KPI)		1																														
Assets under management (AuM KPI)		2	0,8854	0,3679		0,1770	0,0289	0,0028	0,0006		0,0002	0,0007	0,0005		0,0000	0,0550	0,0012		0,0012	0,0561	0,0003		0,0000	0,0001	0,0000		0,0000	1,0000	0,3706		0,1770	0,0303

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

5. KPI off-balance sheet exposures - Flow - Turnover

% (compared to total eligible off-balance sheets assets)		Disclosure reference date T																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	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	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	
Financial guarantees (FinGuar KPI)		1																														
Assets under management (AuM KPI)		2	0,6610	0,2792		0,1072	0,0345	0,0067		0,0016		0,0009	0,0001	0,0000		0,0000	0,0467	0,0042		0,0032	0,2856	0,0000		0,0000	0,0000		0,0000	1,0000	0,2850		0,1072	0,0385

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

5. KPI off-balance sheet exposures - Flow - CapEx

% (compared to total eligible off-balance sheets assets)		Disclosure reference date T																													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	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	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
Financial guarantees (FinGuar KPI)		1																													
Assets under management (AuM KPI)		2	0,8230	0,2972		0,1074	0,0327	0,0028	0,0009		0,0000	0,0000	0,0000	0,0000	0,0556	0,0009		0,0009	0,1186	0,0000		0,0000	0,0000		0,0000		1,0000	0,2991		0,1074	0,0336

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures



Argenta Assuranties

The reporting templates for Argenta Assuranties are shown below in accordance with Annexes IX and X of the Disclosures Delegated Act.

Only that portion of recorded gross premiums attributable to climate-related risks was taken into account in determining the taxonomy-eligibility of non-life insurance contracts. Taxonomy-eligible insurance contracts consist of fire insurance and vehicle damage.

The taxonomy-alignment of non-life insurance contracts cannot be shown as at 31 December 2024.

Argenta Asset Management and Arvestar

The reporting templates for Argenta’s asset management activities are shown below in accordance with Annexes III and IV of the Disclosures Delegated Act.

The figures reflect the consolidated assets managed by the entities Argenta Asset Management and Arvestar

For the taxonomy analysis of the activities of Argenta Asset Management (AAM) and Arvestar, we looked at all the investments in which investments are made through the funds. The analysis for determining the taxonomy KPIs is based on the data from Moody’s ESG Solutions. Where possible, this included a lookthrough of investments in third-party funds.

The underwriting KPI for non-life insurance and reinsurance undertakings

Economic activities (1)		Substantial contribution to climate change adaptation			DNSH (Do No Significant Harm)					Minimum safeguards (10)
		Absolute premiums, year t (2)	Proportion of premiums, year t (3)	Proportion of premiums, year t-1 (4)	Climate change mitigation (5)	Water and marine resources (6)	Circular economy (7)	Pollution (8)	Biodiversity and ecosystems (9)	
		Currency	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	
	CODE	2	3	4	5	6	7	8	9	10
A.1. Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable)	1	0	0		N	N	N	N	N	N
A.1.1 Of which reinsured	2	0	0		N	N	N	N	N	N
A.1.2 Of which stemming from reinsurance activity	3									
A.1.2.1 Of which reinsured (retrocession)	4									
A.2 Non-life insurance and reinsurance underwriting Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)	5	14.504.078,65	7,64							
B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities	6	175.216.636,40	92,36							
Total (A.1 + A.2 +B)	7	189.720.715,05	100,00							

“Premiums” in columns (2) and (3) shall be reported as gross premiums written or, as applicable, turnover relating to non-life insurance or reinsurance activity.

The information in column (4) shall be reported in disclosures in the year 2024 and thereafter.

Non-life insurance and reinsurance can only be aligned with Regulation (EU) 2020/852 as activity that enables climate change adaptation.

The proportion of the insurance or reinsurance undertaking’s investments that are directed at funding, or are associated with, Taxonomy-aligned in relation to total investments

		% (*) (**)	Value	
	Code	10	20	
The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities (*), with following weights for investments in undertakings per below:				
	Turnover-based	10	0,0617	350.705.309,75
	CapEx-based	20	0,0691	392.683.871,49
Assets covered by the KPI (**). Excluding investments in sovereign entities.		30	0,8258	5.679.918.399,29
* relative to the value of total assets covered by the KPI				
** relative to total investments (total AuM)				

Additional, complementary disclosures: breakdown of denominator of the KPI

				%	Value
		Code		10	20
Derivatives		10		0,0002	1.402.465,85
Exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU	Non-financial undertakings	20		0,2861	1.625.082.251,58
	Financial undertakings	30		0,1387	787.829.408,21
Exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU	Non-financial undertakings	40		0,2516	1.429.251.965,71
	Financial undertakings	50		0,0678	385.343.075,94
Exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU	Non-financial undertakings	60		0,2100	1.193.055.239,04
	Financial undertakings	70		0,1299	738.046.039,71
Exposures to other counterparties and assets		80		0,2040	1.158.919.241,61
Insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities		90		0,0544	308.872.667,45
All the investments that are funding economic activities that are not Taxonomy-eligible		100		0,7253	4.119.439.663,86
All the investments that are funding Taxonomy eligible economic activities, but not Taxonomy-aligned		110		0,2131	1.210.339.601,87

Additional, complementary disclosures: breakdown of numerator of the KPI

		Turnover		CapEx	
				%	value
		Code		10	20
Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU	Non-financial undertakings	10		0,0290	164.854.624,47
	Financial undertakings	20		0,0046	25.986.196,99
Insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities		30		0,0544	308.872.667,45
Taxonomy-aligned exposures to other counterparties and assets		40		0,0281	159.864.488,29

Breakdown of the numerator of the KPI per environmental objective
Taxonomy-aligned activities – provided ‘do-not-significant-harm’(DNSH) and social safeguards positive assessment

	CODE	Taxonomy-aligned activities					
						Enabling activities	
		Turnover		CapEx		Turnover	CapEx
		%	%	%	%	%	%
		10	20	30	40	50	60
(1) Climate change mitigation	10	0,0609	0,0689	0,0021	0,0038	0,0193	0,0181
(2) Climate change adaptation	20	0,0001	0,0000			0,0000	0,0000
(3) The sustainable use and protection of water and marine resources	30	0,0004	0,0000			0,0000	0,0000
(4) The transition to a circular economy	40	0,0002	0,0001			0,0002	0,0001
(5) Pollution prevention and control	50	0,0001	0,0001			0,0000	0,0000
(6) The protection and restoration of biodiversity and ecosystems	60	0,0000	0,0000			0,0000	0,0000



Template for the KPI of asset managers

The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:		The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	
Turnover-based (%):	0,0177	Turnover-based [monetary amount]:	292,31
CapEx-based (%):	0,0216	CapEx-based [monetary amount]:	356,34
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities.		The monetary value of assets covered by the KPI.Excluding investments in sovereign entities.	
Coverage ratio (%):	0,8213	Coverage [monetary amount]:	16.483,93
Additional, complementary disclosures: breakdown of denominator of the KPI			
The percentage of derivatives relative to total assets covered by the KPI (%):	0,0004	The value in monetary amounts of derivatives [monetary amount]:	6,52
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	0,0129	For non-financial undertakings [monetary amount]:	212,93
For financial undertakings:	0,0512	For financial undertakings [monetary amount]:	844,60
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	0,5082	For non-financial undertakings [monetary amount]:	8.377,40
For financial undertakings:	0,1244	For financial undertakings [monetary amount]:	2.050,21
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	0,1443	For non-financial undertakings [monetary amount]:	2.379,11
For financial undertakings:	0,0509	For financial undertakings [monetary amount]:	839,62
The proportion of exposures to other counterparties over total assets covered by the KPI (%):	0,1034	Value of exposures to other counterparties [monetary amount]:	1.704,51
The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI (%):		Value of all the investments that are funding economic activities that are not taxonomy-eligible [monetary amount]:	
Turnover-based (%):	0,9482	Turnover-based [monetary amount]:	15.629,58
CapEx-based (%):	0,9417	CapEx-based [monetary amount]:	15.522,30
The value of all the investments that are funding taxonomy-eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI (%):		Value of all the investments that are funding taxonomy-eligible economic activities, but not taxonomy-aligned [monetary amount]:	
Turnover-based (%):	0,0341	Turnover-based [monetary amount]:	562,04
CapEx-based (%):	0,0367	CapEx-based [monetary amount]:	605,29
Additional, complementary disclosures: breakdown of numerator of the KPI			
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non financial undertakings - Turnover-based (%)	0,0155	For non financial undertakings - Turnover-based (monetary amount):	256,26
For non financial undertakings - Capital expenditures-based (%)	0,0189	For non financial undertakings - Capital expenditures-based (monetary amount):	310,93
For financial undertakings - Turnover-based (%)	0,0002	For financial undertakings - Turnover-based (monetary amount):	3,83
For financial undertakings - Capital expenditures-based (%)	0,0001	For financial undertakings - Capital expenditures-based (monetary amount):	0,97
Breakdown of the numerator of the KPI per environmental objective			
Taxonomy-aligned activities:			
(1) Climate change mitigation			
Turnover (%):	0,0174	Transitional activities (A%)	
CapEx (%):	0,0215	Turnover (%):	0,0014
		CapEx (%):	0,0017
		Enabling activities (B%)	
		Turnover (%):	0,0091
		CapEx (%):	0,0103
(2) Climate change adaptation			
Turnover (%):	0,0001	Enabling activities (B%)	
CapEx (%):	0,0000	Turnover (%):	0,0000
		CapEx (%):	0,0000
(3) The sustainable use and protection of water and marine resources			
Turnover (%):	0,0000	Enabling activities (B%)	
CapEx (%):	0,0000	Turnover (%):	0,0000
		CapEx (%):	0,0000
(4) The transition to a circular economy			
Turnover (%):	0,0003	Enabling activities (B%)	
CapEx (%):	0,0001	Turnover (%):	0,0002
		CapEx (%):	0,0001
(5) Pollution prevention and control			
Turnover (%):	0,0000	Enabling activities (B%)	
CapEx (%):	0,0000	Turnover (%):	0,0000
		CapEx (%):	0,0000
(6) The protection and restoration of biodiversity and ecosystems			
Turnover (%):	0,0000	Enabling activities (B%)	
CapEx (%):	0,0000	Turnover (%):	0,0000
		CapEx (%):	0,0000



Exposures to nuclear energy and fossil gas-related activities

In accordance with Annex XII of the Disclosures Delegated Act, additional information relating to exposures to nuclear energy and fossil gas-related activities is reported. Further to the Draft Commission Notice of 21 December 2023, the set of templates, if relevant, must be reported for each KPI. The KPIs for credit institutions are the stock, flow and off-balance sheet exposures. Here, a distinction is always being made between the turnover and CapEx-based KPIs. For the flow of Argenta Spaarbank and the KPI relating to the investments of Argenta Assuranties, the exposures to nuclear energy and fossil gas are not regarded as material. The set of templates for off-balance sheet exposures of Argenta Spaarbank reflects Argenta’s asset management activities.

Argenta Spaarbank - Flow

Template 1 - Nuclear and fossil gas related activities

	YES/NO	
	CODE	a
Nuclear energy related activities		
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	1	NO
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	2	NO
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	3	YES
Fossil gas related activities		
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	4	NO
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	5	NO
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	6	NO



Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	838,9476	0,1411	838,9389	0,1411	0,0088	0,0000
Total applicable KPI	8	838,9476	0,1411	838,9389	0,1411	0,0088	0,0000

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	854,3890	0,1437	854,3802	0,1437	0,0088	0,0000
Total applicable KPI	8	854,3890	0,1437	854,3802	0,1437	0,0088	0,0000



Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	838,9476	1,0000	838,9389	1,0000	0,0088	1,0000
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	838,9476	1,0000	838,9389	1,0000	0,0088	1,0000

Template 3 - Taxonomy-aligned economic activities (numerator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	854,3890	1,0000	854,3802	1,0000	0,0088	1,0000
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	854,3890	1,0000	854,3802	1,0000	0,0088	1,0000



Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)						
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	1,4170	0,0002	1,4170	0,0002	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	3.841,5910	0,6462	3.829,5896	0,6441	12,0014	0,0020
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	3.843,0080	0,6464	3.831,0066	0,6444	12,0014	0,0020

Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)						
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,1979	0,0000	0,1979	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	3.834,9728	0,6450	3.834,8533	0,6450	0,1195	0,0000
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	3.835,1707	0,6451	3.835,0512	0,6451	0,1195	0,0000



Template 5 - Taxonomy non-eligible economic activities - Turnover

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	1.253,8185	0,2109
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	1.253,8185	0,2109

Template 5 - Taxonomy non-eligible economic activities - CapEx

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	1.252,8742	0,2107
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	1.252,8742	0,2107



Argenta Spaarbank – Stock

Template 1 - Nuclear and fossil gas related activities

	YES/NO	
Nuclear energy related activities		
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	1	YES
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	2	YES
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	3	YES
Fossil gas related activities		
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	4	YES
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	5	YES
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	6	YES



Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0045	0,0000	0,0045	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,2787	0,0000	0,2787	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0570	0,0000	0,0570	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0664	0,0000	0,0664	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	6.379,7266	0,1241	6.379,3765	0,1241	0,3501	0,0000
Total applicable KPI	8	6.380,1332	0,1242	6.379,7831	0,1241	0,3501	0,0000

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0030	0,0000	0,0030	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,1129	0,0000	0,1129	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0678	0,0000	0,0678	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,3482	0,0000	0,3482	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0234	0,0000	0,0234	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	6.476,9581	0,1260	6.476,8472	0,1260	0,1109	0,0000
Total applicable KPI	8	6.477,5134	0,1260	6.477,4025	0,1260	0,1109	0,0000



Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,0045	0,0000	0,0045	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,2787	0,0000	0,2787	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,0570	0,0000	0,0570	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,0664	0,0000	0,0664	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	6.379,7266	0,9999	6.379,3765	0,9999	0,3501	1,0000
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	6.380,1332	1,0000	6.379,7831	1,0000	0,3501	1,0000

Template 3 - Taxonomy-aligned economic activities (numerator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,0030	0,0000	0,0030	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,1129	0,0000	0,1129	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,0678	0,0000	0,0678	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,3482	0,0001	0,3482	0,0001	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,0234	0,0000	0,0234	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	6.476,9581	0,9999	6.476,8472	0,9999	0,1109	1,0000
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	6.477,5134	1,0000	6.477,4025	1,0000	0,1109	1,0000



Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0331	0,0000	0,0331	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,1750	0,0000	0,1750	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	10,0958	0,0002	10,0958	0,0002	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,9704	0,0000	0,9704	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0278	0,0000	0,0278	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	35.043,8177	0,6819	34.941,4520	0,6799	102,3657	0,0020
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	35.055,1198	0,6821	34.952,7541	0,6801	102,3657	0,0020

Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)						
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0060	0,0000	0,0060	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0728	0,0000	0,0728	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	2,8749	0,0001	2,8749	0,0001	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,1315	0,0000	0,1315	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	34.992,1469	0,6809	34.989,2593	0,6809	2,8876	0,0001
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	34.995,2321	0,6810	34.992,3445	0,6809	2,8876	0,0001



Template 5 - Taxonomy non-eligible economic activities - Turnover

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	9.713,7048	0,1890
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	9.713,7048	0,1890

Template 5 - Taxonomy non-eligible economic activities - CapEx

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	9.752,8541	0,1898
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	9.752,8541	0,1898



Argenta Assuranties

Template 1 - Nuclear and fossil gas related activities

	YES/NO	
Nuclear energy related activities		
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	1	YES
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	2	YES
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	3	YES
Fossil gas related activities		
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	4	YES
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	5	YES
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	6	YES



Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0066	0,0000	0,0066	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,1444	0,0000	0,1444	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0204	0,0000	0,0204	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0290	0,0000	0,0290	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	346,3519	0,0610	345,9399	0,0609	0,4120	0,0001
Total applicable KPI	8	346,5523	0,0610	346,1403	0,0609	0,4120	0,0001

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0044	0,0000	0,0044	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0560	0,0000	0,0560	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0113	0,0000	0,0113	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,1772	0,0000	0,1772	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0093	0,0000	0,0093	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	390,8355	0,0688	390,8354	0,0688	0,0000	0,0000
Total applicable KPI	8	391,0937	0,0689	391,0936	0,0689	0,0000	0,0000



Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,0066	0,0000	0,0066	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,1444	0,0004	0,1444	0,0004	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,0204	0,0001	0,0204	0,0001	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,0290	0,0001	0,0290	0,0001	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	346,3519	0,9994	345,9399	0,9994	0,4120	1,0000
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	346,5523	1,0000	346,1403	1,0000	0,4120	1,0000

Template 3 - Taxonomy-aligned economic activities (numerator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount	%	Amount	%	Amount	%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,0044	0,0000	0,0044	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,0560	0,0001	0,0560	0,0001	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,0113	0,0000	0,0113	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,1772	0,0005	0,1772	0,0005	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,0093	0,0000	0,0093	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	390,8355	0,9993	390,8354	0,9993	0,0000	1,0000
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	391,0937	1,0000	391,0936	1,0000	0,0000	1,0000



Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)						
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
	Amount		%	Amount		%	
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0136	0,0000	0,0136	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0830	0,0000	0,0830	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	3,5139	0,0006	3,5139	0,0006	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,2918	0,0001	0,2918	0,0001	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0139	0,0000	0,0139	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	1.131,2307	0,1992	1.106,3247	0,1948	24,9061	0,0044
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	1.135,1469	0,1999	1.110,2409	0,1955	24,9061	0,0044

Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)						
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
	CODE	a	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0013	0,0000	0,0013	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0572	0,0000	0,0572	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,7512	0,0001	0,7512	0,0001	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0339	0,0000	0,0339	0,0000	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	1.157,0486	0,2037	1.155,0938	0,2034	1,9548	0,0003
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	1.157,8922	0,2039	1.155,9374	0,2035	1,9548	0,0003



Template 5 - Taxonomy non-eligible economic activities - Turnover

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	4.119,4397	0,7253
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	4.119,4397	0,7253

Template 5 - Taxonomy non-eligible economic activities - CapEx

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,0000	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,0000	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,0000	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0000	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,0000	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,0000	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	4.119,4397	0,7253
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	4.119,4397	0,7253



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Template 1 - Nuclear and fossil gas related activities

	YES/NO	
Nuclear energy related activities		
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	1	YES
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	2	YES
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	3	YES
Fossil gas related activities		
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	4	YES
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	5	YES
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	6	YES



Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	
	CODE	a	b	c	d	e
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,02	0,0000	0,02	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,16	0,0000	0,16	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	287,06	0,0174	286,23	0,0174	0,83
Total applicable KPI	8	287,24	0,0174	286,41	0,0174	0,83

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	
	CODE	a	b	c	d	e
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,03	0,0000	0,03	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,01	0,0000	0,01	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,01	0,0000	0,01	0,0000	0,00
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,00	0,0000	0,00	0,0000	0,00
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	354,25	0,0215	353,71	0,0215	0,54
Total applicable KPI	8	354,30	0,0215	353,76	0,0215	0,54



Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
	CODEa	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,02	0,0001	0,02	0,0001	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,16	0,0005	0,16	0,0006	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	287,06	0,9994	286,23	0,9994	0,83
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	287,24	1,0000	286,41	1,0000	0,83

Template 3 - Taxonomy-aligned economic activities (numerator) - CapEx

Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
	CODEa	b	c	d	e	f
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3	0,03	0,0001	0,03	0,0001	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0,01	0,0000	0,01	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5	0,01	0,0000	0,01	0,0000	0,0000
Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	7	354,25	0,9999	353,71	0,9999	0,54
Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	8	354,30	1,0000	353,76	1,0000	0,54



Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
	CODEa	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,20	0,0000	0,20	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	6,69	0,0004	6,69	0,0004	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	32,94	0,0020	32,94	0,0020	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	3,88	0,0002	3,88	0,0002	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,01	0,0000	0,01	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	326,80	0,0198	319,94	0,0194	0,0004
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	370,52	0,0225	363,66	0,0221	0,0004

Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
	CODEa	b	c	d	e	f
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,00	0,0000	0,00	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,08	0,0000	0,08	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,51	0,0000	0,51	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	3,74	0,0002	3,74	0,0002	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,79	0,0000	0,79	0,0000	0,0000
Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,01	0,0000	0,01	0,0000	0,0000
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	494,65	0,0300	492,50	0,0299	0,0001
Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	8	499,77	0,0303	497,63	0,0302	0,0001



Template 5 - Taxonomy non-eligible economic activities - Turnover

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,00	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,00	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,00	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,00	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,00	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,00	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	15.629,58	0,9482
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	15.629,58	0,9482

Template 5 - Taxonomy non-eligible economic activities - CapEx

		Amount	Percentage
Economic activities	CODE	a	b
Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0,00	0,0000
Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0,00	0,0000
Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0,00	0,0000
Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,00	0,0000
Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0,00	0,0000
Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0,00	0,0000
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	7	15.522,30	0,9417
Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'	8	15.522,30	0,9417



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Definitions

You will find below definitions of terms and concepts used in sustainability reporting, clarifying how Argenta interprets these terms and what they cover.

Term	Description
Corporate culture	Corporate culture embraces the unwritten rules, practices and behaviours of all employees within a specific organisation. These are, in turn, based on a set of shared values. The following values are instilled in Argenta's DNA: close at hand, enterprising, pragmatic and simple (referred to as DOPE). DOPE is a guide for our daily conduct. We want to reinforce and embed it further still – that is the responsibility of each and every Argentan.
Company purpose	A purpose is the raison d'être and incentive driving an organisation. For Argenta, it is as follows: "In an unpredictable world, Argenta is doing what is exceptional in the financial sector: taking care of customers, employees, branch staff, shareholders and society in a thoroughly responsible manner, to ensure they are better able to meet the challenges of this unpredictable world."
Conflict of interest	A conflict of interest is when a person or organisation has a self-interest that (apparently) conflicts with the interest of another party, creating an incentive to act in a way that is contrary to the responsibility assumed by this person or organisation in respect of the other party.
Administrative bod-ies	The Board of Directors is the highest decision-making body in Argenta. The members of the Executive Committee sit on the Board of Directors, together with a number of directors representing the shareholders and a number of independent directors. The Board of Directors is supported in its tasks by advisory and supporting committees.
Bonus culture	This refers to whether or not an organisation has an annual variable remuneration system, shares and stock options, deferred remuneration or other bonuses, including bonuses for achieving ESG targets.
Correct remuneration of employees	An appropriate pay policy is built on four foundations: sustainability, market conformity, net purchasing power and transparency. Interaction between these foundations is crucial. This also involves adopting collective bargaining agreements, with all employees falling under the same pay system.
Corruption	Corruption means the abuse of public office for private gain.

CPBW	The Committee for Prevention and Protection at Work (or "CPBW" for short) is a jointly composed consultative body. The CPBW provides for worker participation on issues relating to the well-being of workers, in accordance with the Act of 4 August 1996 on the well-being of workers in the performance of their work.
Data privacy	Data privacy for customers means that customers are enabled to decide themselves about how their personal data may be processed and for what purpose, in accordance with GDPR provisions. Personal data can be someone's name, location, contact details or online behaviour.
Data security	This relates to the process of protecting digital information throughout its entire lifecycle, so that it is protected against corruption, theft or unwanted access. It covers everything: hardware, software, storage devices, user devices; access controls and administrative controls, as well as the policy and procedures involved in covering these risks by focusing on prevention, detection and remediation.
Discrimination	Discrimination is the unequal or unfair treatment of another person based on personal characteristics which do not justify this distinction.
Sustainable investment product range	This denotes a range of investment products integrating sustainability, based on the principles of the Sustainable Finance Disclosure Regulation (in line with Article 8 or 9). The underlying investments are intended to finance sustainable projects or have sustainable features, taking into consideration impact on the environment, society and governance principles. This also encompasses communication to our customers on the sustainable nature of the funds, which we run in a fair and transparent way.
Sustainable credit product range	A sustainable credit product range focuses on the financing of initiatives that aim to reduce impact on the environment, and/or take social aspects into consideration. At Argenta, it entails, for example, financing sustainable homes, sustainable renovation projects or sustainable mobility.
Commitment by the employees	This refers to the commitment, motivation climate, ambassadorship, well-being and experiences of employees at the workplace. It demonstrates the rational and emotional connectedness employees feel and have vis-à-vis their employer.
ESG risk management	The management of climate and sustainability risks (ESG) appropriately and proactively within the associated risks and activities with a view to achieving the business objectives of the various business lines responsibly, in accordance with Argenta's sustainability policy and purpose.

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External Service for Prevention and Protection at Work	Argenta works closely together with the External Service for Prevention and Protection at Work (“EDPB”) for specific support and expertise in the area of psychosocial risks – in 2024 this was Mensura, and in 2025 Cohezio. Two prevention advisers on psychosocial aspects from the EDPB are always on hand to provide in-house employees with support in matters such as stress, burn-out, conflicts, discrimination, unwanted inappropriate behaviour, or consumption of alcohol or drugs. These prevention advisers look for solutions in such matters, for example within the scope of a meeting, by involving another person in the organisation or through mediation.
External prevention advisers on psycho-social aspects	For specific support and expertise relating to psychosocial risks, Argenta worked closely together with the EDPB in 2024. The prevention advisers on psychosocial aspects are on hand to provide in-house employees with support in matters such as stress, burn-out, conflicts, discrimination, unwanted inappropriate behaviour, or consumption of alcohol or drugs.
Financial health of Argenta	Financial health refers to the general financial health of Argenta and the extent to which Argenta can grow in the long term.
Fraud	Fraud is deliberate and unlawful conduct with the aim of gaining an advantage for oneself and/or another party and/or of intentionally damaging Argenta.
Physical climate risks	These are the risks associated with the physical effects of climate change and environmental damage. They can be acute as well as chronic. Acute physical risk factors are the consequence of extreme climate and environmental events, such as drought, flooding, or environmental disasters leading to soil, air or water pollution. Chronic physical risk factors are the consequence of long-term climate and environmental events, which could lead, for example, to rising sea levels and loss of biodiversity.
Rule of conduct	Rules describing how an institution should behave with the aim of better protecting customers.
Breach	An identified infringement of an internal or external rule (of conduct).
Incident	Any deviation from the planned services provided by the relevant service or department as a result of failing processes, systems or individuals, or as a result of external events.

Internal prevention adviser	The internal prevention adviser is the central contact point for everything to do with the health, safety and welfare of employees. They advise employees as well as the employer and perform their tasks entirely independently. In other words, they must always ensure that their advice is neutral and objective, so they cannot be a representative of the employer or employees. The prevention adviser can be approached to discuss matters such as: <ul style="list-style-type: none">• Safety (electrical installations, fire, first aid, etc.)• Health (absenteeism, reintegration, flu vaccinations, etc.)• Ergonomics (ergonomic workplace, ergonomic tools, working position, etc.)• Psychosocial aspects (stress, burn-out, undesired inappropriate behaviour, etc.)
Complaints	Any form of negative feedback on Argenta’s services and/or products, for which standard management procedures have already been implemented and the complainant is still expecting compensation and/or corrective action.
Customer satisfac-tion	This refers to the general experience and satisfaction of customers in respect of the organisation, brand, product range and services, as well as with key points of contact, such as branches and employees, including complaint management.
Climate adaptation	Climate adaptation means that we have to adjust to the current and future consequences of climate change.
Climate mitigation	Climate mitigation means that we have to restrict the current and future consequences of climate change as much as we can.
Whistleblowing	Whistleblowing is the reporting of (attempts at) illegal, immoral or non-legitimate practices (misconduct) within the scope of Argenta’s control, to responsible persons authorised to take action against such practices.
Management bod-ies	The Executive Committee is responsible for implementing the strategy laid down by the Board and for management of the company.
Investing locally	Via its own investment portfolio, Argenta invests in local and regional governments, government companies and public-private partnerships, and, in doing so, it supports local projects for the common good and in the interest of society.
Employee Opinion Survey	Argenta has been conducting an annual Employee Opinion Survey since 2015. Argenta uses this survey to sound out key aspects that impact perception of working at Argenta: questions are asked on the commitment, motivation climate, ambassadorship and well-being of employees. Argenta uses the results to discuss and address areas for improvement.
Nexus	This is the monthly meeting of the Executive Committee and the directors to discuss primarily strategic matters.

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Bribery	Bribery means convincing someone in a dishonest way to act in your favour by giving them a gift in the form of money or some other incentive.
Principle of good governance	The Board of Directors strives to manage the company in accordance with the principles of corporate governance, with the aim of properly managing and monitoring the company on the basis of a set of rules and behaviours. Corporate governance includes setting the company's ob-jectives, establishing effective governance and internal control, recognising and taking due account of the interests of all members of the company, and conducting the business in accordance with the principles of sound and prudent management pursuant to the applicable legal and regulatory provisions.
Sanctions Committee	The Sanctions Committee is made up of members of senior management who decide on the imposition of sanctions in the event of serious findings.
Key officer	Key officers are the directors, members of the Executive Committee and actual management and persons in charge of independent control functions (internal audit function, risk management function, compliance function and actuarial function).
Social inclusion of customers	This is a policy aimed at improving the capabilities, opportunities and dignity of all customers, and pays special attention to individuals or groups of customers who are disadvantaged in society based on their identity.
Union delegation	<p>The union delegation is a social consultation body (without joint representation), whose members are appointed, not elected. The main powers of the union delegation relate to areas such as:</p> <ul style="list-style-type: none">• working relationships• negotiations with a view to concluding collective bargaining agreements or agreements within the company, without jeopardising collective bargaining agreements or agreements concluded in other fields• applicability within the company of social legislation, collective bargaining agreements, work regulations and individual employment agreements• compliance with the general principles set out in articles 2 to 5 of Collective Bargaining Agreement no. 5 (general principles)• Support for employees in collective or individual disputes
Training and development	The potential of employees to develop and grow through training, e-learning, coaching and the exchange of knowledge and experience between colleagues and managers.
Transition-related climate risks	These are the risks associated with the timing and speed of the transition to a more sustainable economy in the area of climate, and the impact on our business activities.

Supervisory bodies	The Audit Committee, Risk Committee and the Group Supervisory Committee support the Board of Directors in the performance of its oversight responsibilities.
Investing responsibly	<p>By breathing financial life into sustainable projects and projects of social relevance on the one hand, and adopting an intentional exclusion policy with respect to non-sustainable projects on the other, Argenta consciously contributes to a sustainable society.</p> <p>1/ We adopt a general sustainable exclusion policy for our own investment portfolio, our Argenta funds and the Arvestar funds.</p> <p>2/ We invest in sustainable companies and projects via a range of different channels. Via our sustainable Argenta funds, we aim to ensure best-in class investments, or we focus on sustainable aspects. Via our own investment portfolio, we want to invest in local projects focusing on sustainable and socially-relevant challenges, and we apply sustainable investment criteria so that we can invest more impactfully.</p> <p>3/ We make room for impact investments, so that we can fulfil our sustainability aspirations. For example, we look at carbon-neutral investments that can compensate for Argenta's footprint.</p>
Responsible marketing practices	To ensure responsible marketing practices, consideration is given to importance for the environment and social impact, with focus placed on integrity and transparency. Important principles that support a responsible marketing policy include: - Products and services must meet the Nods of customers; - Awareness of a positive customer experience across all channels; - Product range is easy to understand, clear and sim-ple; - Product range complies with legislation and regulations; - Maxi-mum transparency about products, price, small print; - Honest commu-nication, without discrimination or stereotyping - No greenwashing.
Well-being Survey	The Well-being Survey was launched for the first time in 2024. Argenta's Employee Opinion Survey asks more high-level questions about well-being, whereas the Well-being Survey maps the well-being of the employees using the well-being indicators, which we use to gauge the drivers and levers impacting employees' well-being at Argenta.

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Disclosure requirements and information incorporated by reference

This chapter provides an overview of the European Sustainability Reporting Standards (ESRS) covered in Argenta’s Sustainability Statement: ESRS 2 and four thematic standards. The overview only includes the reporting requirements that are material under the thematic standard. Thematic standards E2, E3, E4, E5, S2 and S5 are not included because they were found to be not material.

Cross-cutting standards	
Disclosure requirement	Page
ESRS 2 - General disclosures	
BP-1	General basis for preparation of sustainability statements <p>p.55</p>
BP-2	Disclosures in relation to specific circumstances <p>p.56-57</p>
GOV-1	The role of the administrative, management and supervisory bodies <p>p.37-49</p>
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies <p>p.37-48</p>
GOV-3	Integration of sustainability-related performance in incentive schemes <p>p.50, 59</p>
GOV-4	Statement on due-diligence <p>p.59</p>
GOV-5	Risk management and internal controls over sustainability reporting <p>p.59-60</p>
SBM-1	Strategy, business model and value chain <p>p.61-64</p>
SBM-2	Interests and views of stakeholders <p>p.65</p>
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model <p>p.68-69, 70-71, 97-98, 106, 107, 119-121, 127</p>
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities <p>p.66-68</p>
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement <p>p.69, 179-183</p>

Environment	
Disclosure requirement	Page
E1 - Climate change	
ESRS2 GOV-3	Integration of sustainabilityrelated performance in incentive schemes <p>p.50, 59</p>
E1-1	Transition plan for climate change mitigation <p>p.82-91</p>
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model <p>p.70-71</p>
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities <p>p.71-75</p>
E1-2	Policies related to climate change mitigation and adaptation <p>p.81-82</p>
E1-3	Actions and resources in relation to climate change policies <p>p.82-91</p>
E1-4	Targets related to climate change mitigation and adaptation <p>p.82-91</p>
E1-5	Energy consumption and mix <p>p.92</p>
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions <p>p.93-97</p>



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Social Disclosure requirements		Page
S1 - Own workforce		
ESRS 2 SBM-2	Interests and views of stakeholders	p.65 , 107
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p.107
S1-1	Policies related to own workforce	p.111-113
S1-2	Processes for engaging with own workers and workers' representatives about impacts	p.114
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	p.114-115
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	p.115-118
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p.115-118
S1-6	Characteristics of the undertaking's employees	p.108-109
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	p.109-110
S1-8	Collective bargaining coverage and social dialogue	p.110
S1-9	Diversity metrics	p.110
S1-10	Adequate wages	p.111
S1-13	Training and skills development metrics	p.116-118
S1-15	Work-life balance metrics	p.110
S1-16	Compensation metrics (pay gap and total compensation)	p.111
S1-17	Incidents, complaints and severe human rights impacts	p.118

Social Disclosure requirements		Page
S4 - Klanten		
ESRS 2 SBM-2	Interests and views of stakeholders	p.65 , 97
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p.97-98
S4-1	Policies related to consumers and end-users	p.98-100
S4-2	Processes for engaging with consumers and endusers about impacts	p.100-101
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	p.101-102
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	p.102-104
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p.104-106

Governance Disclosure requirements		Page
G1 - Verantwoord beleid		
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	p.37-49
SRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	p.66-68
G1-1	Business conduct policies and corporate culture	p.121-125
G1-3	Prevention and detection of corruption and bribery	p.125-127
G1-4	Confirmed incidents of corruption or bribery	p.127

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Data points arising from other EU legislation

The following table provides an overview of all data points arising from other EU legislation, as specified in Appendix B of ESRS 2. The table specifies where the data points can be found in the Sustainability Statement, including the data points that are considered to be not material for Argenta.

Disclosure requirement	Paragraph	Datapoint	SFDR	Pijler 3	Benchmark regulation reference	EU Klimaat-wet	Material	Page
ESRS 2 GOV-1	21 d	Board's gender diversity	■		■		Yes	p.53
ESRS 2 GOV-1	21 e	Percentage of board members who are independent			■		Yes	p.38
ESRS 2 GOV-4	30	Statement on due diligence	■				Yes	p.59
ESRS 2 SBM-1	40(d) i	Involvement in activities related to fossil fuel activities	■	■	■		N/A	
ESRS 2 SBM-1	40(d) ii	Involvement in activities related to chemical production	■		■		N/A	
ESRS 2 SBM-1	40(d) iii	Involvement in activities related to controversial weapons	■		■		N/A	
ESRS 2 SBM-1	40(d) iv	Involvement in activities related to cultivation and production of tobacco			■		N/A	
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				■	Yes	p.82-91
ESRS E1-1	16(g)	Undertakings excluded from Paris-aligned benchmarks		■	■		Yes	p.82-91, 127-131
ESRS E1-4	34	GHG emission reduction targets	■	■	■		Yes	p.82-91
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	■				N/A	
ESRS E1-5	37	Energy consumption and mix	■				Yes	p.92
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	■				N/A	
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	■	■	■		Yes	p.93-97
ESRS E1-6	53-55	Gross GHG emissions intensity	■	■	■		Yes	p.94
ESRS E1-7	56	GHG removals and carbon credits				■	N/A	
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			■		Phase-in	
ESRS E1-9	66(a)	Disaggregation of monetary amounts by acute and chronic physical		■			Phase-in	
ESRS E1-9	66(c)	Location of significant assets at material physical risk		■			Phase-in	

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Disclosure requirement	Paragraph	Datapoint	SFDR	Pijler 3	Benchmark regulation reference	EU Klimaat-wet	Material	Page
ESRS E1-9	67(c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		■			Phase-in	
ESRS E1-9	69	Degree of exposure of the portfolio to climaterelated opportunities			■		Phase-in	
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the EPRTTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	■				No	
ESRS E3-1	9	Water and marine resources	■				No	
ESRS E3-1	13	Dedicated policy	■				No	
ESRS E3-1	14	Sustainable oceans and seas	■				No	
ESRS E3-4	28(c)	Total water recycled and re-used	■				No	
ESRS E3-4	29	Total water consumption in m³ per net revenue on own operations	■				No	
ESRS 2 IRO-1 E4	16(a) i		■				Yes	p.66-69
ESRS 2 IRO-1 E4	16(b)		■				Yes	p.66-69
ESRS 2 IRO-1 E4	16(c)		■				Yes	p.66-69
ESRS E4-2	24(b)	Sustainable land / agriculture practices or policies	■				No	
ESRS E4-2	24(c)	Sustainable oceans / seas practices or policies	■				No	
ESRS E4-2	24(d)	Policies to address deforestation	■				No	
ESRS E5-5	37(d)	Non-recylced waste	■				No	
ESRS E5-5	39	Hazardous waste and radioactive waste	■				No	
ESRS 2 SBM-3 S1	14(f)	Risk of incidents of forced labour	■				Yes	p.111
ESRS 2 SBM-3 S1	14(g)	Risk of incidents of child labour	■				Yes	p.111
ESRS S1-1	20	Human rights policy commitments	■				Yes	p.111
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			■		Yes	p.111
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	■				Yes	p.111
ESRS S1-1	23	workplace accident prevention policy or management system	■				Yes	p.113
ESRS S1-3	32(c)	Grievance/complaints handling mechanisms	■				Yes	p.114-115
ESRS S1-14	88(b) en (c)	Number of fatalities and number and rate of work-related accidents paragraph	■		■		No	
ESRS S1-14	88(e)	Number of days lost to injuries, accidents, fatalities or illness	■				No	

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Disclosure requirement	Paragraph	Datapoint	SFDR	Pijler 3	Benchmark regulation reference	EU Klimaat-wet	Material	Page
ESRS S1-16	97(a)	Unadjusted gender pay gap	■		■		Yes	p.111
ESRS S1—16	97(b)	Excessive CEO pay ratio	■				Yes	p.50
ESRS S1-17	103(a)	Incidents of discrimination	■				Yes	p.118
ESRS S1-17	104(a)	Nonrespect of UNGPs on Business and Human Rights and OECD	■		■		Yes	p.118
ESRS S2 SBM-3 S2	11(b)	Significant risk of child labour or forced labour in the value chain	■				No	
ESRS S2-1	17	Human rights policy commitments	■				No	
ESRS S2-1	18	Policies related to value chain workers	■				No	
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	■		■		No	
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			■		No	
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	■				No	
ESRS S3-1	16	Human rights policy commitments	■				Yes	p.98-100
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	■		■		Yes	p.98-100
ESRS S3-4	36	Human rights issues and incidents	■				Yes	p.101-102
ESRS S4-1	16	Policies related to consumers and end-users	■				No	
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	■		■		No	
ESRS S4-4	35	Human rights issues and incidents	■				No	
ESRS G1-1	10(b)	United Nations Convention against Corruption	■				Yes	p.125-126
ESRS G1-1	10(d)	Protection of whistleblowers	■				Yes	p.124
ESRS G1-4	24(a)	Fines for violation of anti-corruption and anti-bribery laws	■		■		Yes	p.125-127
ESRS G1-4	24(b)	Standards of anticorruption and anti- bribery	■				Yes	p.125-126

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Qualitative notes in context of Pillar 3

Qualitative note in context of climate-related risks

Topic	Information	Section
Business context and strategy	Description of business strategy for integration of ecological factors concerning business environment and model, strat-egy and financial planning	6.1.3 Sustainability strategy, 6.2.3 Climate strategy
	Description of objectives for assessing climate-related risks in the short, medium and long term	6.2.3 Climate strategy, 4.1.4 Risk policy on sustainability
	Description of current measures for achieving environmen-tal objectives and taxonomy activities	6.2.3 Climate strategy
	Description of policy on counterparties and their environmental strategy	6.4.3 Investing responsibly and locally
Governance	Description of responsibility for managing risk policy and implementing goals, strategy and policy	4.1.2 Organisation of the risk management function 5.2. Board of Directors and Committees
	Description of management integration of short, medium and long term environmental effects	4.1.2 Organisation of the risk management function 5.2. Board of Directors and Committees
	Description of committee roles, tasks and responsibilities	4.1.2 Organisation of the risk management function 5.2. Board of Directors and Committees
	Description of quantity and method of sustainability report-ing	4.1 Risk policy 4.1.4 Risk policy on sustainability
	Description of remuneration policy with regard to climate-related goals	6.1.2 Bonus culture, 6.3.2 Proximity to our employees

Risk management	Description of integration of short, medium and long term effects in the risk policy	6.2.1 Financial effects from risks and opportunities, 6.2.3 Climate risk policy, 4.1.4 Risk policy on sustainability
	Description of definitions, methodology and standards on which risk management is based	4.1.4 Risk policy on sustaina-bility 6.2.1 Understanding climate change
	Description of processes for identifying, measuring and monitoring activities and exposures sensitive to climate risk	6.2.1 Financial effects from risks and opportunities, 6.2.3 Climate risk policy, 4.1.4 Risk policy on sustainability
	Description of activities and commitments for reducing climate risk	6.2.3 Climate strategy
	Description of implementation of methods for identifying, measuring and managing climate-related risks	6.2.1 Financial effects from risks and opportunities, 6.2.3 Climate risk policy, 4.1.4 Risk policy on sustainability
	Description of impact and results of implemented methods on climate-related risks	6.2.1 Financial effects from risks and opportunities, 6.2.3 Climate risk policy, 4.1.4 Risk policy on sustainability
	Description of data availability, quality and correctness and actions to improve this	6.1.1 Methods and estimates, 6.2.1 Understanding climate change
	Description of climate-related risk limits and procedures if these limits are exceeded	6.2.1 Understanding climate change, 4.1.2 Risk policy on sustainability
	Description of the relationship between climate related risks and credit, liquidity, financing, market, operational and reputational risk.	6.2.1 Materiality analysis of climate and sustainability risks in 2024

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Qualitative note in context of social risks

Topic	Information	Section
Business context and strategy	Description of business strategy for integration of social factors and risks concerning business environment and model, strategy and financial planning	6.1.3 Sustainability strategy 6.3 Social 4.1 Risk policy 4.1.4 Risk policy on sustainability
	Description of objectives for assessing socially related risks in the short, medium and long term	4.1 Risk policy 4.1.4 Risk policy on sustainability 6.3 Social
	Description of policy in respect of counterparties and their commitment to avoiding socially undesirable side effects	6.4.4 Investing responsibly and locally
Governance	Description of responsibilities for management regarding risk policy and implementing goals, strategy and policy, with regard to: Maatschappelijke inspanningen (i) Social efforts (ii) Relationship with staff and employment rights (iii) Relationship with customers, their protection and product responsibilities (iv) Human rights	5.2 Board of Directors and Committees, 4.1 Risk policy, 4.2.4 Risk policy on sustainability
	Description of measures for integrating social factors and risks in internal governance, the tasks and responsibilities and the evaluation processes	4.1 Risk policy
	Description of reporting efforts with regard to social risks	4.1 Risk policy
	Description of remuneration policy with regard to socially related objectives	6.3.2 Proximity to our employees

Risk management	Description of measures for integrating social factors and risks in internal governance, the tasks and responsibilities and the evaluation processes	4.1.4 Risk policy on sustainability
	Description of reporting efforts with regard to social risks	4.1.4 Risk policy on sustainability
	Description of remuneration policy with regard to socially related objectives	6.3 Social
	Description of measures for integrating social factors and risks in internal governance, the tasks and responsibilities and the evaluation processes	4.1.4 Risk policy on sustainability
	Description of reporting efforts with regard to social risks	4.1 Risk policy
	Description of remuneration policy with regard to socially related objectives	4.1.4 Risk policy on sustainability

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Qualitative note in context of governance risks

Topic	Information	Section
Governance	Description of the governance policy in context of relationships with counterparties, the management organisation, committee roles, tasks and responsibilities with regard to economic, ecological and social risks	5.2 Board of Directors and Committees, 6.2.1 Understanding climate change, 6.4.3 Investing responsibly and locally
	Description of the responsibilities in respect of counterparties in context of non-financial reporting	5.2.2 Audit Committee, 6.2.3 Climate strategy – investment activities, 6.4.3 Investing responsibly and locally
	Description of integration of governance considerations in respect of the governance performance of counterparties a. Ethical considerations b. Strategy and risk management c. Inclusivity d. Transparency e. Conflicts of interest f. Internal communication with regard to controversies	6.2.3 Climate strategy – investment activities, 6.4.3 Investing responsibly and locally
Risk management	Description of the integration of risk management in respect of the governance performance of counterparties a. Ethical considerations b. Strategy and risk management c. Inclusivity d. Transparency e. Conflicts of interest Internal communication with regard to controversies	4.1 Risk policy 4.1.4 Risk policy on sustainability



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Main features of the internal control and risk management systems

A set of internal control and risk management systems have been developed for the financial reporting process.

The risks that need to be addressed in all annual accounting and prudential reporting are the timeliness, correctness, completeness and accuracy of the figures.

The NBB has issued a circular (NBB_2017_27) on the quality of the reported prudential and financial data. The self-assessment on compliance with these prudential expectations is prepared annually and submitted to the auditors.

There are ongoing processes to comply with the BCBS 239 standard, which deals with the “principles for effective risk data aggregation and risk reporting” and which has a more extensive scope.



Information on important events after balance sheet date

(This chapter forms an integral part of the consolidated financial statements.)

On 24 February 2025, Argenta Asset Management (AAM) and Degroof Petercam Asset Management (DPAM) signed a share purchase agreement (SPA) for the purchase by AAM of 2,501 class B shares held by DPAM, representing 25.01% of the capital of Arvestar. Following the share transfer from DPAM to AAM that will take effect on the closing of the share transfer (expected in mid-April 2025, subject to the fulfilment of a number of conditions precedent in the share purchase agreement (SPA)), Arvestar will become a 100% subsidiary of the Argenta Group. The services provided by DPAM to Arvestar (outsourcing of the portfolio management of the Arvestar funds and support services) will remain unchanged after the share transfer and will be described in an amended version of the Financial Management Agreement entered into between Arvestar and DPAM that will also enter into force on closing.

To the best of the knowledge of the Board of Directors, no other significant event has occurred since the end of the financial year concerning the Company or the group.

Information on circumstances that may impact development

Information must be provided annually on circumstances that could have a material impact on the development of the Company and Argenta Group, unless they are of a nature that could cause serious disadvantage to the Company or Argenta Group.

To the best of the Board of Directors’ knowledge, there are no circumstances other than those mentioned in this Annual Report that could have a material impact on the Company’s development.



Information on research and development work

Technological developments in the financial sector are evolving at a very rapid pace, and the Argenta Group is therefore doing what is necessary to offer more and better digital solutions to its customers. The IT departments have been designated as R&D centres of the Argenta Group in connection with this.

The most important visible development for customers is the further refinement of the Argenta app, which is increasingly widely used by Argenta customers.

In 2024, Argenta continued working on its new insurance platform for non-life and life insurance, which was given the name Assurando.

Capital increases

During the 2024 financial year, the Company carried out a capital increase of EUR 54,971,935 on 29 May. 123,886 new shares were issued, increasing the Company’s capital by EUR 12,388,600 with an additional share premium.

Acquisition of own shares

Neither the Company, nor a direct subsidiary, nor any person acting in their own name but on behalf of the Company or the direct subsidiary acquired shares of the Company.

Measures use of financial instruments

Argenta Spaarbank uses derivatives (swaps, caps and swaptions) to hedge the overall interest rate risk. These derivatives were all entered into with other financial institutions with which it has collateral agreements.

These swaps and swaptions have been documented as micro and macro fair value hedges.

Apart from the swaps, caps and swaptions entered into to hedge interest rate risk, no other derivatives have been used to hedge transactions directly or to hedge specific portfolios. More details on these derivatives and their use can be found in the consolidated financial statements.

The other companies do not use derivatives.



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Discussion of the separate financial statements of Argenta Bank- en Verzekeringsgroep

Balance sheet

Total assets increased from EUR 1,391,765,642 to EUR 1,466,685,809 in 2024. This change is the result of the higher value of participating interests due to a capital increase at subsidiary Argenta Spaarbank and an increase in cash investments.

Assets (in euros)	31/12/2023	31/12/2024
Property, plant and equipment	81,175	54,175
Participating interests	1,340,287,449	1,410,411,659
Receivables	3,115,263	2,474,022
Financial investments	48,011,331	53,394,292
Prepaid expenses and deferred charges	270,424	351,662
Total assets	1,391,765,642	1,466,685,809

Equity increased due to the capital increase following the addition of profit for financial year 2023 and decreased due to the payment of an interim dividend.

Liabilities and equity (in euros) before profit appropriation	31/12/2023	31/12/2024
Equity	1,257,068,968	1,336,805,128
Liabilities	3,050,609	2,456,454
Accrued expenses and deferred income	0	0
Profit for the financial year	131,646,066	127,424,227
Total liabilities and equity	1,391,765,642	1,466,685,809

Net profit

The net profit for the 2024 financial year was EUR 127.4 million compared to EUR 131.6 million in 2023. A dividend for financial year 2023 and an interim dividend from reserves were paid in 2024.

Argenta Bank- en Verzekeringsgroep's net profit as a coordinating holding company consists mainly of dividends received from its subsidiaries.

Dividend (in euros)	31/12/2023	31/12/2024
Argenta Assuranties interim dividend	40,249,975	26,162,484
Argenta Asset Management dividend	148,571	151,428
Argenta Spaarbank interim dividend	92,935,700	101,384,400
	133,334,246	127,698,312

The difference between the dividends received and the net profit for the financial year is due to the costs at Argenta Bank- en Verzekeringsgroep level that are not passed on to its subsidiaries.

Profit appropriation at the end of the financial year

An interim dividend of EUR 24,121,604 was paid on 21 October out of the reserves. A final dividend of EUR 84,536,944.48 will be proposed to the General Meeting of Shareholders. A total of EUR 108,658,548.48 will thus then be paid out of the profit for the financial year.

Profit appropriation:

- Profit for the financial year available for appropriation: EUR 127,424,227
- Transfer to other reserves: EUR 36,516,071
- Transfer to the legal reserve: EUR 6,371,211
- Final dividend to be distributed: EUR 84,536,944.48

Equity

Capital and share premiums changed in 2024 due to the dividend payment for financial year 2023 and the subsequent capital increase.

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Discussion of the consolidated financial statements of Argenta Bank- en Verzekeringsgroep

The consolidated financial statements for the 2024 financial year (1 January 2024 to 31 December 2024) of Argenta Bank- en Verzekeringsgroep nv were prepared in accordance with the International Financial Reporting Standards (IFRS).

The consolidated financial statements and tables are in euros, unless otherwise explicitly stated in the table in question.

Development in 2024

The post-Covid economic recovery in the Eurozone continued at a moderate pace in 2024, mainly driven by strong domestic demand. This was supported by a robust labour market, with Eurozone unemployment rates dropping to record lows. Headline Eurozone inflation decreased to close to the ECB's 2% target in 2024. All this allowed the ECB to ease monetary policy in 2024, after raising policy rates by 450 basis points to 4% in 2022 and 2023. Finally, the ECB was able to lower policy rates by 1% in 2024 to 3%, and financial markets expect this easing to continue in 2025.

The combination of looser monetary policy and the expectation that the European economy is still on track for a “soft landing” meant equity markets continued to reach new highs in 2024. However, this scenario is still surrounded by much uncertainty given the global (geo)political context with wars in Ukraine and the Middle East, the election of Donald Trump as the new president in the US and political impasses in several European countries with, in some cases, large and rising budget deficits.

Impact on Argenta Savings Bank

Argenta has continued to focus strategically on differentiated incomes. Interest-driven income made up the largest share of this, and we saw this normalise again somewhat in 2024, after the growth in the previous year. Interest expenses for funding continued to increase, but were partly offset by sharply rising income and interest rate hedges.

The restrictive policy rolled out by the ECB in recent years, combined with strong competition among banks in terms of raising funds, has led to higher interest rates on savings accounts and term investments. The ECB's easing meant that savings rates did not rise any further but remained higher than in 2023.

Argenta's customers also easily found their way to the more profitable savings options. We recorded EUR 4.7 billion of growth in our growth and loyalty accounts, and the production of EUR 4.4 billion in term investments. These funds came from our regular savings account (EUR 2.3 billion), but mainly from the EUR 5.4 billion of 1-year term deposits that matured. This was issued in September 2023, and Argenta offered its customers the same net return as on the one-year government bond. In Belgium, Argenta saw net growth in funds raised of EUR 0.8 billion. As other banks saw strong inflows from the government bond maturing, our market share of funds raised fell from 9.15% back to 8.77%. In the Netherlands, we recorded growth of EUR 0.4 billion and a rise in market share from 0.56% to 0.62%. All of this together led to a near doubling of our interest expenses in 2024 on retail deposits.

In 2024, non-retail funding further increased to EUR 7.5 billion. The maturing of the EUR 0.5 billion EMTN and EUR 0.4 billion Green Apple notes in 2024 was offset by EUR 1.5 billion issuances of covered bonds. The interest rates expected by investors are higher than those on maturing volumes, so here too we saw increased interest expenses.

Argenta's interest income also increased, but not to the same extent as interest expenses. Interest income on our mainly interest-driven investment portfolio increased, despite Argenta continuing to pursue a cautious investment policy.

The mortgage portfolio also included a larger volume of loans at higher interest rates compared to 2023. The rise in market interest rates did not continue in 2024, and as a result production volumes picked up again in both Belgium and the Netherlands. In Belgium, there was production of EUR 2.3 billion (EUR +0.4 billion) with an average customer rate of 3.39% (-34 bp), and the Netherlands had a production volume of EUR 2.8 billion (+EUR 0.5 billion) at an average customer rate of 4.18% (-2 bp).

The non-interest-rate-driven results developed favourably in 2024. There continued to be interest in the range of funds, and this was boosted by the favourable



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stock market year. This resulted in a further increase in revenues from asset management activities, with a combination of EUR 1.3 billion (EUR +0.6 billion) in production and growth in NAV of EUR 1.0 billion (EUR +0.2 billion), causing the result from management to grow by EUR 18 million to EUR 142 million.

Impact on Argenta Assuranties

Total income (new premiums and reinvestments) for the branch 21 life insurance fell compared to 2023 (EUR 384 million compared to EUR 604 million). For 2024, this was EUR 122 million in production from reserve transfers/switches and EUR 262 million in new production. In 2023, this was EUR 367 million and EUR 237 million, respectively. This was mainly the effect of lower reinvestments of matured amounts from previously held insurance contracts within this branch, that had reached the end of their interest guarantee period. Excluding these reinvestments, however, we saw an increase in production. This was due to the launch of the new product ALP Plus, which offered a guaranteed interest rate of 2.80% over the period from 5 August 2024 to 11 October 2024. This attractive guaranteed interest rate also coincided with the maturing of the 1-year government bond, and of Argenta Spaarbank term deposits with a term of 1 year, and helped boost the production of ALP Plus at Aras.

There was an increase in the premiums received in branch 23. In 2023, investors were still hesitant after the unfavourable stock market year of 2022, which, combined with interesting fixed-income (banking) alternatives, resulted in lower production. In 2024, we saw a renewed increase in interest in branch 23, probably driven by the favourable stock market year of 2023 and its continuation in 2024. Total premium income was EUR 227 million, representing a 17% increase compared to 2023. For 2024, this was EUR 21 million in production from reserve transfers/switches and EUR 205 million in new production. In 2023, this was EUR 53 million and EUR 140 million, respectively.

The total premium income for branch 21 and branch 23 combined did fall from EUR 797 million to EUR 611 million. This was mainly driven by branch 21 (lower reinvestments).

The total income from non-life insurance amounted to EUR 190 million in 2024 compared to EUR 179 million in 2023.

Key figures (unaudited)

The table below gives the key figures of Argenta Bank- en Verzekeringsgroep nv, or BVg for short (hereinafter the Company).

	31/12/2023	31/12/2024
Return on equity	8.9%	8.9%
Return on total assets	0.51%	0.52%
Cost/income ratio (excluding bank levies)	42.0%	41.6%
Cost/income ratio (including bank levies)	53.5%	53.1%
Common equity Tier 1 ratio	22.4%	28.7%
Total capital ratio	22.4%	28.7%
Leverage ratio	5.2%	5.4%
Liquidity coverage ratio	219%	197%
Net stable funding ratio	141%	146%
Minimum requirement for own funds and eligible liabilities (LRE) (Bank Pool)	8.7%	8.8%
Minimum requirement for own funds and eligible liabilities sub-ordinated (LRE) (Bank Pool)	8.7%	8.8%
Minimum requirement for own funds and eligible liabilities (TREA) (Bank Pool)	39.5%	50.0%
Minimum requirement for own funds and eligible liabilities sub-ordinated (TREA) (Bank Pool)	39.5%	50.0%

The return on equity is calculated by dividing the net profit by the equity available at the beginning of the financial year.

In calculating the cost/income ratio, the costs of insurance services – which are recognised under the net insurance service result – are allocated to the relevant other administrative expenses and fee and commission expenses.

The Tier 1 ratio rose from 22.4% to 28.7% at the end of 2024. The increase in the ratio is the result of the combination of an increase in the risk-weighted assets and an increase in equity (through addition of the profit for the financial year).

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Risk-weighted assets decreased during 2024 due to the adoption of the internal model for Dutch residential loan portfolios, the application file for which was submitted in 2022. This led to a decrease in risk-weighted assets by EUR 1.8 billion.

Evolution of the balance sheet

Total assets rose by 3.9% from EUR 60.3 billion as of 31 December 2023 to EUR 62.7 billion as of 31 December 2024.

Cash and balances with (central) banks rose by EUR 240.5 million to EUR 2.5 billion as of 31 December 2024. Part of the Company’s liquidity is held with the ECB pending reinvestment in mortgage loans or debt securities.

The investment portfolio fell by EUR 0.2 billion compared to the end of 2023. This amount consists of i) a EUR 4.5 billion investment portfolio that is measured at fair value through other comprehensive income, and ii) a EUR 7.3 billion portfolio of debt securities measured at amortised cost. Finally, there is a limited portfolio of debt securities that IFRS standards require to be measured at fair value through profit or loss.

	31/12/2023	31/12/2024
Non-trading financial assets mandatorily at fair value through profit or loss	106,229,924	107,829,888
Financial assets at fair value through other comprehensive in-come	4,906,197,653	4,516,887,273
Financial assets at amortised cost – debt securities	7,118,153,567	7,342,132,726
Total securities portfolio	12,130,581,144	11,966,849,887

The portfolio of loans and advances increased from EUR 42.1 billion as of 31 December 2023 to EUR 44.2 billion as of 31 December 2024. This growth primarily reflects the production of new loans in both the Netherlands and Belgium.

EUR 5.1 billion of mortgage loans were granted to customers in 2024 (EUR 2.3 billion in Belgium and EUR 2.8 billion in the Netherlands), as against EUR 4.2 billion in 2023. This brings the mortgage loan portfolio to EUR 42.1 billion as of 31 December 2024, compared to EUR 40.1 billion in 2023.

	31/12/2023	31/12/2024
Financial assets at amortised cost – loans and advances	42,141,082,681	44,184,290,857
of which mortgage loans	40,056,309,428	42,131,676,233

Financial liabilities at amortised cost increased by EUR 1.7 billion to EUR 52.1 billion as of 31 December 2024.

Deposits from credit institutions fell compared to 31 December 2023. This heading contains the cash collateral received for the derivatives for the purposes of hedging the interest rate risk.

The increase in senior debt securities issued is due to the debt securities issued in 2024 under the Covered Bond programme (of EUR 1.5 billion), offset in part by factor repayments on the bonds issued as a result of the securitisation transactions and the full repayment (call) of one securitisation transaction and the maturity of an EMTN issue.

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	31/12/2023	31/12/2024
Deposits from central banks	0	0
Deposits from credit institutions	1,130,294,811	862,766,910
Deposits from other than central banks and credit institutions	42,421,463,560	43,678,738,881
Senior debt securities issued	6,727,324,493	7,461,999,198
Subordinated debt securities issued	0	0
Other financial liabilities	85,899,307	93,093,464
Financial liabilities at amortised cost	50,364,982,170	52,096,598,454

The other financial liabilities include EUR 93.1 million of lease liabilities. The assets side of the balance sheet shows a similar increase for the assets related to these leases.

Assets under insurance contracts amounted to EUR 3 million. Assets under reinsurance contracts remained nearly unchanged. Liabilities under insurance and reinsurance contracts rose by EUR 143.0 million. Assets and liabilities relating to branch 23 insurance contracts increased from EUR 3.0 billion as of 31 December 2023 to EUR 3.2 billion on 31 December 2024.

	31/12/2023	31/12/2024
Financial assets related to unit-linked insurance contracts (branch 23)	2,995,790,474	3,218,139,911
Assets under insurance contracts	0	3,037,654
Assets under reinsurance contracts	27,259,304	27,260,527
Financial liabilities related to unit-linked insurance contracts (branch 23)	2,995,790,474	3,218,139,911
Liabilities under insurance contracts	2,683,342,397	2,824,567,144
Liabilities under reinsurance contracts	15,637,315	17,387,420



Drivers of net profit

In 2024 the Company achieved a consolidated net profit (including minority interests) of EUR 327,105,069 for the 2024 financial year compared to EUR 310,029,123 for the previous financial year. The Company’s net profit here is driven by developments in the underlying Bank Pool and Insurance Pool.

The Bank Pool (including BVg) achieved a net profit (including minority interests) of EUR 273,049,621 for financial year 2024, compared to EUR 241,254,228 for financial year 2023. This increase reflects an improvement in the net profit of Argenta Spaarbank (EUR +21.0 million) and an increase in the net profit of the two management companies (EUR +9.4 million). The Insurance Pool realised a net profit of EUR 54,055,448 for financial year 2024 compared to EUR 68,774,896 for financial year 2023. The decrease in net profit is the result of continued good underlying insurance results (net insurance service result and reinsurance service result), a decrease in the net insurance finance result, and an increase in administrative expenses (partly allocated to the underwriting result) due to the implementation of refined cost allocation that allocates a higher volume of expenses to Aras. The interest result as the main driver of the recurring operating result was significantly supplemented by net fee and commission income related to the provision and management of investment funds and branch 23 insurance contracts, and a solid underwriting result.

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Net interest income fell from EUR 823.9 million to EUR 777.5 million. Interest income increased due to the combination of the increase in yields from the securities portfolio (EUR +54.1 million), a combination of the increase in yields and further growth of the mortgage portfolio (EUR +121.3 million) and the increase in interest income on consumer loans and term loans (EUR +10.1 million).

The funding costs (excluding derivatives) rose as a result of the increased interest payments on both retail and non-retail funding. Interest expenses on deposits and term accounts increased by a total of EUR 274.0 million. The interest expenses on wholesale issues increased by a total of EUR 22.8 million because the interest expenses for the RMBS bonds rose relatively sharply (due to repricing of the variable interest payment), and because of the additional issues of covered bonds.

The net interest result of hedging derivatives developed positively. As a result of higher Euribor interest rates, the net interest expenses for the derivatives were EUR 75.6 million lower (and the cost-of-carry of the payer swaps derivatives portfolio fell). The movement of the yield curve had a limited negative impact on the time-value cost of the swaptions of EUR 7.5 million in 2023. Net fee and commission income increased from EUR 87.8 million in 2023 to EUR 118.5 million for financial year 2024. There was an increase in fees paid to independent branch managers (EUR +17.8 million) with a simultaneous increase in net management fees received (EUR +32.7 million) and transaction costs (EUR +9.4 million) on assets under management and custody in the Investment pillar and branch 23 insurance products. They increased further due to increased assets under management and entry fees on new investments. Net fees received for payment services increased by EUR 7.6 million.

Gains or losses from financial assets and liabilities held for trading and gains or losses from hedge accounting amounted to EUR -3.8 million for financial year 2024. In 2023, these amounted to EUR -11.3 million due to the change in the difference (basis spread) between the yield curves used to value the derivatives and the hedged items.

The gains or losses on financial assets (mandatorily) measured at fair value through profit or loss amounted to EUR 7.9 million and increased by EUR 2.8 million.

The underwriting result on insurance and reinsurance contracts was EUR 22.7 million and decreased by EUR 1.3 million. The non-life underwriting result decreased by EUR 8.1 million. This was mainly due to an increase in allocated costs (acquisition and servicing), which rose by EUR 8.6 million. The life underwriting result (life savings and life risk) increased by EUR 12.6 million, mainly due to the development of life risk. During 2024, we recorded a decrease in the estimate of future obligations mainly due to an increase in expected hospitalisation insurance premiums. The reinsurance result decreased by EUR 5.8 million, due to an increase in reinsurance premiums.

Net other operating income amounts to EUR 14.6 million and includes recovery of administrative costs from customers, and of rent and IT infrastructure-related recoveries from agents.

Staff expenses amounted to EUR 128.4 million for financial year 2024 compared to EUR 119.9 million for the previous financial year and mainly reflect the increase in FTEs and the inflation cost on salaries. This heading contains the salaries, social security charges and costs of pension schemes for Company employees.



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Other administrative expenses fell from EUR 336.6 million in financial year 2023 to EUR 313.5 million in financial year 2024. Expenses for complying with all legal requirements and bank levies remained high at EUR 108.8 million (EUR -3.2 million compared to 2023). From 2024, no more contributions will have to be made to the Single Resolution Fund. However, the focus was on insourcing/filling vacancies in 2024, giving rise to a decrease in professional fees (EUR -23.5 million). There is also a general focus on cost control and efficiency, which resulted in decreased IT costs (EUR -5.6 million) and stable other costs, despite the inflationary environment.

Depreciation and amortisation remained virtually stable at EUR 24.5 million.

In 2024, there was a net reversal of impairments of EUR 1.4 million compared to net recognition of impairments totalling EUR 16.0 million in 2023. The limited amounts in the P&L reflect the prudent lending policy Argenta has pursued for years.

Tax expense in financial year 2024 amounted to EUR 125.5 million. Deferred taxes are also included under this heading. In 2023, the effective tax rate was 27.9%, and in financial year 2024 it was 27.7%.



Climate risk

Information regarding risk policy and sustainability strategy is included in sections 4.1.4 and 6 of the integrated annual report.

The climate transition risk is included in the calculation of the expected credit losses (ECL) for the mortgage portfolios (retail). The customers who are regarded as the most sensitive to climate change and energy prices are placed in stage 2.

In the Belgian mortgage portfolio this happens on the basis of the EPC label in combination with a high DSTI (debt service to income ratio, an indicator of the share of income spent on repaying debts). In total EUR 371 million of outstanding receivables were moved to stage 2 with an ECL impact of EUR 0.25 million. For the Dutch mortgage portfolio this happens on the basis of the EPC label in combination with a high LTI (loan to income ratio, a measure by which the amount loaned is plotted against income). At year end EUR 972 million of outstanding receivables were moved to stage 2 with an ECL impact of EUR 1.3 million.

For the bullet loans in the Dutch mortgage portfolio, a maturity risk is calculated based on the projected property value. If a property is in a location with medium or high risk of flooding (chronic or acute), an additional haircut is applied, in which the projected value of the property is halved compared to properties where there is a low (or no) risk of flooding. This measure has an impact of EUR 0.7 million.

Climate risk, within a broader ESG framework, is integrated into the determination of the internal rating for non-retail counterparties and will impact the final ECL through the corresponding PD and staging. To date, there is no material impact of climate risk through this approach.

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Solid capital base and liquidity position (unaudited)

In the second quarter of 2024, a dividend of EUR 82.7 million was paid to shareholders, and a capital increase of EUR 55.0 million was then carried out. In the fourth quarter of 2024, an interim dividend of EUR 24.1 million was then paid. By adding the profit to the reserves, shareholders’ equity continued to grow and capital ratios remained healthy, as a result of which all solvency requirements were comfortably met. The liquidity ratios remained comfortable.

The Common Equity Tier 1 (CET1) ratio amounted to 28.7% as of 31 December 2024 compared with 22.4% as of 31 December 2023.

Argenta Assuranties comfortably met all the solvency requirements in 2024. The Solvency ratio at the end of 2024 was 196%, down from 230% at the end of 2023, due to a higher branch 23 market risk and limitation of the loss-absorbing capacity of deferred taxes to 10% of the solvency capital requirement (SCR).

The FICOD (Financial Conglomerates Directive) capital ratio amounted to 24.0% as of 31 December 2024 compared to 21.0% as of 31 December 2023.

Detailed disclosures on solvency and capital management can be found in section 4.2 of the integrated annual report.

Liquidity remained comfortable with an LCR (Liquidity Coverage Ratio) of 197% and an NSFR (Net Stable Funding Ratio) of 146% as of 31 December 2024 compared to 219% and 141% respectively as of 31 December 2023. Liquidity is further explained in Note 4.1.2.



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Consolidated balance sheet statement (before profit distribution)

Assets	Note	31/12/2023	31/12/2024
Cash and cash equivalents	7	62,600,333	66,244,880
Cash balances at central banks and other demand deposits	7	2,153,523,163	2,390,329,068
Financial assets held for trading	8, 25	63,051,701	28,431,717
Assets related to unit-linked insurance contracts (branch 23)	9	2,995,790,474	3,218,139,911
Non-trading financial assets mandatorily at fair value through profit or loss	10	106,229,924	107,829,888
Financial assets at fair value through other comprehensive income	11, 24	4,906,197,653	4,516,887,273
Financial assets at amortised cost	12	49,259,236,248	51,526,423,582
Derivatives used for hedging	13, 25	1,425,057,322	1,175,707,254
Fair value changes of the hedged items in portfolio hedge of interest rate risk	13	-1,245,442,292	-937,134,618
Assets under insurance contracts	18	0	3,037,654
Assets under reinsurance contracts	18	27,259,304	27,260,527
Investments in joint ventures and associates	14	4,523,865	4,625,325
Tangible assets	15, 23	64,333,143	68,345,819
Property, plant and equipment		63,482,377	67,503,756
Investment property		850,767	842,063
Intangible assets	16	23,389,257	20,086,005
Goodwill	16	98,150,460	98,150,460
Tax assets	17	101,957,932	107,574,525
Current tax assets		87,742,446	107,266,025
Deferred tax assets		14,215,485	308,500
Other assets	19	277,439,515	252,204,043
Total assets		60,323,298,001	62,674,143,315



Liabilities and equity	Note	31/12/2023	31/12/2024
Financial liabilities held for trading	8, 25	52,642,345	22,912,955
Liabilities related to unit-linked insurance contracts (branch 23)	9	2,995,790,474	3,218,139,911
Financial liabilities at amortised cost	20, 24	50,364,982,170	52,096,598,454
Deposits from central banks		0	0
Deposits from credit institutions		1,130,294,811	862,766,910
Deposits from counterparties other than central banks and credit institutions		42,421,463,560	43,678,738,881
Senior debt securities issued		6,727,324,493	7,461,999,198
Subordinated debt securities issued		0	0
Other financial liabilities		85,899,307	93,093,464
Derivatives used for hedging	13, 25	242,563,369	316,370,716
Fair value changes of the hedged items in portfolio hedge of interest rate risk	13	0	0
Liabilities under insurance contracts	18	2,683,342,397	2,824,567,144
Liabilities under reinsurance contracts	18	15,637,315	17,387,420
Provisions	21	12,631,215	14,577,761
Tax liabilities	17	49,757,779	40,098,567
Current tax liabilities		4,189,420	6,770,591
Deferred tax liabilities		45,568,359	33,327,976
Other liabilities	22	247,762,880	225,466,514
Total liabilities		56,665,109,944	58,776,119,443
Equity attributable to the owners of the parent	2	3,657,881,107	3,897,667,620
Equity attributable to minority interests	3	306,949	356,252
Total equity		3,658,188,057	3,898,023,873
Total liabilities and equity		60,323,298,001	62,674,143,315



Consolidated statement of profit or loss

	Note	31/12/2023	31/12/2024
Total operating income		927,961,613	918,049,933
Net interest income	26	823,932,569	777,455,106
Interest income		1,405,022,416	1,659,807,361
Interest expenses		-581,089,847	-882,352,255
Dividend income	27	8,249,479	8,029,915
Net fee and commission income	28	87,792,559	118,517,745
Fee and commission income		276,265,913	329,165,284
Fee and commission expenses		-188,473,355	-210,647,539
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	29	-300,617	3,096,306
Financial assets at fair value through other comprehensive income		-213,677	2,896,024
Financial assets and liabilities at amortised cost		-86,940	200,283
Gains or losses on financial assets and liabilities held for trading	30	-5,626,767	-2,121,663
Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss	31	5,070,350	7,900,663
Gains or losses from hedge accounting	32	-5,634,523	-1,669,073
Gains or losses on the derecognition of non-financial assets	33	-363,084	-10,920
Insurance service result	18	25,283,426	29,794,525
Reinsurance service result	18	-1,321,353	-7,133,134
Insurance finance result	18	-24,639,413	-30,376,536
Net other operating income	34	15,518,988	14,567,000
Other operating income		17,502,878	15,780,410
Other operating expenses		-1,983,890	-1,213,411
Administrative expenses	35	-456,476,560	-441,895,146
Staff expenses		-119,918,329	-128,427,898
Other administrative expenses		-336,558,231	-313,467,248



	Note	31/12/2023	31/12/2024
Depreciation and amortisation	15, 16, 23	-25,116,570	-24,535,316
Property, plant and equipment		-13,174,731	-14,733,135
Investment property		-9,545	-9,509
Other intangible assets		-11,932,295	-9,792,673
Modification gains or losses		0	0
Provisions or reversal of provisions		-91,581	-535,273
Impairments or reversal of impairments	36	-16,023,084	1,425,967
Financial assets (debt securities) at fair value through other comprehensive income		-2,734,914	558,837
Financial assets at amortised cost		-13,288,170	867,130
Goodwill		0	0
Property, plant and equipment		0	0
Share in results of associates and joint ventures		35,019	101,460
Profit or loss before tax		430,288,837	452,611,626
Tax expense	37	-120,259,714	-125,506,557
Profit or loss after tax		310,029,123	327,105,069
Profit or loss attributable to owners of the parent		309,845,524	326,890,305
Profit or loss attributable to minority interests		183,599	214,764



Consolidated statement of comprehensive income

Note 2 provides further information on changes to the various equity items.

Statement of profit or loss and other comprehensive income	Note	31/12/2023	31/12/2024
Profit or loss		310,029,123	327,105,069
Profit or loss attributable to owners of the parent		309,845,524	326,890,305
Profit or loss attributable to minority interests		183,599	214,764
Items that will not be reclassified to profit or loss		3,289,529	-18,841,493
Equity instruments at fair value through other comprehensive income	11	7,629,201	-15,926,936
Valuation gains or losses taken to equity		8,093,746	-17,674,125
Deferred taxes		-464,546	1,747,189
Actuarial gains or losses on defined benefit pension plans	21	-4,339,672	-2,914,557
Gross actuarial gains or losses on defined benefit pension plans		-5,792,246	-3,892,132
Deferred taxes		1,452,574	977,575
Items that may be reclassified to profit or loss		-34,820,787	-16,351,826
Debt securities at fair value through other comprehensive income	11	97,425,912	47,987,680
Valuation gains or losses taken to equity		126,952,853	68,768,852
Transferred to profit or loss		2,948,361	-4,785,279
Deferred taxes		-32,475,303	-15,995,893
Insurance contracts	18	-132,308,707	-63,003,698
Valuation gains or losses taken to equity		-176,411,609	-84,004,931
Deferred taxes		44,102,902	21,001,233
Reinsurance contracts	18	62,008	-1,335,808
Valuation gains or losses taken to equity		82,677	-1,781,077
Deferred taxes		-20,669	445,269
Total other comprehensive income		-31,531,259	-35,193,319
Comprehensive income		278,497,865	291,911,750
Comprehensive income attributable to the owners of the parent		278,314,219	291,697,160
Comprehensive income attributable to minority interests		183,646	214,590



Consolidated statement of changes in equity

	Accumulated other comprehensive income										
	Paid up capital	Share premium	Fair value changes of debt securities measured at fair value through other comprehensive income	Fair value changes of equity instruments measured at fair value through other comprehensive income	(Re)insurance contracts	Actuarial gains or losses on defined benefit pension plans	Reserves	Profit or loss attributable to owners of the parent	Equity attributable to the owners of the parent	Minority interests	Total equity
Equity position 01/01/2023	717,884,700	447,749,558	-126,708,465	14,327,711	399,497,299	-1,865,338	1,791,057,356	254,262,798	3,496,205,619	287,479	3,496,493,098
Changes in classification as a result of the initial application of IFRS 17	0	0	-36,681,678	0	0	0	0	0	-36,681,678	-23	-36,681,701
Capital increase	11,929,900	37,295,253	0	0		0	0	0	49,225,153	0	49,225,153
Profit or loss	0	0	0	0		0	0	309,845,524	309,845,524	183,599	310,029,123
Dividends	0	0	0	0		0	-105,098,320	-24,083,882	-129,182,202	-164,602	-129,346,804
Valuation gains or losses taken to other comprehensive income	0	0	126,952,503	8,093,742	-176,328,823	-5,792,061	0	0	-47,074,639	60	-47,074,579
Other comprehensive income taken to profit or loss	0	0	2,948,360	0		0	0	0	2,948,360	1	2,948,361
Changes in deferred taxes	0	0	-32,475,215	-464,545	44,082,206	1,452,528	0	0	12,594,973	-14	12,594,958
Total other comprehensive income	0	0	97,425,648	7,629,197	-132,246,617	-4,339,534	0	0	-31,531,306	47	-31,531,260
Other changes	0	0	0	0		0	0	0	0	449	449
Transfer to reserves	0	0	0	-6,014,830		0	260,277,628	-254,262,798	0	0	0
Equity position 31/12/2023	729,814,600	485,044,811	-65,964,496	15,942,077	267,250,682	-6,204,872	1,946,236,665	285,761,642	3,657,881,110	306,949	3,658,188,059
Capital increase	12,388,600	42,583,335	0	0		0	0	0	54,971,935	0	54,971,935
Profit or loss	0	0	0	0		0	0	326,890,305	326,890,305	214,764	327,105,069
Dividends	0	0	0	0		0	-106,882,580	0	-106,882,580	-165,702	-107,048,282
Valuation gains or losses taken to other comprehensive income	0	0	68,768,675	-17,674,108	-85,785,955	-3,891,822	0	0	-38,583,210	-204	-38,583,413
Other comprehensive income taken to profit or loss	0	0	-4,785,254	0		0	0	0	-4,785,254	-25	-4,785,279
Changes in deferred taxes	0	0	-15,995,855	1,747,188	21,446,489	977,498	0	0	8,175,319	54	8,175,373
Total other comprehensive income	0	0	47,987,566	-15,926,920	-64,339,466	-2,914,325	0	0	-35,193,145	-174	-35,193,319
Other changes	0	0	-2	0		-2	-1	0	-5	416	411
Transfer to reserves	0	0	0	-63,885		0	285,825,527	-285,761,642	0	0	0
Equity position 31/12/2024	742,203,200	527,628,146	-17,976,932	-48,727	202,911,216	-9,119,198	2,125,179,611	326,890,305	3,897,667,620	356,253	3,898,023,873

Notes 2, 3, 11, 18 and 21 provide further information on the changes to the various equity items.

Consolidated cash flow statement

	31/12/2023	31/12/2024
Cash and cash equivalents at the start of the period	3,290,309,755	2,344,603,437
Operating activities		
Profit or loss before tax	430,288,837	452,611,626
Adjustments for:		
Depreciation and amortisation	17,789,943	16,368,949
Provisions or reversal of provisions	91,581	535,273
Gains or losses on the derecognition of non-financial assets	363,084	10,920
Impairments or reversal of impairments	16,023,084	-1,425,967
Changes in assets and liabilities from hedging derivatives and hedged items	61,340,654	55,730,737
Interest expenses from financing activities	137,292,762	146,687,764
Other adjustments	19,040,069	19,108,770
Cash flows from operating profits before changes in operating assets and liabilities	682,230,015	689,628,072
Changes in operating assets (excluding cash and cash equivalents)		
Financial assets held for trading	44,534,216	34,619,983
Financial assets related to unit-linked insurance contracts (branch 23)	-241,098,304	-222,349,437
Financial assets at amortised cost	-1,188,472,820	-2,257,476,668
Financial assets at fair value through other comprehensive income	-204,550,454	421,929,960
Non-trading financial assets mandatorily at fair value through profit or loss	-8,892,107	-1,599,964
Assets under insurance contracts	0	-3,037,654
Assets under reinsurance contracts	-6,053,041	-1,222
Other assets	16,914,130	39,142,457
Changes in operating liabilities (excluding cash and cash equivalents)		
Deposits from central banks	0	0
Deposits from credit institutions	-655,905,408	-267,527,901
Deposits from other counterparties than central banks and credit institutions	606,890,460	1,257,275,322
Debt securities issued, retail	0	0
Financial liabilities held for trading	-38,907,449	-29,729,390
Financial liabilities related to unit-linked insurance contracts (branch 23)	241,098,304	222,349,437
Liabilities under insurance contracts	4,469,815	78,221,049
Liabilities under reinsurance contracts	1,685,231	414,298



	31/12/2023	31/12/2024
Other liabilities	-87,081,956	-36,040,033
(Paid)/refunded income taxes	-152,063,968	-142,448,965
Net cash flow from operating activities	-985,203,336	-216,630,655
Investing activities		
Cash payments to acquire property, plant and equipment	-3,828,711	-5,697,099
Cash proceeds from disposal of property, plant and equipment	107,495	175,396
Cash payments to acquire intangible assets	-4,526,517	-6,476,322
Cash proceeds from disposal of intangible assets	313,096	-13,100
Changes concerning consolidated companies	0	0
Net cash flow from investing activities	-7,934,638	-12,011,124
Financing activities		
Dividends paid	-129,347,288	-106,882,580
Cash proceeds from a capital increase	49,225,153	54,971,935
Cash proceeds from the issue of senior debt securities	498,555,000	1,680,506,526
Cash repayments of senior debt securities	-233,708,450	-1,005,722,143
Interest expenses paid	-137,292,762	-146,687,764
Net cash flow from financing activities	47,431,653	476,185,974
Cash and cash equivalents at the end of the period	2,344,603,437	2,592,147,632
Components of cash and cash equivalents		
Cash	62,600,333	66,244,880
Cash balances at central banks	1,950,858,245	2,246,823,228
Cash balances at other credit institutions	331,144,859	279,079,523
Other advances	0	0
Total cash and cash equivalents at the end of the period	2,344,603,437	2,592,147,631
Cash flow from operating activities:		
Interest income received	1,405,022,416	1,651,523,359
Dividends received	8,249,479	8,029,915
Interest expenses paid	-581,089,847	-679,836,354
Cash payments resulting from lease liabilities	-7,635,839	-8,581,320
Payments for leases that fall under the valuation exemptions for leases (low value and short term)	-312,929	-403,885
Cash flow from financing activities:		
Interest expenses paid	-137,292,762	-146,687,764

For the preparation of the consolidated cash flow statement the indirect method is applied.



Components of cash and cash equivalents

The cash, cash balances at central banks and at other credit institutions can be found under the balance sheet item “Cash, cash balances at central banks and other demand deposits”.

Cash flows from operating and financing activities

In note 24, further clarification is provided regarding the interest received and paid, and in note 25, further information is included regarding the dividends received.



Notes

1. Accounting policies

The consolidated financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS), including the interpretations issued by the IFRS Interpretation Committee (IFRIC), which have been adopted by the European Union. As such, the rules on hedging transactions are still accounted for in accordance with IAS 39 “carve out”). The consolidated financial statements are prepared on a going concern basis.

1.1. Changes in accounting policies

The accounting policies used for preparing the consolidated financial statements of 2024 are consistent with those applied on 31 December 2023.

The following standards and interpretations became applicable during the past financial year 2024:

■ Amendments to IAS 1 Presentation of Financial Statements:

- Classification of liabilities as current and non-current, issued on 23 January 2020, clarifies a criterion in IAS 1 for the classification of a liability as non-current: it requires that an entity has the right to defer the settlement of the obligation until at least 12 months after the reporting period. The amendments: (i) specify that the right of an entity to defer settlement at the end of the reporting period must exist; (ii) clarify that the classification is not affected by the intentions or expectations of the management about whether the entity will exercise its right to defer settlement; (iii) clarify how loan conditions affect the classification; and (iv) include a clarification of the requirements for the classification of liabilities that an entity will or can settle by issuing its own equity instruments.
- Classification of liabilities as current and non-current, issued on 15 July 2020, in which the start date of the above amendments was deferred by one year.
- Non-current liabilities with covenants, issued on 31 October 2022, specifies that covenants (i.e. conditions specified in a loan agreement) that must be met after the reporting period have no bearing on the classification of a liability as current or non-current at the end of the reporting period. Instead an entity is obliged to enter information about these covenants in the notes to the financial statements.

All the amendments apply to financial years beginning on or after 1 January 2024.

- Amendments to IFRS 16 Leases: Lease Liability in a Sale and Leaseback, issued on 22 September 2022, introduces a new model that will have an effect on the way in which a vendor-lessee processes variable lease payments in a sale-and-leaseback transaction. Under this new model, a vendor-lessee will: (i) enter estimated variable lease payments with the initial valuation of a lease liability in a sale-and-leaseback transaction; and (ii) then apply the general rules for the subsequent processing of the lease liability, so that no profit or loss is entered with regard to the right of use that it retains. These amendments will not change the processing of other leases, which have not arisen as a result of a sale-and-leaseback transaction. The amendments apply retrospectively to financial years beginning on or after 1 January 2024.
- Amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures: financing agreements with suppliers, issued on 25 May 2023, introduce additional notes for entities concluding financing agreements with suppliers. The amendments apply to financial years beginning on or after 1 January 2024.

These new provisions had no material impact on the Company's results for 2024 or on its equity as of 31 December 2024 or on the presentation of its financial statements.



Several new standards and changes to existing standards apply for financial years beginning after 1 January 2024. The Company has not applied the new or amended standards early in preparing its consolidated financial statements:

- Amendments to IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability, issued on 15 August 2023, clarify whether (or not) a currency is convertible to another currency. When a currency is not convertible, the entity estimates a cash exchange rate. This estimate is designed to reflect the rate that would have applied on the date of the transaction in a regular exchange transaction between market participants given the prevailing economic conditions. The amendments do not contain any specific requirements for estimating a spot rate. As a result of the amendments, entities will have to provide new notes assessing the impact of using an estimated exchange rate on the financial statements. The amendments apply to financial years beginning on or after 1 January 2025, early application being allowed. These amendments have not yet been adopted by the EU.
- Amendments to classification and measurement of financial instruments – Amendments to IFRS 9 and IFRS 7, published on 30 May 2024, will address diversity in accounting practice by making the requirements more understandable and consistent. The amendments include:
 - Clarifications of the classification of financial assets with environmental, social and corporate governance (ESG) and similar features – ESG-linked features in loans could affect whether the loans are measured at amortised cost or fair value. To resolve any diversity, the amendments clarify how the contractual cash flows on such loans should be assessed.
 - Clarifications on the date at which a financial asset or liability is recognised. The IASB also decided to include an option that allows an entity to derecognise a financial liability in the balance sheet before the settlement date when specified criteria are met.

The IASB also introduced additional disclosure requirements to enhance transparency for investors regarding investments in equity instruments designated and accounted for at fair value through other comprehensive income and financial instruments with contingent features, for example features tied to ESG-linked targets. The amendments apply to financial years beginning on or after 1 January 2026, early application being allowed. These amendments have not yet been adopted by the EU.

- Annual Improvements to IFRS Accounting Standards – Volume 11, issued on 18 July 2024, includes clarifications, simplifications, corrections and changes aimed at improving the consistency of several IFRS Accounting Standards. The amended standards are:
 - IFRS 1 First-time Adoption of IFRS Standards;
 - IFRS 7 Financial Instruments: Disclosures and related guidance on the implementing IFRS 7;
 - IFRS 9 Financial Instruments;
 - IFRS 10 Consolidated Financial Statements; and
 - IAS 7 Statement of Cash Flows.

The amendments apply to financial years beginning on or after 1 January 2026, early adoption being allowed. These amendments have not yet been adopted by the EU.

- IFRS 18 Presentation and Disclosure in Financial Statements, issued on 9 April 2024, replaces IAS 1 Presentation of Financial Statements. The new standard introduces the following significant new requirements:
 - Entities are required to present all income and expense in the statement of profit or loss in five categories: operating, investing, financing, discontinued operations and income tax. Entities are also required to present the newly defined subtotal of operating profit. Entities' net profit will not change.
 - Performance measures defined by management are included in a single note in the financial statements.
 - Enhanced guidance is given on how to organise information in financial statements.

In addition, all entities are required to use the subtotal operating profit as the starting point for the cash flow statement when presenting operating cash flows using the indirect method. The standard applies to financial years beginning on or after 1 January 2027, early application being allowed. This standard has not yet been adopted by the EU.

- IFRS 19 Subsidiaries without Public Accountability: Disclosures, published on 9 May 2024, will allow eligible subsidiaries to apply IFRS standards with reduced disclosure requirements. A subsidiary can apply the new standard in its consolidated and separate financial statements, provided that at the reporting date:
 - it does not have public accountability; and
 - the parent company applies IFRS standards in preparing its consolidated financial statements.

The standard applies to financial years beginning on or after 1 January 2027, early application being allowed. This standard has not yet been adopted by the EU.



The Company also does not intend to apply the new or amended standards early and will apply all the foregoing standards, amendments to standards and interpretations upon their entry into force. At this moment, these amendments are not expected to have a material impact on the Company's consolidated financial statements. Based on preliminary findings, we do not expect a material impact on financial reporting. For the amendments included in IFRS 18, a thorough analysis will be initiated and carried out in 2025.

1.2. Implementation and impact of changes in accounting policies and estimates for financial reporting

The changes to standards and interpretations that became applicable during the past financial year 2024, or that do not yet apply to financial years ending on 31 December 2024 (and were not applied) have no significant impact on the results, equity or notes in the Company's consolidated financial statements. An in-depth analysis will be started in 2025 for the implementation of IFRS 18. Based on preliminary findings, we do not expect a material impact on financial reporting.

1.3. Accounting policies – valuation rules

Judgements and estimates

Preparing the consolidated financial statements requires management to make judgements and estimates that affect the valuation of assets and liabilities in the balance sheet, the valuation of income and expenses in the profit or loss statement and the information included in the notes. Management uses the information available at the time of preparing the consolidated financial statements to make these judgements and estimates. The actual outcomes can differ from these judgements and estimates and may have a material impact on the consolidated financial statements.

Judgements relate mainly to the following areas:

- Assessing the existence of control in structured entities (where there is no capital link with the Company);
- Assessing the business model and, consequently, classifying the financial instrument (see the note on financial assets and liabilities – classification and measurement after initial recognition of financial assets);
- Judging whether the contractual cash flows of the financial instrument involve only payments of principal and interest (see the note on financial assets and liabilities – classification and measurement after initial recognition of financial assets);
- Determining whether a market is active or inactive and the resulting hierarchical level to which the financial instrument is allocated (see the note on financial assets and liabilities – fair value of financial instruments);
- Assessing whether a significant increase in credit risk has taken place since the initial recognition based on which the financial instrument is allocated to a particular stage (see the note on financial assets and liabilities – impairment of financial assets – general model);
- The models and assumptions used to determine expected credit losses and to determine different economic scenarios and their respective weightings (see the note on financial assets and liabilities – impairments of financial assets – general model);
- An insurance contract evaluates the actuarial assumptions used (mortality, morbidity, duration, etc.), the directly attributable cash flows and the risk additions. For each type of insurance contract, the Company also makes an assessment of whether there is significant insurance risk, assessment for identification and classification into insurance portfolios and assessment and estimation of contract boundaries. Further information can be found in the note on technical provisions for (re)insurance contracts.

Estimates are mainly made in the following areas:

- Determining the useful life expectancy and residual value of property, plant and equipment and intangible assets (see the note on property, plant and equipment and intangible assets);
- Estimating the recoverable amount of financial assets in default to determine the impairment losses (see the note on financial assets and liabilities – impairments of financial assets – general model);
- Estimating future taxable profit for the measurement of deferred tax assets (see the note on income taxes);
- Estimating the recoverable amount of the cash flow-generating units for goodwill impairments (see the note on goodwill);
- Calculating the fair value of financial instruments measured at fair value that are not listed or are not listed on an active market (see the note on financial assets and liabilities – fair value of financial instruments);



- Actuarial estimates when measuring provisions for insurance contracts, reinsurance contracts and employee pension liabilities (see the note on employee benefits – long-term benefits) (see the note on technical provisions for (re)insurance contracts).

These judgements and estimates are disclosed in the corresponding sections of the valuation rules. However, the Company is of the opinion that the above judgements and estimates do not pose a significant risk of material adjustment in the valuation of the assets or liabilities for the upcoming financial year.

The current economic climate and the successive events (geopolitical tensions and conflicts, inflation surge and rising interest rate environment, climate risk) has led to increased estimation uncertainties.

The Company's methodology for modelling the expected credit losses is sensitive to the inherent level of estimation uncertainty with regard to the modelling of macroeconomic forecasts. Note 36 gives further explanation of the amendments to the selection and the probability weighting of macroeconomic forecasts. Sensitivity analyses relating to credit loss provisions are also presented below.

Operating segments

An operating segment is a part of the Company:

- That conducts business activities that generate revenue and costs;
- The results of which are regularly assessed separately by management;
- For which separate financial information is available.

The management of the Company is considered to be the chief operating decision maker that makes important operational decisions.

The operating segments derive from the operating activities and the economic environments in which the Company operates and are best represented by the following segments:

- Business activities consisting of the Bank Pool and Insurance Pool;
- Economic activities in Belgium, the Netherlands and Luxembourg.

This segmentation follows the internal reporting. Transactions or transfers between segments take place on the basis of the usual commercial conditions that also apply to unrelated parties ("arm's length basis").



Consolidation

Scope of consolidation

The consolidated financial statements include all companies over which the Company exercises exclusive or joint control or over which the Company exercises significant influence.

All companies included in the consolidated financial statements of the Company end their financial year on 31 December. This closing date corresponds to the closing date for the preparation of the consolidated financial statements.

Subsidiaries

Subsidiaries are companies in which the Company has direct or indirect exclusive control. Control exists when the Company is exposed to, or has rights to, variable returns from the participating interest and it has the ability to influence those returns through its control over the participating interest.

The Company exercises control if it directly or indirectly holds a majority of the voting rights (and there are no contractual provisions modifying those rights) or if by contractual agreement the Company has the power to direct the relevant activities, and when these rights are material. A right is material if the holder has the practical ability to exercise that right. The existence of control is reassessed if changes occur in elements that determine control.

Subsidiaries are fully consolidated as of the date on which effective control is obtained and are no longer consolidated as of the date on which effective control ends. Intra-group transactions and balances, and results from transactions between the companies included in the consolidation, are eliminated. Before proceeding to consolidate the subsidiaries, the measurement rules of the subsidiaries have been adjusted to align them with the measurement rules applicable in the Company.

In the event of loss of control of a subsidiary, the gain or loss on the disposal is determined as the difference between:

- The sum of the fair value of the consideration received and the fair value of the remaining investment held by the Company;
- The carrying amount of the assets (including goodwill) and the liabilities of the subsidiary and minority interests.

Structured undertakings

Structured undertakings are undertakings that are set up in such a way that they are not managed by voting rights. The management of the main activities is regulated by contractual agreements and the powers of the voting rights are limited to making administrative decisions.

The determination of control over structured undertakings takes into account the purpose and design of the undertaking, the ability to direct the relevant activities and the extent to which the Company is exposed to the variability of the risks and rewards of the undertaking.



Financial assets and liabilities

Recognition and initial measurement

Financial assets or liabilities are recognised in the balance sheet as soon as the Company becomes party to the contractual terms of the instrument. Purchases of financial assets settled according to standard market conventions are recognised in the balance sheet at settlement date.

Financial assets and liabilities are initially measured at fair value adjusted for any transaction directly attributable to the acquisition or issue of the financial instrument. Transaction costs for financial assets and liabilities measured at fair value through profit or loss are immediately recognised in the statement of profit or loss.

Classification and measurement of financial assets subsequent to initial recognition

The classification and measurement of the financial assets depends on the type of financial instrument and is based on both the business model and on the characteristics of the contractual cash flows of the financial assets (so-called “solely payments of principal and interest test” or “SPPI test”). For debt instruments, an irrevocable option exists to designate these as measured at fair value through profit or loss.

The categories for the measurement of financial assets are:

- Measured at amortised cost;
- Measured at fair value through other comprehensive income;
- Measured at fair value through profit or loss.

Business model

The possible business models for the control of financial assets are:

- The business model aimed at holding financial assets to collect the contractual cash flows (“hold-to-collect” or “HTC”);
- The business model aimed at holding financial assets to collect the contractual cash flows and to sell financial assets (“hold-to-collect-and-sell” or “HTC & S”);
- Other business models, such as holding financial assets for trading purposes and management based on fair value.

The financial assets are allocated internally within the Company to similar portfolios which are each assigned to a particular business model. Assignment to a business model takes into account how the performance and risks of the financial asset are tracked, assessed and reported, and experience and expectations with regard to selling. At the Company, there is no relationship between the business models and the remuneration of the managers and dividend policy. Any exceptional change in business model and subsequent reclassification of financial assets is handled and validated by the Asset Liability Committee (Alco).

Contractual cash flows test

The contractual cash flows test determines whether the cash flows of the financial asset consist solely of redemptions and interest payments on the principal amount outstanding, in accordance with the terms of a basic credit agreement. The interest payments contain compensation for the time value of money, the credit risk and any other risks and costs, and a commercial margin.

For financial assets that are contractually linked to cash flows from an underlying pool of financial instruments, and where the financial instrument is divided into tranches, a look-through approach is applied. In this case, the contract terms of the financial asset (tranche) and the characteristics of the underlying pool are subject to the contractual cash flows test and the credit risk of the tranche must be less than or equal to the credit risk associated with the underlying pool of financial instruments.



In applying this test, the Company takes into account, inter alia:

- Contract terms that change the timing or amount of contractual cash flows, including options for early redemption (taking into account early termination penalties) and extension, interest rate adjustments and variable interest rate features;
- The analysis of the magnitude of the difference between the frequency of the interest rate review and the fixed interest period of variable-rate financial assets when these do not match;
- Conditions that limit the Company's recourse to the cash flows of the specific underlying assets ("non-recourse" characteristics).

Financial assets at amortised cost

Debt instruments held in a business model that is designed to receive contractual cash flows and where the contractual cash flows consist solely of repayments and interest payments on the principal outstanding, and where the Company has not opted for designation as measured at fair value through profit or loss, are measured, after initial recognition, at amortised cost.

Debt instruments that are sold to a securitisation vehicle included in the Company's consolidation may continue to be classified under a business model designed to receive contractual cash flows.

Sales can be compatible with the hold-to-collect business model if:

- The sales take place shortly before maturity in an amount that approximates the remaining contractual cash flows;
- The sales are made as a result of an increase in credit risk;
- The sales relate to the investment policy (e.g. sustainability criteria);
- The sales are not significant in value or are infrequent;
- The sales are significant but infrequent.

Amortised cost is the amount at which the instrument is recognised at initial measurement, less principal payments and adjusted for cumulative amortisation, using the effective interest method, of the difference between the initial measurement amount and the repayment amount. From initial recognition onwards, expected credit losses are recognised in the statement of profit or loss. The interest is included in the statement of profit or loss on the basis of the effective interest rate determined at the start of the contract.

Financial assets at fair value through other comprehensive income

Debt instruments held in a business model that is intended both for collecting contractual cash flows and selling debt instruments and where the contractual cash flows consist exclusively of redemptions and interest payments on the outstanding principal, are measured, after initial recognition, at fair value through other comprehensive income. This is applicable provided that the Company has not opted to designate them as measured at fair value through profit or loss.

After recognition, these debt instruments are measured at fair value, with adjustments in fair value included in a specific heading in other comprehensive income in equity. The interest is taken into profit or loss on the basis of the effective interest rate in the same way as for financial assets measured at amortised cost. Expected credit losses are recognised in other comprehensive income through the statement of profit or loss. Upon sale, the cumulative fair value changes previously recognised in other comprehensive income are transferred to the statement of profit or loss.

For equity instruments in the form of shares not held for trading, it is possible to opt irrevocably to measure these on initial recognition at fair value on an individual basis, with value adjustments recognised in (a specific heading of) other comprehensive income. Upon sale of the shares, the cumulative fair value adjustments previously recognised in other comprehensive income are transferred, not to the statement of profit or loss, but to the results carried forward. Dividends are recognised in the statement of profit or loss where they form consideration for the investment. No impairment losses should be recognised on these instruments.

Financial assets measured at fair value through profit or loss

Financial assets measured, after initial recognition, at fair value through profit or loss include debt instruments, equity instruments and derivatives that are not designated as hedging instruments. Derivatives are dealt with in the note on financial assets and liabilities – derivatives.



Debt instruments designated as measured at fair value through profit or loss are debt instruments for which the Company has made the irrevocable choice to designate these as measured at fair value through profit or loss. These are debt instruments that meet the criteria of the business model to collect and/or sell contractual cash flows and also pass the cash flows test. If the other measurement methods for these instruments give rise to inconsistencies in measurement (accounting mismatch), the Company may apply this option.

Debt instruments required to be measured at fair value through profit or loss include debt instruments that do not meet the contractual cash flow test.

After initial recognition, these debt instruments are measured at fair value and changes in fair value and realised results are recognised under a specific heading in the statement of profit or loss. The interest is recognised in net interest income on the basis of the effective interest rate.

Equity instruments measured at fair value through profit or loss consist of investments in equity instruments for which, upon initial recognition, no irrevocable election was made to measure them at fair value through other comprehensive income. Comprehensive income as a result of remeasurement to fair value is included under a specific heading in the statement of profit or loss. Dividends are recognised in the statement of profit or loss where they form consideration for the investment.

Classification and measurement of financial liabilities subsequent to initial recognition

The categories for the measurement of financial liabilities are:

- Measured at amortised cost;
- Measured at fair value through profit or loss.

Financial liabilities at amortised cost

After initial recognition, these liabilities are measured at amortised cost, and the difference between the initial measurement and the repayment amount is periodically recognised in net interest income using the effective interest method.

Financial liabilities at fair value through profit or loss

Financial liabilities held for trading are intended to generate short-term profits, and also include derivatives that are not designated as hedging instruments. Derivatives are dealt with in the note on financial assets and liabilities – derivatives.

For financial liabilities designated as measured at fair value through profit or loss for which the Company has made the irrevocable election to designate these as measured at fair value through profit or loss, this irrevocable election can be applied whenever:

- The use of the option eliminates or significantly reduces an inconsistency in the measurement (accounting mismatch);
- The financial liability contains one or more embedded derivatives and it is permitted to designate the entire financial instrument as measured at fair value through profit or loss.

After initial recognition, these financial liabilities are measured at fair value, and changes in fair value and realised results are recognised under a specific heading in the statement of profit or loss. The interest is recognised in net interest income on the basis of the effective interest rate.



Derecognition of financial assets and liabilities

Derecognition of financial assets

Financial assets are no longer recognised when the contractual rights to the cash flows from the financial asset expire or when the contractual rights to the cash flows and substantially all risks and rewards of ownership are transferred. Where these conditions are not met, the financial asset is retained on the balance sheet and a liability is recognised to account for the ensuing liability. Sales of financial assets settled according to standard market conventions are derecognised from the balance sheet at settlement date.

Derecognition of financial liabilities

Financial liabilities are no longer recognised when the liability has been extinguished (when the contractual obligation has been fulfilled, the contract is terminated or the contract expires).

Contract modifications

In the event of a change in the contractual terms of the cash flows of a financial asset that does not lead to the derecognition of the financial asset, a modification gain or loss is recognised in the statement of profit or loss. When there is a significant change in the contractual terms and conditions for financial liabilities, being a difference of more than 10% between the present value of the original cash flows and the present value of the modified cash flows, discounted at the original effective interest rate, then the financial liability is derecognised. If the terms and conditions change during the term of a financial asset, the new terms and conditions are examined to see if they differ significantly from the original terms and conditions or if the change means that the original rights to collect the cash flows from the instrument have elapsed. If one of the two conditions is met, the financial asset will be derecognised.

Sale and repurchase agreements and securities lending

Securities (debt instruments and equity instruments) subject to a repurchase agreement (repo) remain on the Company's balance sheet. The corresponding liability resulting from the commitment to repurchase the securities, is recorded in financial liabilities at amortised cost – deposits. The asset value of the securities is recognised in the off-balance sheet as pledged collateral.

Securities sold under a linked sales agreement ("reverse repo") are recognised off-balance sheet as securities received as collateral. The corresponding receivable is recorded under financial assets at amortised cost – loans and advances.

The difference between the sale and the repurchase price is recorded in the interest result over the term of the agreement using the effective interest method.

Securities that are lent out remain on the balance sheet. Borrowed securities are not included in the balance sheet. Securities lending commissions are included under fee and commission income and expenses.

Impairment losses on financial assets

The impairment model is based on expected credit losses and is applied to debt instruments measured at amortised cost or debt instruments measured at fair value through other comprehensive income. Impairment losses are also recognised on loan commitments and financial guarantee contracts that are not measured at fair value through profit or loss, with a provision recorded for expected losses. No impairment losses are recorded on investments in equity instruments.

General model

The calculation of impairment losses is based on a two-step model:

- Step 1 consists of allocating the financial asset to the appropriate stage, corresponding to a specific situation with respect to the evolution of the counterparty's credit risk since initial recognition of the instrument;
- Step 2 consists of calculating the expected credit losses per instrument.



The allocation to the appropriate stage is determined by comparing the evolution to the previous reporting period. A financial asset can change stage in both directions.

The different stages and the resulting calculation method for impairments are:

- Performing financial assets (performing – stage 1): these are financial assets not classified in stages 2 and 3, on which expected credit losses within 12 months are recognised (expected credit losses from potential defaults within 12 months of reporting date);
- Performing financial assets with reduced creditworthiness (underperforming – stage 2): these are financial assets, of which the credit risk has significantly increased since creation or purchase. For these assets, expected credit losses are recognised for the entire term (expected credit losses arising from defaults over the entire remaining expected term after reporting date);
- Non-performing financial assets with reduced creditworthiness (non-performing – stage 3): these are financial assets for which objective evidence exists that they are in default and on which impairment losses are recognised equal to expected credit losses over the term of the asset.

A significant increase in credit risk is based on both quantitative and qualitative factors.

The expected credit losses for stages 1 and 2 and for stage 3 for Belgian mortgage receivables are calculated on the basis of a probability-weighted average for a number of scenarios, which take into account information about past events, current circumstances and estimates of future economic conditions. This forward-looking information makes use of the macroeconomic budget projections. Additional staging criteria, model adjustments and management overlays may also be added to cover the model risk and uncertainties inherent in budget projections and estimates of forward-looking information.



The expected credit losses for stage 1 and stage 2 are calculated as the difference between the gross carrying amount of the financial asset and the value of the (discounted) estimated future cash flows. The calculated expected credit losses are recognised as impairment losses in the statement of profit or loss. The estimated future cash flows take into account the contractual cash flows and contract terms that may change the cash flows (such as prepayment or extension options) and expected cash flow shortfalls, taking into account collateral values and other forms of credit protection.

Further detail can be found in Note 4.1.3 Credit risk – expected credit losses (ECL) (stage 1 and stage 2).

Definition of default

The definition of default is aligned with the definition applied for internal credit risk management and meets the requirements of the CRR default definition. The Company treats “non-performing” and “default” in an identical manner.

Default status is assigned to financial assets that meet at least one of the following criteria:

- The financial asset is more than 90 consecutive days in arrears;
- The Company has knowledge of factors indicating that repayment is unlikely.

The arrears include outstanding capital, past due interest and related costs (such as late payment interest, fines, fees). The day count of arrears takes into account the materiality thresholds from the CRR regulations.

UTP (unlikely to pay) indicators showing that repayment is unlikely are recorded at an individual debtor level. The Company makes a distinction between:

- Indicators that immediately lead to a registration of default;
- Indicators that lead to manual assessment by a credit manager, potentially resulting in default registration.

The granting of forbearance measures leads to the registration of default in the following cases in the CRR regulation, in particular:

- If the ratio of the difference between the present value of the contractual cash flows before and after forbearance measures, discounted at the original effective interest rate, is greater than 1%;
- When granting a second forbearance measure;
- In the event of an arrears of more than 30 consecutive days for a performing financial asset to which a forbearance measure is applicable.

When a significant portion (more than 20%) of the debtor's total outstanding debt is classified as in default, the Company considers it unlikely that the debtor will fully meet other obligations. Consequently, all financial assets of this debtor will also be classified as in default ("pull through effect").

If the criteria for classifying the financial asset as being in default no longer apply, the financial asset may be cured, provided that no new criteria for classifying the financial asset as being in default are identified during the probation period of at least 3 months.

If the conditions for curing are violated during the probation period, a new period of at least 3 months will start. For financial assets in default due to forbearance measures, the probation period is 12 months.

Further details can be found in Note 4.1.3 Credit risk – default, non-performing and credit-impaired (stage 3).

Recognition of impairment losses

For financial assets at amortised cost, the impairment losses are recognised in the balance sheet as corrections deducted from the gross carrying amount. For financial assets at fair value through other comprehensive income, the impairment losses are recognised in other comprehensive income and are not deducted from the gross carrying amount on the asset side of the balance sheet. Additions, reversals and applications of impairment losses are included in the statement of profit or loss under a separate heading.

Impairment losses on loan commitments and financial guarantee contracts that are not measured at fair value through profit or loss are recognised in the balance sheet as provisions and the movements are recognised in the statement of profit or loss under provisions or reversal of provisions.

Write-offs

Debt instruments are written off when they meet certain conditions. The Company always writes off the entire financial asset (and does not make use of partial write-off). For this, the financial asset must be classified under stage 3. The write-off of the financial asset and the application of the already-recognised impairment loss are recognised in the statement of profit or loss in impairment losses.

As a general rule, debt instruments are written off when all reasonable recourse options have been exhausted and no significant recovery is expected.



More specifically, for Belgian mortgage receivables, the following conditions are followed for write-off:

- The mortgage receivable has been called, and the real estate collateral has already been sold. The proceeds from this sale have been collected for the most part or no proceeds have been collected from the sale because the Company's receivable is subordinated to that of other creditors;
- The borrower is in a state of bankruptcy or the property serving as collateral for the receivable was sold as part of collective debt restructuring procedures and the greater part of the funds from the sale were received;
- The procedural costs involved in enforcing the guarantee are out of proportion with the possible benefits, as a result of which the guarantee cannot be sold.

For the Dutch portfolio, mortgage receivables are written off if, after enforcement of all the guarantees present, a residual debt remains and no further recovery options are expected.

For writing off a mortgage without collateral or instalment loans the following criteria apply:

- The loan has been called and for not more than two years action has been taken to recover the outstanding amount, with the loan being written off no later than two years after this date, or;
- The borrower has been admitted to collective debt restructuring procedures or is in a state of bankruptcy or fraud has been found.

Cash credits, overdrafts on current accounts and loans and debt securities without collateral are written off when an individual assessment (case-by-case) provides no further reasonable expectation of recovery of the outstanding receivable.

If, for loans that have been written off according to the above criteria, payments or recoveries are received by the Company at a later date, these are recognised as income in the profit or loss statement in the category impairment losses.



Derivatives

Recognition and Measurement

Derivatives are, at initial recognition and thereafter, measured at fair value through profit or loss. The fair value is measured using valuation techniques.

Derivatives are recognised as financial assets when their fair value is positive and as liabilities when their fair value is negative. Interest received and paid is included in the interest result for hedging derivatives.

Derivatives held for trading

Derivatives that are not designated as hedging instruments are recognised as held for trading.

For a hybrid contract that is a financial liability, a lease receivable, an insurance contract or other non-financial contract, it is necessary to assess whether elements embedded in the contract should be separated from the base contract. This is the case when:

- The features and risks of the embedded elements do not closely match those of the base contract;
- The entire hybrid contract is not measured at fair value through profit or loss;
- A separate instrument with the same terms and conditions as the embedded element in the contract would meet the definition of a derivative.

Embedded derivatives separated from hybrid contracts are classified as derivatives held-for-trading. Derivatives held for trading are included under financial assets or liabilities held for trading, and changes in fair value and realised gains and losses are recognised in gains and losses on financial assets and liabilities held for trading.

Hedging derivatives

The Company uses the option to continue to apply the requirements and conditions of IAS 39 on hedging transactions, as endorsed by the European Union ("carve out").

Derivatives entered into as part of a hedging relationship are classified according to the purpose of the hedging:

- Fair value hedges serve to hedge the risk of changes in the fair value of a financial asset or liability, or in the interest rate risk of a portfolio;
- Cash flow hedges serve to hedge the possible variability in cash flows of a financial asset or liability.

Currently, the Company only has hedging derivatives as part of fair value hedges.

The conditions to qualify as a hedging instrument are:

- The presence of formal documentation of the hedging relationship (with identification of the hedging instrument, the hedged item and the hedging objective) at the outset of the hedge;
- The expectation that the hedge will be highly effective and the ability to measure the hedging effectiveness in a reliable way;
- Continuous measurement during the reported period in which the hedge can be designated as effective.

Fair value hedges

In fair value hedges, the derivatives are recognised under hedging derivatives as assets or liabilities, with changes in fair value recognised in gains and losses from the recognition of hedging transactions together with the corresponding change in the fair value of the hedged risk of the hedged assets or liabilities.



The Company applies the carve-out version of IAS 39. In this way no ineffectiveness arises owing to unexpected levels of prepayments, as long as under-hedging exists.

Termination of hedging transaction

If the hedging transaction no longer meets the conditions or if the hedging is terminated, the hedging instrument is transferred to derivatives held for trading.

In the case of a fair value hedge of an identified fixed-income financial instrument (micro fair value hedge), the revaluation adjustment of the hedged instrument is amortised over the remaining life of the instrument based on the effective interest rate. In the case of the fair value hedge of a portfolio of fixed-income instruments (macro fair value hedge), the revaluation adjustment is amortised on a straight-line basis over the remaining term of the original hedge. When the hedging instrument is no longer recorded in the balance sheet (owing to prepayment or sale), the revaluation adjustment is immediately recognised in the statement of profit or loss.

In the case of a cash flow hedge, the revaluation adjustment remains in other comprehensive income until the originally hedged instrument impacts the statement of profit or loss or until it is clear that the transaction will not take place. At that time, the revaluation adjustment is recognised in the statement of profit or loss.

Fair value of financial instruments

The fair value is the price that would be received/paid for the sale of an asset or for the transfer of a liability in an "orderly" transaction between market participants at the date of measurement.

The Company uses the following hierarchy for determining the fair value of financial instruments:

- Quoted prices in an active market;
- The use of valuation techniques.

The fair value of a financial instrument is measured on the basis of quoted prices in active markets. Where there is no active market available for the financial instrument, the fair value is measured using valuation techniques.

These valuation techniques make maximum use of market inputs, but are influenced by assumptions, such as risk spreads and accounting estimates of future cash flows.

In the rare case where it is not possible to determine the fair value of an unlisted equity instrument, it is recognised at cost.

Interest income and expenses

Interest income and interest expenses are recognised in the statement of profit or loss on a pro rata basis based on the effective interest method.

The effective interest rate is the interest rate that exactly discounts the expected future cash flows (taking into account contractual payments and including transaction costs and commissions and fees paid and received and other forms of compensation that form an integral part of the effective interest rate) over the expected life of the financial instrument or, if more appropriate, over a shorter period, to the net carrying amount. Commissions and fees that form an integral part of the effective interest rate include, inter alia, commissions received for the creation or acquisition of a financial asset, or commissions paid for the issue of financial liabilities.

Transaction costs, commissions and fees are treated as an additional component of interest and are included in the effective interest rate and are recognised in net interest income.

For derivatives and debt instruments held for trading, the Company opts for the recognition of the interest received and paid under net interest income.

Goodwill

Goodwill represents the difference between the cost of acquiring a business combination and the acquiree's share in the fair value of the identifiable assets, liabilities and contingent liabilities acquired. It is determined as of the date of acquisition.

Where this difference is negative (badwill), it is immediately recognised as income in the statement of profit or loss. Where the difference is positive, it is recognised as an asset and measured at cost less any impairment losses. Goodwill is not amortised, but is tested at least once a year for impairment.

The Company allocates the goodwill to cash-generating units or groups. Impairment losses are recognised on goodwill whenever the carrying amount of the cash-generating unit to which the goodwill belongs exceeds its recoverable amount. The recoverable amount is the higher of (i) the fair value less costs of disposal and (ii) its value in use. The value in use is the present value of estimated future cash flows that are expected to arise from the cash-generating unit. Impairment losses on goodwill cannot be reversed.

Leases

For each contract, the Company assesses whether the contract is or contains a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

The Company acts as a lessee in leases for the rental of equipment or real estate and as a lessor in subleases of real estate to its tied agents.



Lessee

At the commencement date of the contract, the Company recognises a right-of-use asset and a lease liability. The right-of-use asset is measured at cost on initial recognition. The cost price consists of:

- The amount of the initial measurement of the lease liability;
- The amount of the lease payments made before the commencement date (which are not included in the lease liability);
- The initial direct costs;
- The estimated costs of dismantling, removal and repair (if applicable).

The lease liability is measured at the present value of the lease payments (not yet made). The lease payments are discounted using the interest rate implicit in the lease, provided it can be easily determined. Where it cannot be easily determined, the marginal interest rate is used.

The right-of-use asset is recognised and measured correspondingly in property, plant and equipment.

After initial recognition the lease liability is recognised as borrowings, with the interest payments recognised using the effective interest method. Modifications or reassessments of the lease liability are recognised when determined and result in the revaluation of the lease liability and the adjustment of the right-of-use asset. If the right-of-use asset no longer has a carrying amount and the remeasurement involves a reduction in the lease liability, the remeasurement is recognised in the statement of profit or loss.

Lessor

In a finance lease, the lessor transfers substantially all of the risks and rewards associated with ownership of an asset to the lessee. An operating lease is any lease that is not classified as a finance lease.

The income from an operating lease is recognised in the statement of profit or loss on a straight-line basis over the lease term. The underlying asset is recorded using the measurement rules applicable to the underlying property, plant and equipment.

For finance leases, a lease receivable is recorded, corresponding to the net investment in the lease. Interest income is recognised over the lease term using the implied interest rate of the lease. If the implicit interest rate of the sublease cannot be readily determined, the discount rate used for the head lease agreement may be applied to value the net investment in the sublease.

Commissions and fees received and paid

Commissions and fees received for services (excluding commissions that form part of effective interest) are recognised using the following five basic principles:

- Identification of the contract;
- Identification of the performance obligations in the contract;
- Determination of the transaction price;
- Allocation of the transaction price to the performance obligations;
- Recognition of the income to the extent that the performance obligation is met.

The performance obligation is met when the control of the good or service is transferred.

The Company accounts for commissions and fees received for services:

- Progressively over the period, pro rata as the services are provided in the case of continuous services;
- When the service was performed.

Commissions and fees paid consist mainly of commissions to agents and are based on turnover volumes and production figures. Turnover commissions are progressively included in the statement of profit or loss over the period. Production commissions are included in the effective interest rate of the financial instrument.



Employee benefits

Post-employment benefits

The Company has both pension obligations for occupational pension schemes with defined contributions (“defined contribution schemes”) and pension schemes with targets to be achieved (“defined benefit schemes”). The Company finances the pension schemes through group insurance, whereby the insurer guarantees a return.

Defined contribution schemes

The Company’s contributions to defined contribution pension schemes are recognised as an expense in the statement of profit or loss during the year to which they relate.

Given their legally imposed minimum guaranteed return, Belgian defined contribution schemes are considered as defined benefit schemes and the liability is measured based on the methodology used for defined benefit schemes (the projected unit credit method).

Defined benefit schemes

For determining the defined benefit obligations, the Company determines the expected benefit at retirement date for each employee, taking into account the expected evolution of the salary and the likelihood of the employee leaving the scheme. The expected benefit at retirement date is then allocated on a linear basis to past service.

The present value of the gross liability is determined by discounting the defined benefit obligations based on the market return of high-quality corporate bonds.

The fair value of the insurance contracts is determined by the projection of the accumulated reserves, using the actual yields offered by the insurer, discounted on the basis of the market return of high-quality corporate bonds.

The amount recognised in the balance sheet in respect of the pension schemes is the difference between the present value of the gross liability and the fair value of the insurance contracts. If this difference results in an asset value, this is limited to the asset ceiling, which is equal to the present value of the economic benefits available to Argenta Group in the form of repayments or reduction of future contributions.

Revaluations of the net benefit obligations are included in other comprehensive income and are never transferred to the statement of profit or loss. Revaluations are the result of changes in actuarial assumptions, experience adjustments, return on scheme assets and changes in the asset ceiling.

Tax expense

Taxes on the profit of the financial year include both the current and the deferred taxes. These taxes are calculated in accordance with the tax laws that apply in each country where the enterprise operates.

Current taxes include taxes for the current period that are payable on the taxable income of the year, based on the tax rates in effect at the balance sheet date, as well as any revision of taxes payable (or refundable) for prior periods.

Deferred taxes are calculated on temporary taxable differences that exist between, on the one hand, the tax value of assets and liabilities and, on the other hand, their carrying amount in the financial statements, and unused carry forward tax losses.

These taxes are measured using the tax rates expected to be in effect at the time of the realisation of the assets or settlement of the liabilities to which they relate.

Deferred tax assets are only recognised if it is probable that there will be sufficient future taxable profit to offset the temporary differences and tax losses.



Deferred tax assets and liabilities are offset and presented net only if they relate to taxes levied by the same tax authority on the same taxable entity. Current and deferred taxes are recognised in the statement of profit or loss with the exception of those related to instruments, transactions or events that are measured directly in (comprehensive income in) equity. These are booked directly to equity.

Levies

Levies are outflows of economic benefits imposed by governments. The Company immediately recognises the levy in the statement of profit or loss as soon as the obligation arises.

Credit institutions are subject to various Belgian and European levies, such as the deposit and guarantee fund and the subscription tax. These contributions are established on 1 January of the calendar year and are therefore fully recognised in the statement of profit or loss on that date.

(Re)insurance contracts

Classification

A contract is classified as an insurance contract when the Company accepts significant insurance risk from a policyholder by agreeing to compensate the policyholder if a specified uncertain future event (the insured event) adversely affects the policyholder.

A reinsurance contract held is a contract under which the Company transfers a significant insurance risk relating to underlying insurance contracts to a reinsurer to mitigate the risk exposure.



Investment contracts without discretionary participation features (such as the unit-linked branch 23 contracts issued by the Company) and other contracts that have the legal form of an insurance contract but do not transfer significant insurance risk are classified and measured as financial instruments. Investment contracts with discretionary participation features (such as the branch 21 contracts issued by the Company) are measured in accordance with IFRS 17.

Combination and separation of components from insurance contracts

Before recognising and measuring insurance contracts, the Company first assesses whether:

- A set or series of (legal) contracts must be combined and recognised together for accounting purposes; and/or
- One or more components must be separated from the (legal) contract or from the combined (legal) contracts and accounted for separately.

The Company has not entered into a set or series of contracts that must be treated as a single contract for accounting purposes.

Components that may require separation are:

- Embedded derivatives that are not closely related;
- Distinct investment components; and
- Promises to transfer distinct goods or services other than insurance contract services to the policy holder.

The Company's contracts do not include embedded derivatives, nor do they include promises to transfer distinct goods or services to the policyholder.

Distinct investment components are defined as amounts that the Company must pay to a policyholder under the insurance contract in all circumstances, regardless of whether an insured event occurs. The branch 44 contracts underwritten by the Company are separated into two separate contracts because of the elements below, being a branch 21 component measured under IFRS 17 and a branch 23 component measured under IFRS 9:

- Knowledge about the investment component, if any, is not necessary to measure the insurance component;
- The investment component and the insurance component are not highly interdependent. This is the case when the policyholder is able to benefit from one component regardless of whether the other component is also present. The volume of switches between the two components is limited and expected to remain limited. In addition, for the branch 44 contracts, the contractual terms for each component are independently changeable. For example, the Company can change the applicable charges on the investment component without impacting the insurance component; and
- A contract with terms similar to those of the investment component is sold separately or can be sold separately.

Grouping of insurance contracts

For presentation and measurement purposes, insurance contracts are combined into portfolios and groups.

A portfolio of insurance contracts includes contracts that are subject to similar risks and that are managed together (which is assessed by considering how information is reported to the management of the Company). The Company identifies eighteen different portfolios, classified based on product.

Each portfolio is then divided into cohorts (per trimester of underwriting), with a distinction in classification being made between:

- Contracts that are onerous on initial recognition;
- Contracts that, at the time of initial recognition, have no significant possibility of becoming onerous later; and
- Other contracts, if applicable

This classification is made on the basis of fulfilment cash flows at initial recognition.

When a contract is underwritten, it is added to an existing group of contracts or, if the contract is not eligible for recognition in an existing group, it forms a new group to which future contracts can be added.

Insurance contracts that would fall into different groups only because law or regulation constrains the Company's practical ability to set a different price level or provide for differences in benefits for policyholders with different characteristics are included in the same group.

The reinsurance contracts are grouped on the basis of the risk of the underlying insurance contracts.

Insurance contracts

For insurance contracts, cash flows fall within the boundary of the contract if they arise from substantive rights and obligations that exist during the reporting period in which the Company can compel the policyholder to pay premiums or in which the Company has a substantive obligation to provide the policyholder with services. A substantive obligation to provide services ends when:

- The Company has the ability to reassess the risks associated with the policyholder and, as a result, can set a price or level of benefits that fully reflects the policyholder's risks; or
- The Company has the ability to reassess the risks of the portfolio containing the contract and, as a result, can set a price or level of benefits that fully reflect the risks of that portfolio. The pricing of premiums up to this reassessment date does not reflect the risks that relate to periods after the reassessment date.

Reinsurance contracts

For reinsurance contracts, the cash flows fall within the boundary of the contract if they arise from substantive rights and obligations that exist during the reporting period in which the Company is obliged to pay amounts to the reinsurer or has a substantive right to receive services from the reinsurer. The substantive right to receive services from the reinsurer ends when:



- The reinsurer has the ability to reassess the risks transferred to it and can set a price or level of benefits that fully reflects those reassessed risks; or
- The reinsurer has a substantive right to terminate the coverage.

Acquisition cash flows

Acquisition cash flows are costs that arise from the activities of selling, underwriting and starting a group of insurance contracts and that are directly attributable to the portfolio of insurance contracts to which the group belongs. These costs are allocated to groups of insurance contracts on a systematic and rational basis.

Acquisition cash flows that are directly attributable to a group of contracts are allocated to that group. Acquisition cash flows that are not directly attributable to a group of contracts but which can be directly allocated to a portfolio of contracts are allocated to groups of contracts in the portfolio or to groups of contracts that are expected to be in the portfolio. Once all contracts are added to a group of insurance contracts, the amounts allocated to that group are not revised any further.

The Company has not identified any acquisition costs that arise before the relevant group of insurance contracts is recognised on the balance sheet. Therefore, no asset is recognised for pre-recognition acquisition cash flows.

Acquisition cash flows for insurance contracts measured using the premium allocation approach are expensed when incurred (in accordance with the option provided under the premium allocation approach for insurance contracts with a coverage period not exceeding one year).

Risk adjustment for non-financial risks as perceived by the Company

Risk adjustments for non-financial risks are determined to reflect the compensation the Company would require for bearing non-financial risks and its degree of risk aversion. They are determined separately for the Life and Non-life contracts and are allocated to groups of contracts on the basis of an analysis of the risk profiles of the groups.

The risk adjustments for non-financial risks are determined on the basis of the following techniques.

- Liabilities for remaining coverage on the basis of a capital cost technique;
- Claims incurred from property insurance and reinsurance on the basis of a value at risk technique.

To determine the risk adjustments for non-financial risks in reinsurance contracts, the Company will apply these techniques both gross and net and derive the amount of the risk transferred to the reinsurer as the difference between the two results.

When applying a capital cost technique, the Company will determine the risk correction for non-financial risks by applying a capital cost rate to the amount of the capital required for each future annual report date. The calculations are made on an ultimate basis and the required capital will be determined on the basis of the Solvency II capital requirement for underwriting risks of the respective insurance contracts. The capital cost rate represents the extra compensation investors would require for exposure to the non-financial risk. The capital cost rate applied is 6%. The capital cost rate applied is the same as the one used to calculate the Solvency II risk margin (legally defined).

Measurement – approaches used

The Company measures groups of insurance contracts applying the following measurement approaches:

- The general measurement model (GMM), and
- The premium allocation approach (PAA).

The Company uses the general measurement model to measure the carrying amount of the liability or assets for the remaining coverage of groups of insurance and reinsurance contracts within the life business (incl. hospitalisation insurance).

The Company also applies the general measurement model for measuring the carrying amount of the liability for incurred claims.



The PAA is an optional measurement approach that may be used to measure the carrying amount of the liability or assets for the remaining coverage for insurance and reinsurance contracts that fulfil the admissibility criteria. The Company applies the PAA to all non-life insurance and reinsurance contracts (excluding hospitalisation insurance), as the coverage period of each contract in the group is one year or less.

Measurement – Life insurance contracts and hospitalisation insurance

Insurance contracts

On the date of initial recognition, the Company measures a group of contracts as the total of:

- The fulfilment cash flows, which are the probability-weighted average cash flows needed to fulfil the obligations under the insurance contract, and which consist of estimates of future cash flows, adjusted to reflect the time value of money and the associated financial risks, and a risk adjustment for non-financial risks; and
- The contractual service margin, which is the positive difference between the present value of the cash inflows and outflows, and which reflects the unearned profit included in an insurance contract that is gradually included in the statement of profit or loss.

The fulfilment cash flows of a group of contracts do not reflect the Company's non-performance risk.

If a group of insurance contracts is not profitable, then the group of insurance contracts is considered onerous and the contractual service margin is zero.

Cash flows within the boundary of a contract are those that relate directly to the fulfilment of the contract. These include payments to (or on behalf of) policyholders, insurance acquisition cash flows and other costs incurred in fulfilling contracts (such as claims handling costs, taxes and levies, and indirect internal costs of personnel, compliance, IT costs). Cash flows will be allocated to acquisition activities, other fulfilment activities and other activities at local entity level using cost allocation techniques. Cash flows attributable to acquisition and other fulfilment activities are allocated to groups of contracts using methods that are systematic and rational, and are applied consistently to all costs that have similar characteristics. The Company generally allocates insurance acquisition cash flows to groups of contracts based on the total premiums for each group, claims handling costs based on the number of claims for each group, and maintenance and administration costs based on the number of in-force contracts within each group.

The main characteristics of the estimates of the future cash flows are:

- They are current. When estimating future cash flows, the Company takes account of the current expectations of future events that might affect those cash flows;
- In estimating future cash flows the Company will use all reasonable and supportable information available (without excessive costs or efforts) on the reporting date. This information includes both internal and external historical data on claims and other experiences, updated to reflect current expectations of future events;
- They reflect a probability-weighted average of multiple scenarios that are reasonably expected to occur during the coverage period of the group of contracts; and
- They reflect the Company's perspective.

Estimates for future cash flows are subject to modelling by group of contracts. For the savings insurance contracts, an investment component is considered. This is equated to the accumulated reserve of the insurance contract in question.

The mortality/lifetime, morbidity and percentage of lapse assumptions used are developed based on a mix of national mortality tables, industry trends and recent experience within the Company.

Cash flows are discounted using the risk-free yield curve (euro-swap curve) adjusted to reflect the characteristics of the cash flows and the liquidity characteristics of the contracts (bottom-up approach), without applying convergence to an ultimate forward rate.

The Company has elected to split the insurance financing income or expense between amounts recognised in the statement of profit or loss and amounts recognised in other comprehensive income. Insurance financing income is recognised in the statement of profit or loss on a discount rate basis. The following discount rate is applied to future measurement dates:



- For products for which the future guaranteed rate is not fixed, the projected crediting rate method is used;
- For all other products, the fixed discount rate at the date of initial recognition is used.

The risk adjustment for non-financial risks for a group of contracts, which is determined separately from the other estimates, is the fee the Company would require for bearing uncertainty about the amount and the timing of the cash flows arising from non-financial risks. The risk adjustment for the liabilities for remaining coverage is calculated on the basis of the Cost of Capital method (without operational, counterparty or financial risk).

The contractual service margin (CSM) of a group of contracts represents the unearned profit that the Company will recognise as it provides services under these contracts. On initial recognition of a group of contracts, the group is not onerous if the total of (a) the fulfilment cash flows and (b) the current cash flows is a net inflow. In this case the CSM is valued as the equal and opposite amount of the net inflow, so no gains or losses arise on initial recognition. If the total is a net outflow, then the group is onerous and the net outflow is recognised as a loss in the statement of profit or loss, and a loss component is created to reflect the amount of the net outflow of cash, which is decisive for the amounts that are then presented in the statement of profit or loss as reversals of losses on onerous contracts and which are not recognised in the insurance income.

Subsequently, after initial recognition, the carrying amount of a group of contracts on each reporting date is the sum of the liability for remaining coverage and the liability for incurred claims.

The liability for remaining coverage includes (a) the fulfilment cash flows connected to services that will be provided under the contracts in future periods and (b) any remaining CSM on that date.

The fulfilment cash flows of groups of contracts are valued on the reporting date using current estimates of future cash flows, current discount rates and current estimates of the risk correction for non-financial risks. Changes in the fulfilment cash flows are recognised as follows:

- Changes regarding future services – adjust the contractual service margin or, for onerous contracts, as an adjustment of the loss component of the liability for remaining coverage; and
- Changes regarding current or past services are recognised in the insurance service result in the statement of profit or loss;
- Changes in fulfilment cash flows arising from the effect of the time value of money, and financial risk are included in the insurance finance result and then disaggregated to the statement of profit or loss and OCI.

The CSM is therefore only adjusted for changes in the fulfilment cash flows relating to future services and is recognised in the statement of profit or loss as the services are provided. The CSM on each reporting date represents the profit in the group of contracts that has not yet been recognised in the statement of profit or loss because it relates to future services. The CSM of a group of contracts is recognised in the statement of profit or loss to reflect the services provided in each year by:

- Determining the coverage units in the group;
- Allocating the CSM remaining at the end of the year (before any allocation) equally to each coverage unit that has been provided in the year and that is expected to be provided in the coming years, and
- Recognising the amount of the CSM allocated to the coverage units provided in the year in the statement of profit or loss.



The number of coverage units represents the quantity of insurance services provided by the contracts within the group, determined by taking into account the amount of benefits provided and the expected coverage period for each contract. The coverage unit used depends on the type of coverage offered by the specific product. Coverage units will be assessed and updated at each reporting date.

The liability for incurred claims includes the fulfilment cash flows for incurred claims and expenses that have not yet been paid, including claims that have been incurred but not yet reported (IBNR). For life insurance policies, outstanding liabilities are assumed at individual case level.

For hospitalisation insurance, future cash flows, in the context of liabilities for already incurred claims, are determined via so-called triangle extrapolations (chain ladder and variants) both for indemnities and anticipated claims costs. The main assumption underlying these techniques is that the Company uses past experience of claims development for the projection of claims development in future reporting periods, and consequently the final claims cost. Qualitative judgements are used in evaluating the extent to which past trends may not continue in the future.

Reinsurance contracts

The Company will apply the same accounting policies for the measurement of a group of reinsurance contracts, with the following changes.

The carrying amount of a group of reinsurance contracts on each reporting date is the sum of the asset for remaining coverage and the asset for incurred claims.

The asset for remaining coverage includes (a) the fulfilment cash flows relating to services that will be provided under the contracts in future periods and (b) any remaining contractual service margin on that date.

The Company measures estimates of the present value of the future cash flows based on assumptions that are consistent with those used to measure the estimates of the present value of the future cash flows for the underlying insurance contracts, with an adjustment for the non-performance risk of the reinsurer. The effect of the reinsurer's non-performance risk is assessed on each reporting date and the effect of changes are recognised in the insurance service result in the statement of profit or loss.

The risk adjustment for non-financial risks represents the amount of the risk transferred by the Company to the reinsurer. The risk adjustment is determined through a Cost of Capital calculation. For this the difference is considered of required capital (without operational, counterparty or financial risk), before and after reinsurance respectively.

The contractual service margin of a group of reinsurance contracts represents a net cost or net gain from concluding the reinsurance coverage. It is valued such that no gains or losses arise on initial recognition, except for:

- The immediate recognition in the statement of profit or loss of any net costs on concluding the reinsurance coverage if they relate to insured events that have occurred before the conclusion of the reinsurance coverage; and
- The immediate recognition of the gains associated with a reinsurance contract, when the Company recognises a loss on initial recognition of onerous underlying contracts if the reinsurance contract is concluded before or at the same time as the onerous underlying contracts. A loss recovery component is created, which is decisive for the amounts that are then presented in the statement of profit or loss as reversals of recoveries of losses on the reinsurance contracts.

The CSM is recognised in the statement of profit or loss when services are received. CSM is allocated to a reporting period on the basis of outstanding risk capital.



Measurement – Non-life insurance contracts

Insurance contracts

At the initial recognition of each group of non-life insurance contracts, the carrying amount of the liability for remaining coverage is measured based on the earned premiums. The Company elects to recognise insurance acquisition cash flows (acquisition commissions) immediately in profit or loss.

The Company expects that a group of insurance contracts measured using the premium allocation approach will not be onerous unless facts and circumstances indicate otherwise. Periodically, a verification will be carried out of whether a group may be onerous based on a combined ratio calculation.

If the above evaluation indicates that a group of insurance contracts could be onerous, the Company will recognise a loss in the statement of profit or loss and increase the liability for remaining coverage to the extent that current estimates of the fulfilment cash flows associated with the remaining coverage exceed the carrying amount of the liability.

Then, after initial recognition, the carrying amount of the liability for the remaining coverage is increased by any further premiums received and decreased by the amount recognised as insurance revenue for services provided. The Company expects that the time between the provision of each component of services and the relevant premium due date will not exceed one year. Accordingly, the Company does not adjust the liability for remaining coverage to reflect the time value of money and the effect of financial risk.

The Company will recognise the liability for incurred claims of a group of contracts at the amount of the fulfilment cash flows related to incurred claims. For the claims, estimates of future cash flows are determined via so-called triangle extrapolations (chain ladder and variants) for both the indemnities and anticipated claims costs. The future cash flows will be discounted (at the current discount curve).

For claims, a risk adjustment for non-financial risks will be determined via a value-at-risk approach.

Reinsurance contracts

The Company will apply the same accounting policies to a group of reinsurance contracts, adjusted as necessary to reflect characteristics different from those of the insurance contracts.

Presentation and disclosure

Portfolios of insurance contracts that are assets and those that are liabilities, and portfolios of reinsurance contracts that are assets and those that are liabilities are presented separately in the balance sheet. All rights and obligations arising from a portfolio of contracts are presented on a net basis.

In the statement of profit or loss and OCI, amounts are broken down into:

- An insurance service result, consisting of insurance revenues and insurance service expenses; and
- An insurance finance result.



Insurance service result

For contracts not measured in accordance with the PAA, insurance service revenue for each year represents the reduction of the remaining coverage obligation related to the provision of services arising from the group of insurance contracts for which the Company expects to receive compensation. Insurance service revenues include the following:

- Claims and other charges from insurance services incurred by the Company during the reporting period, which are generally measured at the amounts expected at the beginning of the reporting period;
- Changes in risk adjustment related to services in the current reporting period;
- The release of contractual service margin;
- Experience adjustments;
- The systematic allocation of the recovery of acquisition cash flows.

For contracts measured in accordance with the PAA, the insurance service result is recognised based on an allocation of the expected premium receipts to each coverage period based on the passage of time.

Expenses directly associated with the performance of contracts are recognised in the statement of profit or loss as insurance service costs, in general when they are incurred. Expenses not directly associated with the performance of contracts are presented outside the insurance service result.

Investment components are not included in insurance service result. The Company will determine the investment component of a contract by determining the amount that would be required to reimburse the policyholder under all scenarios. These include circumstances in which an insured event occurs, or the contract expires, or is terminated without an insured event occurring. The Company has determined that its savings insurance contracts contain an investment component, determined as the accumulated reserve.



Amounts received from reinsurers and reinsurance costs are presented on a net basis as “net cost from reinsurance contracts” in the insurance service result.

The Company chooses not to disaggregate the changes in risk adjustment for non-financial risks between the insurance service result and the insurance finance result. All changes in the risk adjustment for non-financial risks recognised in the statement of profit or loss will be included in the insurance service result.

Insurance finance result

Changes in the carrying amount of groups of contracts arising from the effects of the time value of money, the financial risk and changes in it are presented as insurance finance income and expenses.

The Company chooses to break down the insurance finance result between profit or loss and other parts of equity (OCI).

The amount recognised in the statement of profit or loss arising from the liability for remaining coverage will be determined by a systematic allocation of the expected total insurance finance income or expenses over the life of the group of contracts.

2. Equity attributable to the owners of the parent

The Company is the consolidating entity, with 87.43% of its shares owned by Investeringsmaatschappij Argenta (hereafter Investar) and 12.57% owned by Argenta Coöperatieve (hereafter Argen-Co). Equity including equity attributable to minority interests amounts to EUR 3,898,023,873 on 31 December 2024 compared to EUR 3,658,188,057 on 31 December 2023. The minority interests amount to EUR 356,252 on 31 December 2024. Further explanation can be found in Note 3.

Overview of IFRS equity	31/12/2023	31/12/2024
Paid up capital	729,814,600	742,203,200
Share premium	485,044,811	527,628,146
Accumulated fair value changes of debt securities measured at fair value through other comprehensive income	-65,964,496	-17,976,932
Accumulated fair value changes of equity instruments measured at fair value through other comprehensive income	15,942,077	-48,727
Accumulated (re)insurance reserve	267,250,682	202,911,216
Accumulated actuarial gains or losses on defined benefit pension plans	-6,204,872	-9,119,198
Reserves	1,946,236,664	2,125,179,610
Profit or loss attributable to owners of the parent (including interim dividends)	309,845,523	326,890,305
Interim dividends	-24,083,882	0
Minority interests	306,950	356,252
Total equity	3,658,188,057	3,898,023,873

The increase in equity in 2024 is the combined result of several factors. The individual elements of equity are further discussed in the text below.

Paid up capital and share premium

The paid up capital, represented by 7,422,032 shares, is EUR 742,203,200, and the issue premium is EUR 527,628,146 as of 31 December 2024.

Capital increases in the Company

The increase in paid up capital and share premium is the result of a capital increase of EUR 54,971,935, which took place on 29 May 2024. This capital increase involved the issue of 123,886 new shares and was subscribed by the present shareholders. In 2023, there was a capital increase at the Company of EUR 49,225,153.

Acquisition of own shares

Neither the Company, nor a direct subsidiary, nor any person acting in their own name but on behalf of the Company or the direct subsidiary, acquired shares of the Company during the 2024 financial year.



Accumulated other comprehensive income

Accumulated fair value changes of debt and equity instruments measured at fair value through other comprehensive income

The financial instruments measured at fair value through other comprehensive income are measured at fair value, with all fluctuations in the fair value recognised in a separate line in equity until realisation of the assets or until an impairment loss occurs, with the exception of equity instruments in respect of which no impairment losses are recognised and realised results are transferred directly to the reserves.

The above-mentioned fluctuations in fair value are found in shareholders' equity under "Accumulated other comprehensive income". This component (which arises after offsetting of deferred taxes and the changes in fair value of hedged items with micro fair value hedging) evolved from EUR -50,022,610 on 31 December 2023 to EUR -18,025,865 on 31 December 2024.

	31/12/2023	to profit or loss	to reserves	to other comprehensive income	taxes	31/12/2024
Debt securities at fair value through other comprehensive income						
Accumulated valuation gains or losses	-87,952,896	-4,785,254		68,768,675		-23,969,476
Deferred taxes	21,988,225				-15,995,855	5,992,370
Equity instruments at fair value through other comprehensive income						
Accumulated valuation gains or losses	19,360,072		-63,885	-17,674,125		1,622,063
Deferred taxes	-3,418,011				1,747,189	-1,670,822
Accumulated other comprehensive income for debt securities and equity instruments	-50,022,610	-4,785,254	-63,885	51,094,550	-14,248,666	-18,025,865

In the 2024 financial year a total of EUR 4,785,254 was recycled to profit or loss. Note 13 gives further information on the treatment of micro hedges.

Accumulated (re)insurance reserve

The insurance and reinsurance contracts are valued using the risk-free yield curve (euro-swap curve) that has been adjusted to reflect the characteristics of the cash flows and the liquidity characteristics of the contracts. The Company has elected to split the insurance financing income or expense between amounts recognised in the statement of profit or loss and amounts recognised in other comprehensive income.



	31/12/2023	to profit or loss	to other comprehensive income	taxes	31/12/2024
Valuation of insurance contracts					
Accumulated valuation gains or losses taken to equity	355,298,817	0	-84,004,931	0	271,293,886
Deferred taxes	-88,824,705			21,001,233	-67,823,472
Accumulated other comprehensive income for insurance contracts	266,474,113	0	-84,004,931	21,001,233	203,470,414
Valuation of reinsurance contracts					
Accumulated valuation gains or losses taken to equity	1,035,647	0	-1,781,076	0	-745,430
Deferred taxes	-258,912			445,269	186,357
Accumulated other comprehensive income for reinsurance contracts	776,735	0	-1,781,076	445,269	-559,072
Total	267,250,847	0	-85,786,007	21,446,502	202,911,342

This component (which arises after offsetting deferred taxes) developed from EUR 267,250,847 as of 31 December 2023 to EUR 202,911,342 as of 31 December 2024.

Accumulated actuarial gains or losses on defined benefit pension plans



Revaluations of the net benefit obligations for defined benefit pension obligations are recognised under a separate line in equity and are never transferred to the statement of profit or loss. Revaluations are the result of changes in actuarial assumptions, experience adjustments, return on scheme assets and changes in the asset ceiling. Note 25 gives further information on the treatment of pension obligations.

Reserves

The reserves (EUR 2,125,179,610 on 31 December 2024) contains the statutory reserves (legal reserves, available reserves and retained earnings) and the consolidated reserves of the Company. The legal reserve is the reserve fund as referred to in Articles 7:211 of the Belgian Companies and Associations Code, which requires the formation of a legal reserve amounting to at least one tenth of the share capital. The available reserves are the reserves that are eligible for distribution. The retained earnings are the sum of profits or losses that have not been added to the available reserves during the appropriation of the result and which it has nevertheless been decided to keep in the Company.

Profit or loss attributable to owners of the parent

The consolidated result (excluding minority interests) for the year ending on 31 December 2024 was EUR 326,890,305 compared to EUR 309,845,523 for the previous financial year.

Dividends

In the second quarter of 2024, a final dividend of EUR 82,760,976 (EUR 11.34 per share) was paid to shareholders. Subsequently a capital increase of EUR 54,971,935 in the Company took place, subscribed by the two shareholders. In the fourth quarter of 2024, an interim dividend of EUR 24,121,604 (EUR 3.25 per share) was paid.

A proposal for a declaration of dividend will be made by the Company's Board of Directors to the Company's General Meeting of shareholders. This is a dividend of EUR 84,536,944 (EUR 11.39 per share) for financial year 2024 through profit appropriation.

3. Minority interests

In 2023, EUR 306,950 was attributable to the minority interests, and EUR 356,252 in 2024. The limited increase in the minority interest in the Company's accounts relates to the result attributable to minority interests from the company Arvestar, 25.01% of the shares in which were held by Degroof Petercam at the end of 2024.

4. Risk management

Information regarding risk policy and governance is included in sections 4.1 and 5.2 of the integrated annual report.

The Company's risk profile is mapped out at every quarter/year-end. A number of RAF indicators also apply at Group level, and the NFR RAF indicators are consolidated.

The risk profile is determined by assigning a colour to each risk indicator and by calculating an average risk score.

A limitative number of RAF limits are linked to these risk parameters:

- The eight financial risk types are subdivided into the following categories/risks: market risk, credit risk, liquidity risk, business risk, capital risk, model risk, climate (& sustainability) risk and underwriting risk (only for the insurer).
- The 12 non-financial risk types are subdivided into the following categories/risks: sourcing risk, human resources risk, information-security & cyber risk, legal & regulatory risk, fraud risk, data management risk, strategic & change risk, resilience (formerly business continuity) risk, brand & sustainability risk, IT risk, process risk and compliance risk. Sub-risk types are defined for compliance risk.



In addition, a voluntaristic Risk Appetite Framework (RAF) is developed as preparation for the new business plan, alongside a budgeted RAF for evaluating the current business plan. This way the RAF is reported from 3 perspectives and is strongly embedded in the business plan.

4.1. Financial risks

The financial risk policy was renewed in 2024, with the related standards.

Each year, the FR risks that are considered priorities ("hot spot risks") are identified, and these will subsequently be the focus for the upcoming year. In 2024, the priorities for the financial risks were market risk, business risk, and climate & sustainability risk (ESG).

4.1.1. Market risk

Market risk is the risk of a negative change in the financial position as a result of the volatility of market prices of financial instruments. Within market risk, the following four risks are relevant: interest rate risk, spread-widening risk, equity risk and real estate risk. The Company does not hold foreign currency at its own risk. Assets and liabilities are exclusively denominated in euros. The Company does not have a trading book.

This is all contained in Argenta Spaarbank's "Market Risk" standard, included and validated as an addendum to the Argenta Group financial risk policy.

The risk appetite is managed in the Bank Pool's RAF by RAF limits and flashing light levels on the following risk indicators:

- IRR BB value at risk 99.9% – value stability interest rate risk
- IRR BB SOT EVE (interest rate risk banking book supervisory outlier test economic value of equity) – value stability interest rate risk
- IRR BB SOT delta NII (interest rate risk banking book supervisory outlier test net interest income) – income stability interest rate risk
- CSR BB (credit spread risk banking book) value at risk 99.9% – value stability credit spread risk
- CSR BB (credit spread risk banking book) other comprehensive income sub-limit; value at risk 99.9% – value stability spread risk
- CSR BB delta NII (credit spread risk banking book net interest income) – income stability credit spread risk

Interest rate risk

Exposure

The main market risk to which the Company is exposed is the interest rate risk in the banking book (IRRBB). The Company has no trading book. IRRBB arises from changes in market interest rates and their possible negative impact on the interest result and the market value of the interest-bearing assets and liabilities.

The Company's profit and equity position are sensitive to such interest rate changes because the business model fundamentally consists of raising funds in the short to medium term and investing them in retail loans. This mainly concerns retail funding through current, savings and term account deposits, which are supplemented secondly by wholesale funding for diversification. These funds are then mainly reinvested in long-term retail loans, supplemented by a liquid investment portfolio. The mismatch between the various interest terms generates an interest result that is subject to interest rate risk and that is managed according to an internal risk acceptance framework and in line with statutory regulations.

Risk management

The Alco is responsible for managing interest rate and liquidity risk. It monitors and optimises the financial risks and reports to the Executive Committee. The Alco manages both the interest sensitivity of the net interest income and the interest sensitivity of equity in accordance with defined RAF limits.

In its interest rate risk management, consideration is given to the different sub-types of interest rate risk to which the bank is potentially exposed. They include gap risk (risk from interest rate mismatch between assets and liabilities), the option risk (risk from the embedded options within the assets and liabilities) and the basis risk (risk from a difference in the reference indexes used for repricing assets and liabilities).

Business risk (including the risk that the price elasticity of products without contractual interest maturity dates will evolve differently from what is anticipated and modelled) is managed separately.

In order to keep the risks within the risk appetite framework (RAF) determined by the Board of Directors and within legal limits, the balance sheet is managed both endogenously and exogenously. To this end, under an Alco mandate, a monthly Hedging Committee meeting takes exogenous hedging action by means of plain vanilla interest rate derivatives (mainly payer and receiver swaps and swaptions) and reports on this to the Alco. Endogenous management refers to managing the balance sheet mix between assets and liabilities products gradually.

More information on the fair value hedges can be found in Notes 13 and 25.

Sensitivity analysis – interest rate risk in the Bank Pool

The following table shows the interest rate sensitivity of the result over a period of 12 months and of the equity of Aspa in the event of a parallel interest rate shock of +/- 100 bp.

In the absence of a trading book, the interest rate risk in the banking book therefore represents the entire interest rate risk.

	31/12/2023		31/12/2024	
	+100bp	-100bp	+100bp	-100bp
Impact on earnings (over 12 months)	32,095,454	-32,550,823	26,314,973	-26,921,280
Impact on equity	-57,564,616	-49,362,878	-134,785,453	21,415,923

Such sensitivity is monitored using the following internal method, which is largely in line with the prevailing EBA's IRRBB guidelines that came into effect on 30 June 2023:



- The repricing behaviour for savings accounts without contractual maturity dates is modelled on the basis of business-economic replicating models. There are specific models for the Belgian retail savings, Belgian savings by professionals, Dutch retail savings and Belgian retail current accounts portfolios;
- Loan repayment behaviour is accounted for based on interest rate dynamic Conditional Prepayment Rate (CPR) models, which reflect the actual prepayment behaviour in the Belgian and Dutch mortgage portfolios;
- Results sensitivity is calculated on the assumption of a flat balance sheet (the balance sheet total and the balance mix are kept constant);
- In the calculation of the income impact over 12 months, the rate of replacement production is determined using the 12-month average gross margins on recent production;
- To determine the interest result impact over 12 months, the interest rate shock is assumed to take place in four steps of 25 bp (25 bp immediately, 25 bp after three months, 25 bp after six months, and 25 bp after nine months);
- In the 12-month result impact, the goal is to capture the structural result, which excludes income from prepayment penalties;
- Possible income impact as a consequence of business risk and basis risk is analysed separately and is no longer included in the above income impact over 12 months;
- For determining the impact on equity, the full interest rate shock is calculated immediately;
- Expected drawdowns of the pipeline credit facilities and not yet fully drawn-down credit facilities at position date are included in equity simulations;
- Interest rate caps and floors on variable interest rate loans are taken into account;
- Call options in the securities portfolio are taken into account;
- The prevailing EBA floor, if in force, serves as the interest rate floor in -100bp sensitivity analyses;
- A negative market value impact by the interest rate floor on regulated savings is taken into account in capital simulations.



The negative impact of a +100 bp rise in interest rates on equity increased in 2024 driven by mortgage production, which increased the outstanding mortgage loan portfolio. This effect was amplified by a recalibration of the CPR model for Belgian mortgages that lowered expected prepayments, and by entering into receiver swaps and receiver swaptions to mitigate the impact of interest rate falls. The negative impact was endogenously mitigated by the issuance of two new covered bonds. The decrease in the average maturity of the outstanding investment portfolio, which reduces sensitivity to a rise in interest rates, also contributed to this. A change in the CPR model for Dutch mortgages, regarding the projection of the house price index, also had a slight offsetting effect.

Unlike the previous year, an interest rate fall of 100 bp had a positive impact on equity in 2024, leading to a higher negative impact if interest rates rise. This is largely the result of the aforementioned receiver swaps that were entered into. This effect was further amplified by newly concluded receiver swaptions. These were added in 2024 as an additional hedging instrument to mitigate the optionality risk in the mortgage portfolio in the event of a drop in interest rates. However, there is also a significant positive contribution from that mortgage portfolio. This is partly due to the implementation of a dynamic margin model for mortgages, which slightly lowers the financial prepayment incentive and reduces expected prepayments. The positive impact on equity is tempered by, among other things, the aforementioned issuance of two new covered bonds and the decreased average maturity of the outstanding investment portfolio, which, in contrast to a rise in interest rates, have the opposite effect here.

The changes in the impact on the result, due to the parallel 100 bp interest rate shocks compared to 2023, show a convergence of sensitivities. There is a less positive and a less negative impact under +100 bp and -100 bp scenario. This is partly the result of the shortening of the remaining term of the material volume of term deposits that were taken out in the third quarter of 2023 with a 1-year term. As a result, at the end of 2024 a relatively larger share of funding repriced to the shocked yield curve and there will therefore be a faster rise or fall in the weighted average funding cost below +100 bp and -100 bp. The impact of rolling over term deposits maturing in 2024 was also more constrained as a result of hedging.

The hedging strategy remains focused on actively controlling interest rate risk. This involves assessing sensitivities not only under parallel upward and downward shocks but also under the six defined EBA interest rate shocks. Both the equity impact and the result impact are consistently considered.

The exogenous hedging instruments used are accounted for under hedge accounting. The qualification criteria are monitored on a monthly basis and were consistently met in 2024.

Sensitivity analysis – interest rate risk in the Insurance Pool

The following equity and income sensitivity analysis shows the impact on the result over a period of 12 months and on equity at Aras of parallel interest rate shocks.

	31/12/2023		31/12/2024	
	+100bp	-100bp	+100bp	-100bp
Impact on earnings (over 12 months)	1,880,650	-3,559,461	2,941,423	-3,943,239
Impact on equity	1,877,096	-15,549,045	26,188,837	-40,953,111

The calculation of income sensitivity is based on:

- Balance sheet position with production as foreseen in the business plan;
- Flat rates;
- The interest result on the Life portfolio.

The calculation of equity sensitivity is based on:

- The methodology applied under Solvency II, Pillar 1;
- Interest rate sensitivity over the entire balance sheet.

A 100 bp increase or decrease in interest rates over the first year has a limited impact on Life insurance interest income. This is similar to the previous year's position and it is expected to remain limited until the end of 2025 owing to good cash flow matching.

At the end of 2024 an increase in interest rates would, according to the Solvency up scenario, have a positive impact of EUR 26.2 million on the market value of equity. A fall in interest rates under the Solvency down scenario has a negative impact on equity of EUR 40.9 million.

The impact of the down scenario in the area of income sensitivity on equity is in line with that of the previous year but remains limited because of good cash flow matching. The impact of the down scenario on the market value sensitivity of equity is much higher (a deterioration of EUR 25.5 million), mainly due to higher volatility of future distributions of profit (future options and guarantees or FOG: EUR 14.6 million) and to a lesser extent due to higher market value sensitivity within pure branch 21 (EUR +5.6 million).

Spread widening risk

Exposure

The return on the investment portfolio is largely determined by the credit spread earned on the investments made. The evolution and fluctuations of the credit spread are often market driven and influenced by factors other than those that may directly or indirectly influence the issuer's creditworthiness.

These market risk factors give rise to spread widening risk. Alongside the interest rate risk, they are the main driver of asset returns and the economic value of the investment portfolio.



Risk management

Maintaining a prudent investment policy, frequent monitoring of the fluctuations in the economic value of the investment portfolio, and measuring the sensitivity of changes in credit spreads from both income and market value perspectives within the risk appetite and limits set by the Board of Directors (RAF) are important pillars of sound portfolio management.

The investment policy is governed by a strict investment framework, as defined in the Company's financial policies and standards, which determines the permitted investment envelope and maximum duration depending on the creditworthiness of the issuer. This investment policy is shaped by a thorough analysis of the credit sectors and investment files and an active screening of market opportunities.

The evolution of the market value of the investment portfolio is monitored in the Alco and in the Investment Consultation (IO). Credit spread sensitivity is calculated and monitored within the RAF framework with both the sensitivity of the result and the equity and within the ICAAP framework, where it is calculated together with credit risk.

Sensitivity analysis – spread widening risk

The Company calculates the spread risk on the totality of the investment portfolio. The spread sensitivity is calculated according to a modified spread duration (with convexity adjustment).

The sensitivity on the NII is calculated as an impact over a 12-month horizon and is also calculated on the assumption of a flat balance sheet (the balance sheet total and the balance mix are kept constant). This assumption is identical to the one used to calculate interest rate risk.

For spread sensitivity to the market value of Aspa and Aras, CSRBB RAF limits were defined that reflect the impact of a shift to an extreme spread widening scenario (99.9% percentile and 99.5% percentile, respectively) as a percentage of equity (T1 equity or SII available capital). The table below shows the latest figures:

	31/12/2023		31/12/2024	
	Aspa	Aras	Aspa	Aras
Impact on the market value in % of equity	-22.58%	-15.42%	-14.10%	-13.31%
Impact on NII	-3,341,807	-1,003,891	-4,465,110	-1,479,079

These calculations have the following attributes:

- They form an output of the ICAAP and ORSA processes;
- The shock is based on historical series of spread indices;
- They take into account diversification between positions and correlation of spread data;
- They do not include derivatives or branch 23 positions.

The spread widening risk decreased in 2024 due to a structural reduction in the average duration profile of the portfolios and an increase in the current spreads, reducing the calculation of additional risk. Note that for Aras, the calculation began on June 30, 2024, and the recorded sensitivities as of December 31, 2023, were calculated ex-post.



Equity risk

Exposure

From a strategic allocation perspective, equities can complement the existing bond and loan portfolios and are intended to optimise the risk return profile of the portfolio. Within the investment framework and subject to compliance with strict investment criteria, the Company has the possibility to take equity positions into its investment portfolio. Aspa holds limited equity positions in counterparties active in real estate operations, while Aras's equity portfolio includes corporates and real estate counterparties.

Risk management

The portfolio of individual shares is limited and is managed within a rigorous risk management framework, including limits on size, permitted sectors (real estate), market capitalisation and concentration.

Equity price risk is controlled through comprehensive analysis of the underlying fundamentals and by aligning the investment policy with the risk appetite and limits (RAF) established by the board of directors.

Sensitivity analysis – equity risk

The sensitivity analysis below shows the impact on the Company of a 10% fall in the market value of equity instruments.

	31/12/2023	31/12/2024
	-10%	-10%
Impact on earnings	-6,134,426	-6,019,072
Impact on equity	-14,696,773	-13,461,535

Equity instruments at fair value through other comprehensive income amount to EUR 134,615,353 (market value) on 31 December 2024. If the markets fall by 10%, the amount in equity will decrease by EUR 13,461,535 and no impairments will be recorded in IFRS. Equity instruments at fair value through profit or loss amount to EUR 60,190,717 on 31 December 2024. A 10% decrease will be immediately recognised in the statement of profit or loss.

The Insurance Pool sells and distributes branch 23 insurance contracts. These insurance contracts invest, on behalf of the customer, in various funds that invest primarily in shares and bonds. The equity risk related to these insurance contracts is borne by the policyholder.

Property risk

Exposure

The evolution of real estate prices influences retail lending and the credit risk through the pledging of property as collateral. One of the Company's core activities is mortgage lending to private individuals in Belgium and the Netherlands. This makes the Company dependent on, among other things, developments in the housing market.

At the same time, the investment framework allows a portfolio of indirect investment properties. These are not direct investments in real estate but include lending to or debt and equity instruments to counterparties active in the real estate sector. The above risks are addressed under Note 4.1.3 Credit risk.

In the context of the foreclosure policy, in exceptional circumstances properties are temporarily purchased by the Company with the aim of future realisation. A very limited direct real estate investment is also held by Argenta Assuranties. These constitute direct real estate investments.



Risk management

The indirect real estate investments are managed within a rigorous risk management framework, including limits on investment type, geography and concentration (see heading “Credit risk” below).

Direct real estate investments are accounted for using the cost price model. The unrealised capital losses and gains on these direct real estate investments are not recorded in equity.

Sensitivity analysis – property risk

For mortgage lending, an adjustment of the value of the underlying property will have a consequence for the level of the expected credit losses recognised. The sensitivity is included in Note 36 Impairments.

The expected sensitivity is limited for the direct investment properties. At the end of the 2024 financial year, the direct investment properties portfolio had a carrying amount of EUR 842,063. At the end of 2023, the carrying amount was EUR 850,767. A 10% decrease in market value will – as long as there is no permanent impairment – have no impact on the result. The maximum risk of loss is EUR 842,063.

4.1.2. Liquidity risk

Exposure

Liquidity risk is the risk of an adverse change in the financial situation, as a direct or indirect consequence of insufficient liquidity being available to meet financial obligations.

The Company's strategy involves raising funds primarily on a short- or medium-term basis and reinvesting these funds through various forms of loans and investments, predominantly over the long term.

Liquidity sources of the Bank Pool

Aspa's financing model and liquidity profile are mainly characterised by:

- A substantial base of customer deposits;
- A large presence across the Belgian and Dutch markets;
- A diversification towards wholesale funding consisting of RMBS, covered bonds, senior bonds including green bonds and certificates of deposits;
- A liquid securities portfolio.

The funding policy is directed first and foremost at obtaining funds from retail customers in Belgium and the Netherlands through payments and savings accounts and term deposits. Customer deposits represent the largest and most important primary funding sources of Aspa's banking activities.

Aspa is also active in the interbank or professional market to fund itself in order to diversify its financing sources and to meet new legal requirements, or support the S&P rating (EMTN programme with the possibility to issue Tier-2, Senior Non Preferred (SNP) or Senior Preferred (SP) instruments). Since 2021, Argenta can, after obtaining a licence from the regulator, issue Belgian Covered Bonds (CB). Periodically, repos can also be concluded in the context of liquidity management. The retained covered bond and the launch of a certificate of deposit programme – both in 2024 – contribute to the rapidly implementable liquidity options.

The deposits by retail customers can be considered as both sources of liquidity and sources of liquidity risk. Current accounts and savings from individuals can be withdrawn on demand or at short notice, but nevertheless provide an important contribution to the stability of the long-term funding base. This stability is inherently dependent on maintaining account holders' confidence in the Company's solvency, profitability, and risk management.



The table below presents the funding sources at Aspa conso level, the intragroup positions in relation to the other group entities not being eliminated since they are not significant.

Funding sources	31/12/2023	31/12/2024
Deposits from central banks	0.00%	0.00%
Deposits from credit institutions	2.21%	1.63%
Deposits from other counterparties than central banks and credit institutions	83.38%	82.96%
Debt securities issued	13.21%	14.17%
Other liabilities	1.20%	1.24%
Total liabilities	100.00%	100.00%
Total liabilities in euros	51,111,441,542	52,848,579,997

Risk management in the Bank Pool

Aspa has a continuous internal risk-based assessment of both current and future funding and liquidity requirements to ensure that sufficient liquidity and funding resources are available to cover the risks arising from the business strategy. This is described in the Liquidity & Funding Risk framework standard. This standard, which has been included and validated as an addendum to the Argenta Group financial risks policy, provides an overview and description of the key elements of the ILAAP (Internal Liquidity Adequacy Assessment Process) and their interaction, and explains how ILAAP is integrated into Aspa's operations and how its findings are used.



The Alco monitors the liquidity indicators on a systematic basis. The first line responsibility for measuring, monitoring, checking and reporting of the liquidity risk lies with the ALM department. The liquidity risk is monitored both from a market liquidity risk perspective (liquidation value of assets) and from a refinancing risk perspective (funding stability). The second-line responsibility lies with the Risk department. Management of the liquidity position falls under the authority of the Treasury and Investment Management department.

For measuring, monitoring, checking and reporting on the liquidity risk, Aspa has a specially adapted management information system, including a contingency plan, in order to adequately manage its liquidity in normal and exceptional circumstances. In addition to the extensive regulatory reporting, extensive internal reporting has also been developed. This way, management and stakeholders are permanently aware of the evolving situation. Daily financing reports are distributed to a broad target group within the Company.

The daily liquidity management, the definition of additional Early Warning Indicators (EWIs), operational limits or flashing lights, and the organisation of stress tests are included in the Liquidity & Funding Risk framework standard.

In the Company's RAF, the risk appetite is managed by RAF limits on the following risk indicators:

- The LCR (Liquidity Coverage Ratio) this ratio compares the liquidity buffer against a pre-defined outflow of financial liabilities over a 30 day period;
- The NSFR (Net Stable Funding Ratio) compares available liquidity against required liquidity over a period of at least one year;
- The AER (Asset Encumbrance Ratio), strict and broad: this ratio compares the amount of unencumbered assets against the volume of protected deposits;
- Loans/balance ratio: this ratio monitors the illiquid portion of the assets within set limits; and
- Wholesale funding ratios: these ratios monitors the proportion of institutional funding and refinancing risk relative to total assets within set limits.

In addition to the aforementioned RAF indicators, further EWIs, operational limits and flashing lights have been defined internally.

The overview of the ratios (unaudited) and legal limits, on an unconsolidated basis, can be found in the following table:

	Legal Limits	31/12/2023	31/12/2024
LCR	100%	216%	212%
NSFR	100%	145%	148%
Strict AER	95%	112.2%	110.0%
Broad AER	110%	117.3%	115.1%

The flashing light threshold and the recovery plan threshold for the AER depend on the category in which the Company is situated. This category is determined as a function of the eligible deposits as defined in Article 389 of the Banking Act in relation to the total assets of the institution. In 2024, Aspa was classified in category 2.

The immediately available liquidity sources consist of high-quality assets. These consist mainly of a diversified portfolio of central bank reserves, government bonds, securitisations and corporate bonds. In addition to the liquid assets eligible for the LCR, Aspa also has a portfolio of ECB-eligible and other saleable securities.

All liabilities and assets are denominated in euro, so that there is no currency mismatch between the liquidity and financing sources.

Aspa maintains a derivatives portfolio to hedge the interest rate risk. The value of this portfolio is secured with collateral. Assets used as collateral are excluded from the LCR (Liquidity Coverage Ratio) liquidity buffer. The LCR also takes into account potential collateral outflows due to fluctuations in the valuation of the portfolio and a negative evolution of Aspa's rating. The evolution of the collateral is closely monitored.

Risk management in the Insurance Pool

The future liquidity position is monitored by comparing the cash flow profile of the assets and liabilities against each other on a quarterly basis. If necessary, balance sheet management actions are undertaken to address any identified gaps.

The existing gap between the portfolio and the corresponding insurance contracts is monitored systematically. This monitoring is part of the periodic maturity gap analysis. The management measures include balance sheet management through proactive initiatives to retain insurance contracts with Aras at their maturity, repos and establishing credit lines with financial institutions.

The most important RAF risk indicator in the management of liquidity risk in the Insurance Pool is the ratio of cumulative maturity gap to free repo capacity, along with the ratio of ECB-eligible assets to covering assets Life, which serves to monitor the desired level of repo capacity.

	31/12/2023	31/12/2024
Cumulative maturity liquidity gap/free repo capacity	-17.10%	-1.60%
ECB-eligible assets/covering assets Life	32.70%	35.80%

The cumulative maturity gap/free repo capacity tracks the liquidity gap risk:

- It tracks repo capacity as an additional buffer to absorb the highest cumulative maturity gap due to maturity mismatch between assets and liabilities. The limit applies globally to the Life segment (branch 21).

The decrease in the cumulative maturity gap/free repo capacity is due to a decrease in the cumulative excess liquidity, while the free repo capacity remained roughly the same.

The ECB-eligible assets/covering assets, based on the following calculation assumptions:

- ECB-eligible assets can serve as collateral for ECB funding and the ratio is calculated on the Life segment (branch 21), where the numerator consists of the total ECB-eligible assets and the denominator consists of the covering assets.



Maturity analysis Bank Pool

Notes 10, 11 and 12 contain additional information on the remaining terms of the financial assets at fair value through other comprehensive income and on the financial assets at amortised cost. The table below shows a maturity analysis for the financial liabilities held for trading, the financial liabilities measured at amortised cost, derivatives used for hedging purposes and other liabilities.

The tables below present the maturity analysis at Aspa conso level, the intragroup positions in relation to the other group entities not being eliminated since they are not significant.

31/12/2023	< 3 months	< 12 months	1-5 years	> 5 years
Financial liabilities held for trading	9,868,909	21,918,121	52,815,023	22,703,905
Financial liabilities at amortised cost				
Deposits from central banks	0	0	0	0
Deposits from credit institutions	1,130,294,811	0	0	0
Deposits from others – without a fixed term	34,197,992,091	0	0	0
Deposits from others – with a fixed term	383,554,609	6,212,739,949	1,820,093,014	834,173
Debt securities issued – bonds	910,971,811	146,797,341	4,177,688,635	1,517,066,160
Other financial liabilities	3,280,277	9,840,830	44,070,232	28,486,008
Derivatives used for hedging	79,852,446	283,198,116	785,193,074	1,324,288,184
Total financial liabilities	36,715,814,953	6,674,494,356	6,879,859,977	2,893,378,429
31/12/2024	< 3 months	< 12 months	1-5 years	> 5 years
Financial liabilities held for trading	5,881,940	8,283,624	24,820,909	8,841,170
Financial liabilities at amortised cost				
Deposits from central banks	0	0	0	0
Deposits from credit institutions	858,542,805	0	4,224,105	0
Deposits from others – without a fixed term	36,949,324,101	0	0	0
Deposits from others – with a fixed term	544,908,599	1,634,882,921	4,713,268,662	10,107
Debt securities issued – bonds	523,401,502	608,633,970	4,568,913,101	1,786,260,387
Other financial liabilities	3,653,335	10,960,006	48,206,167	29,084,158
Derivatives used for hedging	92,536,007	275,325,755	1,092,777,324	1,464,733,957
Total financial liabilities	38,978,248,290	2,538,086,277	10,452,210,267	3,288,929,779

Financial liabilities held for trading consist of the derivatives (caps) entered into as part of economic interest rate risk hedges, but for which no formal hedge accounting could be applied.

Interest flows from the interest rate swaps categorised under derivatives used for hedging and financial liabilities held for trading purposes are included in the respective category. This interest is calculated using the fixed and variable rates as of 31 December 2024 for the respective fixed and variable parts of the interest rate swaps.



In the table above, demand deposits, special deposits and regulated savings deposits have been classified in the < 3 months bracket. For deposits from others – with a fixed term, there is a decrease and a shift in term due to the expiry of 1-year term accounts, which have largely been replaced by term accounts with a longer term. However, a portion of the funds from these term accounts has been reallocated to deposits without fixed term (savings accounts).

The 'debt securities issued – bonds' follow the contractual maturity dates, with, for example, an SP EMTN of EUR 500 million maturing on 6 February 2024 and the GA 2017 bond arriving at its call date on 17 March 2024. At the same time, new covered bonds were issued (see www.argenta.eu).

The other financial liabilities relate to debts of lease contracts.

Maturity analysis Insurance Pool

The Insurance Pool does not make use of derivatives. The maturity analysis of the liabilities is shown by category in the table below.

31/12/2023	< 12 months	1-5 years	> 5 years
Financial liabilities related to unit-linked insurance contracts (branch 23)	180,502,391	788,175,112	2,027,112,970
Financial liabilities at amortised cost			
Deposits from credit institutions	0	0	0
Deposits from others – without a fixed term	19,795	0	0
Deposits from others – with a fixed term	0	0	12,515,442
Other financial liabilities	26,797	14,568	50,998
Total	180,548,983	788,189,680	2,039,679,410
31/12/2024	< 12 months	1-5 years	> 5 years
Financial liabilities related to unit-linked insurance contracts (branch 23)	219,186,135	809,722,956	2,189,230,821
Financial liabilities at amortised cost			
Deposits from credit institutions	0	0	0
Deposits from others – without a fixed term	0	0	0
Deposits from others – with a fixed term	0	0	12,189,060
Other financial liabilities	39,636	73,897	7,801
Total	219,225,771	809,796,852	2,201,427,682

Financial liabilities related to unit-linked insurance contracts (branch 23) relate to investment contracts. The outstanding reserves are categorised according to the remaining contractual term.



The maturity analysis of the insurance liabilities is shown in the table below.

31/12/2023	Up to 1 year	Up to 2 years	Up to 3 years	Up to 4 years	Up to 5 years	> 5 years
Liabilities under insurance and reinsurance contracts						
Insurance	-878,697	58,122,061	58,794,489	91,851,655	122,484,397	1,883,953,842
Reinsurance	0	0	0	0	0	0
Total	-878,697	58,122,061	58,794,489	91,851,655	122,484,397	1,883,953,842

31/12/2024	Up to 1 year	Up to 2 years	Up to 3 years	Up to 4 years	Up to 5 years	> 5 years
Liabilities under insurance and reinsurance contracts						
Insurance	-8,001,738	56,750,009	89,427,798	119,048,135	98,131,773	2,030,985,558
Reinsurance	0	0	0	0	0	0
Total	-8,001,738	56,750,009	89,427,798	119,048,135	98,131,773	2,030,985,558

This is recognised based on the discounted value of future cash flows related to remaining coverage.

The immediately withdrawable amounts for insurance contracts for branch 21 represents the surrender value (based on accrued reserves minus the surrender penalty) and amount to EUR 2,600,539,374 on 31 December 2024 (compared to EUR 2,546,209,166 on 31 December 2023).

4.1.3. Credit risk

Exposure

Credit risk is the risk of an adverse change in the financial situation, as a direct or indirect result of a decline in the creditworthiness of counterparties, debtors and issuers (or guarantors) of securities.

For the Company, there are essentially three segments for credit risk: (i) the retail market and in particular the retail mortgage lending market (in both Belgium and the Netherlands), (ii) the investment portfolio along with the portfolio of loans to local and regional authorities and (selectively) to corporates, and (iii) reinsurers. Credit risk management is therefore focused on these three segments.

Risk management

In the retail segment, the Company's target group consists of natural persons having their main place of residence in Belgium (for the Belgian loan portfolio) or the Netherlands (for the Dutch loan portfolio) and wanting to take out loans for primarily for non-professional purposes. In Belgium, up to 49% of the property's surface area may be used for professional purposes, while in the Netherlands, a maximum of 25% of the property's market value may be used for professional purposes. The loan must always be taken out by a natural person.

Argenta provides investment loans primarily for professional purposes exclusively to its own branch holders.

In addition to the mortgage loans, instalment loans (consumer loans) are also offered in Belgium.

Since May 2024, Argenta also offers instalment loans for professional purposes. These are offered to natural persons with a company registration number and to micro-enterprises. Micro-enterprises are defined as enterprises that meet two of three following conditions: a maximum balance sheet total of EUR 2,000,000, a maximum turnover of EUR 2,000,000, and a workforce of no more than 10 full-time equivalents (FTE).



The most important elements of risk management for the retail segment are the limits and escalation framework from the financial risks policy and the associated Credit Management Retail Belgium and Credit Management Retail Netherlands standards, with the Belgian acceptance and authorisation framework and the Dutch mortgage acceptance policy for the granting of the loans and advances with, for example, the limits set for assessing the creditworthiness of the customers. For instalment loans for professional purposes, there is a separate acceptance and authorisation framework in which the limits are set in accordance with the Business Credit Management Standard.

In addition, the retail portfolios are monitored within the RAF for credit risk indicators – partly based on the internal A-IRB rating models for mortgage portfolios – with regard to default (PD (probability of default), PiT PD (point in time PD), delinquency, default, LGD (loss given default)), EPC scores (energy performance certificate) and flood risk, and targeted analyses.

These analyses form the basis of regular reporting to, and discussion within the GRC Financial Risk Committee, the Executive Committee and the Risk Committee of the Board of Directors.

Both in Belgium and the Netherlands, specialised teams (the “Curative Management” team and the “Special Management” team) work on the default portfolio. Their aim is to regularise credit files and, if not possible, to minimise financial losses. Since 2022 the emphasis has been placed on implementing the EBA guidelines for the initiation and monitoring of loans, including the proactive detection and monitoring of elevated credit risk in the mortgage loan portfolios (via EWIs), valuing property serving as collateral (physical and desktop valuations), integrating climate risk (more specifically transition risk, but gradually physical risk too) into the risk management framework. For the Netherlands specifically, mitigating the risk of interest-only loans also plays a role.

These different initiatives are monitored by the relevant value stream and supported through the operations of the GRC Financial Risk Committee and the Delivery Committee, with reporting to the Executive Committee and to the Risk Committee of the Board of Directors.

The non-retail investment framework focuses on high-quality counterparties, with a focus on significant diversification between investments in national governments, financial institutions, corporates, indirect real estate, structured products such as RMBS, covered bonds, securities of or loans to local authorities and public-private partnerships (PPPs). In addition, these portfolios are monitored within the RAF for credit risk indicators such as average portfolio rating, large exposures, out-of-limit positions, and climate risk indicators such as carbon transition and environmental score.

The application and practical implementation of the investment policy is also supported by the Investment Consultation (IO), in which representatives of the Executive Committee (in the case of escalation), Treasury and Investment Management (TIM), Treasury & Investment Services (TIS), Legal and the Credit Risk Analysis (CRA) department as the first line, and Risk as the second line, are represented.

The internal investment framework establishes the positions and the ratings that may be considered for investment, and up to what amount. The ratings of all interest-bearing securities are then systematically monitored via the Rating Consultation (RO).

The banking, corporate, PPS and property counterparties, and also the local and regional authorities, are monitored continuously by the CRA department credit analysis. In addition to an assessment of historical performance, the analysis includes the impact of future market developments, sensitivity analyses and climate risk (more specifically transition risk). An internal rating is obtained that accurately reflects the creditworthiness, including an estimation of future developments through an internal rating outlook. This forms a crucial part of the credit risk process and the correct analysis of the general creditworthiness of the different portfolios. Special attention is given to the flashing lights that may indicate a potential change in creditworthiness, and may result in potential action.

CRA gives an explanation at the monthly Rating Consultation (RO), which reports to the Alco. This consultation ratifies proposed internal ratings or decides on the assignment of internal ratings, following a well-defined governance framework with two separate decision levels. The internal ratings are relevant in the acceptance framework and are also used for monitoring. The full investment portfolio also undergoes a thorough analysis on a quarterly basis. This analysis and the individual counterparty analyses form the basis of the regular reporting to, and discussion in, the Alco via the first-line report, the Executive Committee and the Risk Committee of the Board of Directors.



To manage the reinsurer insurance risk, the Company uses the services of a reinsurance broker to place the reinsurance contracts in the market. To limit the credit risk, the contract concluded with reinsurance broker stipulates that all reinsurers are required to maintain a minimum of an A minus rating.

Internal models for credit risk

The capital requirements at Aspa are determined via A-IRB models for mortgage loans in Belgium and the Netherlands and via F-IRB models for corporate, banking and property counterparties within the investment portfolio. As a result of the implementation of the new definition of default in 2020, the development of these models continued in the course of 2021. The non-retail models, for which the application was submitted in 2021, were approved in 2022. Approval for the Belgian retail models, for which the application was submitted in 2021, was obtained in the course of 2023. The approval for the Dutch loan portfolios, for which the application was submitted in 2022, was obtained in early 2024. This led to a decrease in the risk-weighted assets by EUR 1.8 billion.

Maximum credit risk

The total credit risk exposure of the Bank Pool consists of the carrying amount of financial assets on the balance sheet (the major part of the asset side of the balance sheet), the calculated exposure to financial derivatives, and specific off-balance-sheet items (including securities purchases in progress, credit commitments and financial guarantees) as specified in the (Basel) equity regulations. The table below shows the outstanding credit risk of the Bank Pool as reported in the prudential COREP tables. For the off-balance sheet exposures, this is the maximum exposure (before the application of the conversion factors, the so-called “credit conversion factor” or “CCF” in the Basel regulations). The Pillar 3 Disclosures give further information and interpretation of this total exposure.

	31/12/2023	31/12/2024
Total on-balance sheet	53,509,172,171	55,428,374,178
Total off-balance sheet	2,879,439,587	3,256,264,931
Total derivatives	378,412,720	305,716,895
Total exposure to credit risk	56,767,024,478	58,990,356,005

The maximum exposure to credit risk in the Insurance Pool consists largely of on-balance-sheet positions and amounts to EUR 6,581,985,757 as of 31 December 2024, compared with EUR 6,219,036,300 as of 31 December 2023. More specifically the credit risk in relation to reinsurance contracts on 31 December 2024 is EUR 27.3 million. For insurance contracts, there is currently a limited credit risk of EUR 3.0 million.

Collateral and other forms of credit improvement

For mortgage loans, in accordance with the acceptance frameworks, collateral, i.e. mortgage registrations in the Netherlands and mortgage registrations and/or powers of attorney in Belgium, is established on the homes/real estate that are used as collateral. These homes are valued at inception and during the term of the loan according to the valuation rules contained in the Retail Credit Management standard with the valuation of collateral with the guiding principles with which Argenta is required to comply. The guiding principles are based on the Capital Requirements Regulation (CRR), the EBA and ECB guidelines, and the EBA guidance with regard to loan origination and monitoring. Improvements were implemented in the property valuation processes for the Belgian portfolio, including the recording of energy performance certificates and energy labels as part of the collection and reporting of information on the energy efficiency of real estate exposures. A strategy for sustainability and improving the energy efficiency of properties in the Belgian portfolio was approved in Q1 2024, further improving the energy efficiency of the properties pledged as collateral.



A renovation scan tool was launched in which various renovation scenarios are developed to support customers in renovating their property and making it more sustainable. The Argenta Green Lending loan component was launched for the Dutch portfolio, offering customers loans at a more favourable interest rate to make their homes more sustainable. Far-reaching preparations were also made for the introduction of an energy label discount, under which customers receive a discount on their interest rate if they have a favourable energy label. This encourages customers to make their homes more sustainable and obtain a new definitive energy label.

Valuations are made at the time of application for the loan by an expert, supplemented by a (desktop) appraisal in accordance with the rules defined in the acceptance frameworks in Belgium and the Netherlands. Individual valuations can also be made at the start of a foreclosure procedure. Counterparties with large exposures (above EUR 3,000,000) are monitored annually to determine whether a more recent expert estimate has been made on the underlying guarantees and also for loans in default where the exposure is greater than EUR 300,000.

In addition, the values of the collateral in the portfolio are regularly indexed to ensure an accurate valuation of the portfolio. This indexation is carried out annually within the Belgian portfolio, and on a quarterly basis within the Dutch portfolio, on all the properties pledged as collateral for an active mortgage loan (these are properties with a mortgage registration or power of attorney whose end date has not been reached). The indexation is based on the latest voluntary and forced sale value after renovations estimated by the expert or, in the absence of any physical estimate value, the first voluntary and forced sale value after renovations at the start of the loan. These values are indexed on the basis of a statistical methodology.

Thanks to this collateral, in the event of default, it is possible, if necessary and following judicial intervention, to proceed with the forced sale of the property to recover the loan repayment.

In addition to the mortgage registration, a portion of the Dutch mortgage loans are guaranteed by insurance policies pledged to Argenta and the National Mortgage Guarantee (NHG) to which recourse can be made in the event of default.

Collateral can also be requested for professional instalment loans if deemed necessary. These are the seller's subrogation lien and director's joint and several suretyship.

In the first case, the lender assumes the statutory lien of the unpaid seller with retention of title through subrogation. In practice, the use of the unpaid seller's lien as collateral for the financing of movable assets is done through conventional subrogation. Through subrogation, the lender to the buyer of the movable asset, takes the place of the seller, thus obtaining a lien on the price of the movable asset in case of sale (including by court order).

The second option is a director's joint and several suretyship. A suretyship is an agreement in which a person other than the borrower commits to being jointly responsible for the borrower's credit obligations. Thus, at the time the borrower defaults on its commitments, the bank can call on the guarantor to pay in place of the borrower. The guarantor in turn can then go to the borrower to recover the amounts it has paid.

In the case of non-retail securities and loans, collateral or credit protection exists to a limited extent. This only takes the form of guarantees from local, regional or central governments or from the companies affiliated with the counterparty. In the case of guarantees with counterparties, these guarantees are incorporated into the expected credit losses by using the guarantor's rating as final rating of the security or loan in the calculation.

The collateral given does not lead to the recording of an asset on the Company's balance sheet.

During 2024, no significant negative changes took place in the quality of the collateral present. However, a cooling of the housing market in Belgium has been observed in terms of transaction volumes and to a lesser degree also in the area of house prices. In the Netherlands, the mortgage market is rising again after a weaker 2023. This is true for both volumes and house prices.



Concentration of credit risk

Concentration risk is the risk associated with having a large concentration of loans or securities with an individual counterparty or a group of related counterparties (counterparty concentration) or as a consequence of an uneven distribution across markets, sectors or countries/regions (sector concentration). The latter occurs when significant risk positions are taken on counterparties whose probability of default and/or loss in case of default are driven by common underlying factors.

The table below shows, for the retail portfolio, the percentage distribution of the different types of loans and advances within the category “Loans and advances”.

	31/12/2023		31/12/2024	
	Carrying amount	%	Carrying amount	%
Advances and overdrafts	3,059,280	0.01%	5,413,392	0.01%
Consumer loans	427,815,655	1.05%	451,152,420	1.05%
Mortgage loans Belgium	18,470,210,535	45.42%	19,072,197,152	44.59%
Mortgage loans Netherlands	21,586,098,892	53.09%	23,059,479,081	53.91%
Term loans	174,731,922	0.43%	182,664,878	0.43%
Total	40,661,916,285	100.00%	42,770,906,923	100.00%



Possible concentration risks resulting from the presence in only two mortgage markets (Belgium and the Netherlands) are tempered by the granular nature of these portfolios consisting of a very large number of files each individually carrying a very limited credit risk, by the diversification in the age and repayment of the credit, the demographic spread and the regional spread within Belgium and the Netherlands.

The concentration risk with regard to the reinsurers is limited by placing the coverage with multiple re-insurance companies. Further information about reinsurance is included in the notes regarding the insurance risk.

The Company's non-retail portfolio consists of investments in fixed-income securities and lending to local and regional authorities and public-private partnerships.

	31/12/2023		31/12/2024	
	Carrying amount	%	Carrying amount	%
Financial assets at fair value through other comprehensive income	4,759,229,924	100.00%	4,382,271,921	100.00%
Debt securities				
Public and regional authorities	1,329,172,870	27.93%	1,120,535,969	25.57%
Credit institutions	1,044,923,620	21.96%	898,958,681	20.51%
Other financial institutions	799,095,085	16.79%	891,755,529	20.35%
Other institutions	1,586,038,348	33.33%	1,471,021,742	33.57%
Financial assets at amortised cost	8,468,840,022	100.00%	8,619,942,977	100.00%
Debt securities				
Public and regional authorities	1,545,430,547	18.25%	1,900,525,159	22.05%
Credit institutions	2,260,521,405	26.69%	2,161,526,896	25.08%
Other financial institutions	737,674,336	8.71%	762,173,660	8.84%
Other institutions	2,574,527,279	30.40%	2,517,907,010	29.21%
Term loans	1,310,244,727	15.47%	1,235,618,728	14.33%
Leasing	40,441,728	0.48%	42,191,523	0.49%
Non-trading financial assets mandatorily at fair value through profit or loss	106,229,924	100.00%	107,829,888	100.00%
Debt securities				
Public and regional authorities	0	0.00%	0	0.00%
Credit institutions	24,660,250	23.21%	24,332,641	22.57%
Other financial institutions	21,384,204	20.13%	25,207,824	23.38%
Other institutions	60,185,470	56.66%	58,289,423	54.06%



The table below provides a geographical breakdown of the non-retail portfolio. It documents a large exposure to Belgium (the Company's head office location).

	31/12/2023	31/12/2024
Belgium	27.40%	25.15%
The Netherlands	16.34%	16.49%
France	14.93%	15.48%
Germany	6.90%	6.14%
Spain	5.30%	5.35%
Luxembourg	5.15%	5.08%
Austria	3.49%	4.99%
Finland	2.76 %	3.47%
Sweden	3.42%	3.21%
Ireland	2.27%	2.03%
Slovakia	0.92%	1.68%
Denmark	1.39%	1.24%
Iceland	1.41%	1.15%
Poland	1.08%	1.11%
United States of America	1.10%	1.05%
Other	6.14%	6.38%
Total	100.00%	100.00%

The Company applies concentration limits per counterparty expressed as a percentage of CET-1 regulatory core capital. The size of the limit depends on the creditworthiness of the issue and on the type of counterparty. The diversification and internal ratings of all fixed-income securities are systematically reported and monitored, at individual and at portfolio level.

Expected credit losses (ECL) (stage 1 and stage 2)

Inputs, assumptions and techniques

Impairments on the financial instruments in the retail portfolio, including loans to professional customers, are determined on the basis of a scenario-weighted model in which the ratings are based on current and past information, while the scenarios make forecasts for the future. The ECL are calculated as the weighted average of the credit losses under three macroeconomic scenarios. The credit losses are calculated by applying the probability that a borrower will default to the expected exposure in the event of default, taking into account the expected loss in the event of default, discounted at the effective interest rate of the instrument and adjusted for the credit's survival chances.

The ECL are calculated for the relevant period from the reporting date, being 1 year (stage 1) or the entire remaining life of the contract (stage 2).

- The probability of the borrower defaulting ("Probability of Default" – PD) is determined by a PD model (the Company has separate PD models for Belgian and Dutch mortgages, as the characteristics differ between the two mortgage markets) that takes into account the individual characteristics of the instrument (internal rating category, historical performance), based on a "through-the-cycle" (TTC) component (average macroeconomic conditions) and a "point-in-time" (PIT) component (forward-looking macroeconomic conditions);



- Exposure at default (EAD) is calculated on the reporting date and over the life of the instrument and includes both on- and off-balance sheet exposures. The on-balance sheet exposure consists of the sum of the outstanding capital plus any arrears. The projection of the on-balance sheet exposures over the remaining term takes into account the contractual repayments. Off-balance sheet exposures (being the credit pipeline, unused credit lines and building deposits) are included based on the modelled expected conversion and take-down. The EAD for the Dutch portfolio is corrected for the likelihood of partial prepayment. For Belgian and Dutch mortgages, an additional assessment was made with regard to inflation risk for loans with high DSTI/LTI and weak energy labels;
- Loss given default (LGD) is a measure of the expected loss on a loan if this counterparty defaults. This factors in the likelihood that the customer will be able to resume his payment obligations over time (the “cure rate”), the expected recovery and realisation value of the collateral involved and characteristics of the loan. In addition, a risk of maturity was assessed for Dutch mortgages with an interest-only component, if the capital is only repaid at maturity;
- A credit's survival chances are defined as the probability that a credit at the start of a specified period:
 - (i) is not fully repaid or
 - (ii) is not in default or disappears from the portfolio after default;
- Effective interest is the return on the loan on an annual basis, taking into account all direct costs. Owing to the limited impact of direct costs on the effective interest rate, the contractual interest rate is used as an approximation;
- The models used for IFRS 9 are “best estimate” calibrated. Management overlays are not currently applied. However, additional staging criteria are used, in addition to what the internal methodology assumes as minimum criteria. Further information about the effect of the additional staging criteria can be found in Note 36 Impairments.

Impairments on the non-retail portfolio are determined by mapping the current value of the cash flows that would be lost if a debtor defaulted, discounted at the effective interest rate of the instrument. The probability of the debtor defaulting over a certain period is applied to this.

- Cash flows from a financial instrument are determined based on the prospectus (or equivalent document) of the asset. The Company does not estimate the likelihood of early redemptions and projects cash flows to maturity or the instrument's first call date where applicable and relevant;
- The effective interest rate is determined, on initial recognition, at instrument level, as the annual interest rate over the life of the asset, taking into account coupon payments and any difference between the fair value of the instrument when recorded on the balance sheet and its nominal value;
- The PD is determined on the basis of external Standard & Poor's (S&P) information. This is because, to date, no defaults have occurred in Argenta's non-retail portfolio and no in-house data are therefore available. Various adjustments are made to the external data to determine an average long-term migration matrix. After this the long-term PDs from the matrix are converted into expected PIT PDs. A migration matrix sets out the probabilities of the current ratings to migrate at one year to all the other ratings or unchanged rating, including the probability of default;
- The LGD percentages are, by default, based on the Basel FIRB approach (covered: 11.25%; senior unsecured: 45%; subordinated: 75%), but deviations are possible for specific files after approval by the Alco.

Incorporation of forward-looking (FL) information

For the retail portfolios, including loans to professional customers, macroeconomic FL information is included both in the ECL calculations and in determining the PIT LT PD (Point-in-time Lifetime Probability of Default). For the ECL and PIT LT PD, three different scenarios (soft landing, hard landing and stagflation) are calculated based on macroeconomic expectations, with the scenarios (including the weighting of each scenario) being the same as those used for the internal budgeting process. The soft landing scenario is based on the macroeconomic projections that the central banks (ECB, NBB and DNB) announced in December 2024. The soft-landing scenario has the greatest weighting at 45%. The stagflation scenario and the hard landing scenario are alternative scenarios drawn up internally and have a weighting of 20% and 35%, respectively.



The relevant macroeconomic expectations relate to the expected evolution of the unemployment rate (for PD) and the house price index (for LGD). Statistically, it is established that the PD parameter is mainly influenced at portfolio level by the unemployment rate. This is also the case for the LOA portfolio. In addition, house price developments and interest rates also play a role. The loss given default is mainly affected by house prices. This is also shown by statistical research. The ECL and PIT LT PD is an average of the three scenarios weighted with their weights.

The inclusion of FL information in the non-retail portfolio is achieved by modelling the historical rating migration matrices (based on external S&P data for the eurozone) and their relationship to macroeconomic factors. These relationships are then used to determine FL rating migration matrices in which the Point In Time (PIT) PDs are present.

The economic indicators include the real GDP growth, the change in unemployment level, the change in headline inflation and the starting level of the 10-year government bond yield in the eurozone. In calculating the PIT PDs, the same different scenarios are taken into account per system factor per year and with a weighting per scenario. The scenarios and their weightings are determined internally based on the Company's business plan. The final FL PIT PDs are reviewed at least semi-annually and are approved by the Alco. The scenarios and their weightings are established every least six months (for Q2 and Q4) and are approved by the Alco.

Further information about the weightings used for the different scenarios and the FL information is included in Note 36 Impairments.

Significant increase in credit risk and low risk exception

Within the retail portfolio, including loans to professional customers, the Company identifies any significant increase in credit risk since initial recognition of the instrument through a quantitative analysis and/or based on qualitative indications. A number of safety net indicators have also been included which automatically lead to a migration of an instrument to stage 2. The staging models have been adjusted to the specificity of the Company's various retail portfolios.

The quantitative analysis is based on the ratio of the lifetime PD between the time of reporting and the time of the instrument's initial recognition.

The qualitative indications and safety net indicators include a number of criteria that were not included in the PD model. The following qualitative elements, among others, lead to the recording of an instrument in stage 2:

- Attributing of a forbearance measure to an instrument;
- Unlikelihood to pay (UTP) score on an instrument that did not lead to the recording of the instrument as non-performing;
- Recording of the instrument as non-performing in the past 12 months;
- More than 30 days' arrears on contractual payments (backstop).

Apart from the above automatic criteria, the Company assesses whether certain sub-portfolios are estimated to carry an increased risk of loans not being fully and timely repaid and should therefore be classified under Stage 2. To this end, loans were identified that are at an increased risk because of high energy costs and prices.

In the Dutch mortgage portfolio, allocation to stage 2 is also applied to bullet loans when the borrower gets a negative result on the affordability test, or when there is no recent information available on the affordability of the sum at maturity.

The Company does not make use of the low credit risk exemption for retail instruments. This means that on every reporting date an analysis of the increase in credit risk is done for all instruments. The assumption that a significant increase in credit risk has occurred with contractual payments that are more than 30 days in arrears is not refuted.

In the non-retail portfolio, the Company identifies a significant increase in credit risk since initial recognition of the instrument via a negative revision of the creditworthiness of the related counterparty or based on an ad hoc internal analysis.



The staging of non-retail securities and loans is based on internal credit ratings or, where these are not available, on external credit ratings, and can be summarised as follows:

- Stage 1: contains instruments with investment grade counterparties and counterparties that, at the time of recognition, had a non-investment grade rating without negative revision;
- Stage 2: counterparties with an investment grade or non-investment grade rating on initial recognition that have been negatively revised to non-investment grade or (in the event of initial non-investment rating) one credit score lower. Deviations to this rule are permitted only if there is no significant credit deterioration and with the approval of the Rating Consultation (RO).

In addition to the standards listed above, there are a number of triggers that may require an ad hoc analysis of the counterparty's internal rating:

- When a rating agency negatively revises the creditworthiness of a counterparty;
- Regional crisis;
- Negative news about a counterparty;
- Mergers and acquisitions.

If the ad hoc analysis leads to a negative revision of the internal creditworthiness assessment of the counterparty (to non-investment grade or reduction by a grade for non-investment grade), the instrument migrates from stage 1 to stage 2. Counterparties with neither an internal nor an external rating are assessed at instrument level on the basis of expert knowledge. For the staging, overarching country and/or sector risks are also taken into consideration. All counterparties falling into this category are then placed on a watch list for closer monitoring, and migrate to stage 2 based on a decision of the Rating Consultation.

The Company uses the low credit risk exemption for non-retail instruments, under which an instrument is assumed to have low credit risk if the creditworthiness is considered 'investment grade'. This corresponds to a minimum S&P credit rating of BBB-.



Grouping of financial instruments

The Company does not use grouping of instruments based on common credit risk characteristics to model parameters for ECL.

Changes in inputs, assumptions and techniques

IFRS 9 models for mortgages were further developed in 2024 to align them with the new IRB models. For Belgian mortgages, this led to a EUR 0.8 million increase in non-default impairments and, for Dutch mortgages, a limited decrease in non-default impairments of EUR 0.1 million.

Finally, a new model was developed for Belgian mortgages in default, leading to a EUR 3.6 million reduction in default impairments. This model takes into account the time value of amounts receivable in the future and macroeconomic scenarios. A new model for Dutch mortgages in default is being developed and will be implemented in 2025.

A new PD and LGD model was also developed for instalment loans. This led to a fall in impairments of EUR 0.6 million. Finally, a new PD, LGD and EAD model was also developed for current accounts. This led to an increase in impairments by EUR 0.8 million.

For the non-retail PD model, the following variables were adjusted in the annual recalibration of the regression function of the economic variables and the historical migration matrices:

- The level of real GDP growth rather than the change in growth;
- Addition of the starting level of the 10-year government bond yields.

Default, non-performing and credit-impaired (stage 3)

A loan receivable is considered to be in default once it is 90 consecutive days in arrears in a material amount (more than EUR 100 and 1% of exposure for retail credit portfolios), or where there are a number of signals, other than arrears, that the borrower will be unable to meet its obligations (“unlikely to pay” or “UTP”). There are UTP indicators that immediately give rise to UTP default on an individual basis (UTP hard), and there are also UTP indicators that in combination give rise to UTP default, but not on an individual basis (UTP soft).

Interest-only loans in the Dutch portfolio were analysed to see whether the customers can repay their loans on the maturity date without enforcement of the underlying collateral. If enforcement would be necessary, then in accordance with the CRR the loan must be regarded as stage 3. As of 31 December 2024, uncertainty remained about whether or not enforcement will prove necessary for a total outstanding amount of EUR 0.78 billion in loans concluded before 2013. This is because there was no or insufficient information available for these loans on the creditworthiness of the customers that they would be able to repay the outstanding balance without resorting to the enforcement of the collateral. The risk of underestimating the expected credit loss provision is very limited, given the current forced sale value of the properties, the insurance policies and the guarantees received from the Dutch government. The average LTV on these contracts is actually only 42.55%. In the table above these loans are recorded in stage 1 and stage 2.

The Company applies equal treatment to default, non-performing and credit-impaired situations. Individual impairments are determined based on defaulted receivables calculated as the difference between the outstanding receivable and the expected recoveries.

In calculating stage 3 impairments, the Company uses a model for the Belgian mortgage portfolio that is based on the A-IRB model for loans in default and additionally takes into account the expected changes in house prices according to internal macroeconomic scenarios.



For Dutch mortgages, the Company uses one single scenario, and does not apply discounting. The impairment takes account a downside scenario in which the market value of the collateral decreases by at least 20%. Annually, a back test is carried out to see whether this haircut is sufficient and whether the impairments are sufficient to cover the losses in the event of enforcement of the collateral. In 2025, a model based on the A-IRB model for loans in default that also takes into account expected changes in house prices, will be implemented for Dutch mortgages in stage 3.

The table below gives an overview of the stage 1, 2 and 3 receivables per category of financial instruments and the transfers between stages.

	31/12/2023			31/12/2024		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Financial assets at amortised cost	44,035,610,820	5,102,209,267	183,182,431	46,230,313,108	5,173,367,267	181,780,845
Debt securities	7,044,086,318	90,248,021	0	7,274,181,554	87,319,188	0
Loans and advances	36,991,524,502	5,011,961,246	183,182,431	38,956,131,554	5,086,048,078	181,780,845
of which lease receivables	40,441,728	0	0	42,191,523	0	0
Financial assets at fair value through other comprehensive income	4,719,088,262	40,141,662	0	4,338,939,677	50,634,964	0
Debt securities	4,719,088,262	40,141,662	0	4,338,939,667	50,634,964	0
Equity instruments						
Total financial assets	48,754,699,082	5,142,350,928	183,182,431	50,569,252,785	5,224,002,230	181,780,845
Loan commitments, financial guarantees and other commitments	3,022,111,484	120,388,857	0	3,677,557,523	81,129,312	0
of which purchased credit-impaired financial assets	0	0	0	0	0	0

31/12/2023	Transfers between stage 1 and stage 2		Transfers between stage 2 and stage 3		Transfers between stage 3 and stage 1	
	To stage 2 from stage 1	To stage 1 from stage 2	To stage 3 from stage 2	To stage 2 from stage 3	To stage 3 from stage 1	To stage 1 from stage 3
Financial assets at amortised cost	928,027,509	1,629,606,493	48,399,855	26,792,007	17,827,430	1,020,251
Debt securities	49,453,803	0	0	0	0	0
Loans and advances	878,573,706	1,629,606,493	48,399,855	26,792,007	17,827,430	1,020,251
of which lease receivables	0	0	0	0	0	0
Financial assets at fair value through other comprehensive income	15,281,364	0	0	0	0	0
Debt securities	15,281,364	0	0	0	0	0
Equity instruments						
Total financial assets	943,308,873	1,629,606,493	48,399,855	26,792,007	17,827,430	1,020,251
Loan commitments, financial guarantees and other commitments	12,827,293	11,983,512	0	0	0	0



31/12/2024	Transfers between stage 1 and stage 2		Transfers between stage 2 and stage 3		Transfers between stage 3 and stage 1	
	To stage 2 from stage 1	To stage 1 from stage 2	To stage 3 from stage 2	To stage 2 from stage 3	To stage 3 from stage 1	To stage 1 from stage 3
Financial assets at amortised cost	2,220,643,623	1,975,458,457	45,058,861	34,246,326	19,334,307	521,984
Debt securities	0	0	0	0	0	0
Loans and advances	2,220,643,623	1,975,458,457	45,058,861	34,246,326	19,334,307	521,984
of which lease receivables	0	0	0	0	0	0
Financial assets at fair value through other comprehensive income	0	0	0	0	0	0
Debt securities	0	0	0	0	0	0
Equity instruments						
Total financial assets	2,220,643,623	1,975,458,457	45,058,861	34,246,326	19,334,307	521,984
Loan commitments, financial guarantees and other commitments	5,152,477	15,688,555	0	0	0	0

The carrying amount of loans and advances in stage 2 increased slightly from EUR 5,102,209,267 to EUR 5,173,367,267 and remained at a similar level in stage 3 compared with 2023. However, in 2024 there were significant migrations to stage 2 from stage 1 of EUR 2,220,643,623 and from stage 2 to stage 1 of EUR 1,975,458,457.

In 2023, there were no changes to models or staging criteria. However, in 2024, the credit risk models for mortgages were updated, resulting in greater movement regarding quantitative staging criteria. Additionally, for the Dutch mortgage portfolio, staging criteria for interest-only loans were adjusted to ensure compliance with ECB expectations. This adjustment caused a shift of interest-only loans between Stage 1 and Stage 2.



The table of changes below gives an overview of the stage 1, 2 and 3 impairments.

	01/01/2023	Origination and acquisition	Derecognition	Changes in credit risk	Changes due to update of the methodology for estimation	Write-offs	Other	31/12/2023
Stage 1	-13,839,466	-2,793,209	2,232,720	-1,491,376	-112,537		-87,587	-16,091,454
Debt securities	-8,337,170	-864,589	318,914	-760,615	0		0	-9,643,460
Loans and advances	-5,502,295	-1,928,621	1,913,806	-730,761	-112,537		-87,587	-6,447,994
Stage 2	-17,717,644	0	6,873,723	-15,522,543	221,060		-826,388	-26,971,791
Debt securities	-2,913,799	0	261	-11,485,330	0		0	-14,398,868
Loans and advances	-14,803,845	0	6,873,462	-4,037,212	221,060		-826,388	-12,572,923
Stage 3	-25,229,502	0	5,415,182	-11,196,849	0	4,446,588	0	-26,564,580
Debt securities	0	0	0	0	0	0	0	0
Loans and advances	-25,229,502	0	5,415,182	-11,196,849	0	4,446,588	0	-26,564,581
Provisions for loan commitments, financial guarantees and other commitments	-1,338,198	-2,000,496	2,327,532	13,436	-24,905	0	-13,808	-1,036,440
Stage 1	-775,670	-2,000,496	1,885,313	230,612	-42,315		-511	-703,066
Stage 2	-562,528	0	442,219	-217,176	17,409		-13,298	-333,373
Stage 3	0	0	0	0	0	0	0	0
Total	-58,124,809	-4,793,705	16,849,157	-28,197,332	83,618	4,446,588	-927,782	-70,664,265



	01/01/2024	Origination and acquisition	Derecognition	Changes in credit risk	Changes due to update of the methodology for estimation	Write-offs	Other	31/12/2024
Stage 1	-16,091,454	-2,544,369	1,864,803	7,758,070	1,733,664		0	-7,279,288
Debt securities	-9,643,460	-1,003,556	424,354	5,834,522	0		0	-4,388,141
Loans and advances	-6,447,994	-1,540,813	1,440,449	1,923,548	1,733,664		0	-2,891,147
Stage 2	-26,971,791	0	5,071,719	-10,615,422	-2,850,745		-16,351	-35,382,590
Debt securities	-14,398,868	0	8,132	-7,891,860	0		0	-22,282,596
Loans and advances	-12,572,923	0	5,063,587	-2,723,562	-2,850,745		-16,351	-13,099,994
Stage 3	-26,564,580	0	2,813,035	-6,801,808	3,200,027	3,674,849	0	-23,678,477
Debt securities	0	0	0	0	0	0	0	0
Loans and advances	-26,564,581	0	2,813,035	-6,801,808	3,200,027	3,674,849	0	-23,678,477
Provisions for loan commitments, financial guarantees and other commitments	-1,036,440	-1,573,707	1,879,617	68,696	-743,064	0	-40	-1,404,938
Stage 1	-703,066	-1,573,707	1,632,844	270,044	-709,289		0	-1,083,174
Stage 2	-333,373	0	246,772	-201,347	-33,775		-40	-321,763
Stage 3	0	0	0	0	0	0	0	0
Total	-70,664,265	-4,118,076	11,629,173	-9,590,463	1,339,882	3,674,849	-16,391	-67,745,292

The receivables in stage 3 amounting to EUR 181,780,845, and EUR 23,678,477 of impairments have been recorded on 31 December 2024 (13.03% coverage ratio). For the stage 3 outstanding receivables, the Company holds collateral (in the form of immovable property) with an estimated value of EUR 151,027,101.

The other movements include the increase in stage 2 and 3 impairments owing to the recognition of off-balance-sheet commitments (loan commitments) and changes due in adjustments to methodology, assumptions and techniques.

For the assets recorded at amortised cost, the expected credit losses are deducted from the financial assets. For the financial assets measured at fair value through comprehensive income, the expected credit losses form part of other comprehensive income. The expected credit losses of the off-balance sheet items (loan commitments, financial guarantees and other commitments) are recorded as provisions.



Write-off method

A detailed description of the write-off method is included in the valuation rules in the “Write-offs” section.

If payments are still received, for credits written off according to the above criteria, or if the Company still expects possibilities of recovery, these loans will continue to be monitored by the credit specialists of the Curative Management sub-department. In the Netherlands, this task is undertaken by the NL Coordinator Special Management. Proceedings continue as long as the cost-benefit analysis remains positive. Limitation periods are tracked and interrupted where necessary.

Contract modification and Forbearance

Forbearance measures can be granted by the Company to a debtor who is unable or will soon be unable to meet his financial obligations. These forbearance measures are agreed in direct consultation between the counterparty and the servicer or the NL Coordinator Special Management (for Dutch loans), or the Company's Curative Management (for Belgian loans). The following measures are permitted:

- Cancellation of penalties (specifically for Dutch loans);
- Conversion of repayment form or interest (specifically for Dutch loans);
- Interest rate averaging (specifically for Dutch loans);
- Interest pause (specifically for Dutch loans);
- Maturity extension (for Dutch and Belgian loans);
- Deferral (for Dutch and Belgian loans and advances);
- Payment agreements (for Dutch and Belgian loans).



The granting of a forbearance measure is a qualitative indicator for identifying a significant increase in credit risk, and automatically leads to migration to stage 2. Migration to stage 1 is possible once the forbearance measure and the 24-month probationary period have ended and there are no other indications for stage 2. If during the current probationary period arrears of more than 30 days occurs, or an additional forbearance measure is granted, then the loan migrates to stage 3. Migration to stage 2 from stage 3 is possible once there are no other active reasons for default and the 12-month probationary period has ended. If there are no arrears, no current procedures or a recent registration of a UTP indicator, the loan migrates to stage 2, either automatically or following a manual assessment by the Curative Management managers.

In the Netherlands, forbearance measures follow a similar process, with manual assessments being handled by the Special Management sub-department.

In general, there are no specific criteria for migrating to stage 1. On the reporting date, all the staging triggers are assessed and (for the quantitative trigger) compared to the moment of origination. Apart from the stage 2 criterion (“in default during the last 12 months”), no comparison is made with a previous reporting date.

	31/12/2023	31/12/2024
Gross carrying amount of exposures with forbearance measures	234,462,876	198,902,170
Performing exposures with forbearance measures	172,135,831	144,603,636
Non-performing exposures with forbearance measures	62,327,045	54,298,533
Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions	5,522,437	4,710,633
Collateral and financial guarantees received	206,140,964	173,937,643

The decrease in exposure with forbearance measures is falling due to the expiration of forbearance statuses for COVID-related forbearance measures and the deactivation of forbearance measures granted during the energy crisis.

4.1.4. Underwriting risks

Exposure

The underwriting risk generally includes all risks associated with the nature of the underwriting of insurance activities. It is the risk of a negative change in the financial situation, caused by the difference between expected and actual payments.

For property and casualty insurance, the results depend mainly on the degree to which actual claims payments correspond to the principles applied in pricing products and in determining the level of the technical provisions. For life insurance, the underwriting risk consists of, among other things, the risk of deviating surrender behaviour, deviating benefits (in the event of death), deviating assessment of the medical risk, deviating estimate of the intention to take out the life insurance (reference to AML risks) and policy costs. In health insurance, both types of risk – those specific to life insurance and those specific to casualty insurance – exist together.

The main underwriting risks are mortality risk, risks arising from charges, lapse risk, premium and reserve risk and catastrophe risk.

The mortality risk is the risk of loss or of an adverse change in the value of insurance liabilities caused by changes in the level, trend or volatility of mortality rates, where an increase in the mortality rate leads to an increase in the value of insurance liabilities. The major part of the mortality risk comes from underwriting outstanding balance insurance.

The cost-related risk is the risk of loss or of adverse change in the value of insurance liabilities caused by changes in the level, trend or volatility of the costs of fulfilling insurance or reinsurance contracts. The development and pricing of insurance policies is based on, among other things, assumptions about the cost of acquiring and processing policies and of managing claims. Reasons for increased cost-related risk include having a larger portion of long-term contracts, deviations from the assumptions used and a rise in cost inflation.

The lapse risk is the risk of loss or of adverse change in the value of insurance liabilities caused by changes in the level or volatility of the percentages of (early) terminations, extensions or surrenders. With an increase in policy costs, the insurance company runs the risk that the initial policy handling costs cannot be recovered in time and of losing the profits from future premiums. A lower number of surrenders of onerous contracts can pose the same risk.

The premium and reserve risk is the risk of loss or adverse change in the value of insurance liabilities due to volatility in the timing, the frequency and severity of claim events, and in the timing and amount of claim settlements. Premium risk relates to claims arising after reporting date (i.e. during the remaining life of the contract), and reserve risk relates to claims occurring before reporting date.

Catastrophe risk is the risk of loss or of adverse change in the value of insurance liabilities caused by uncertainty about pricing and technical provision assumptions related to extreme or exceptional events. Catastrophe risk relates mainly to natural or man-made disasters. This risk occurs mainly in property and casualty insurance. For life insurance this includes the risk of increased mortality due to a pandemic or to natural or man-made disasters. In life insurance, this risk affects primarily outstanding balance insurance.

Risk management

The Company applies a clearly defined acceptance policy that is focused on well-defined target groups. In developing new products all identifiable components of the underwriting risk are taken into account for determining the acceptance, pricing and reservation policy.

Policies covering acceptance, remediation, pricing and reserve-setting are determined and adjusted by continuously monitoring the technical results, product profitability and portfolio profile, and evaluating the mortality tables and the adequacy of the technical provisions.



In its reservation policy, a distinction is made between “frequency files” with smaller claim amounts and heavy claims (above EUR 250,000 for bodily injury and above EUR 250,000 for fire damage). The policy for frequency files is situated upfront, in the annual determination by the Insurance Non-Life Department of the standard opening reserves, based on the historical cost of claims. This is a best estimate (realistic estimate) of the average cost of claims.

The policy with regard to heavy claims requires a tailor-made approach. These files are mapped by a process of constant evaluation of the interventions by the insurance undertaking, with analysis of the application of the insurance contract, of the conventions and exclusions, the approach taken to the claim, liability, the various liability allocation mechanisms, the deduction of the policyholder’s own portion and the addition of costs. The base is a fair estimate of the heavy claims (based on all the above items) plus a risk margin, given the potential sizeable fluctuations. This precision approach, with frequent revisions, is intended to minimise upward and downward fluctuations.

In addition, portfolios are monitored within the RAF on indicators such as combined ratio, value new business and new business margin life and LAT (liability adequacy test).

The adequacy of the technical provisions or LAT is tested in accordance with the Life Underwriting Risk standard. These are systematically examined for adequacy of the technical provisions. If the technical provisions are considered inadequate, a decision is made in most cases to assign supplementary provisions and/or adjust the pricing and risk acceptance strategies or to take other initiatives.

Aras also uses reinsurance to limit certain risks, to mitigate claims volatility and to optimise solvency ratios. The retention levels and limits of the reinsurance treaties are determined based on the Company’s acceptance policy and risk appetite and are enshrined in the “Reinsurance” policy. The VRC continuously monitors these risks and reports on them to the Audit Committee and the Risk Committee of the Board of Directors. Aras has fully reinsured itself for mortality risk in this regard.

Reinsurance is used in:

- Non-life:
 - Fire and Motor Fully Comprehensive: excess of loss per risk and per event;
 - Liability: excess or loss per risk in branches CL (civil liability), CL Motor, Passengers, CL Buildings and CL Private Life;
 - Fire and Motor Fully Comprehensive: annual aggregate excess of loss per event and Top&Top XL layer;
 - TRIP – Terrorism Reinsurance & Insurance Pool.
- Life: excess sums for individual death risk.

Unlike the Non-Life reinsurance programme, which must be renewed annually, the Life Reinsurance Program is a 3-year treaty, which was renewed at the end of 2019. This reinsurance programme offers mortality coverage. This means that Aras transfers part of the risk premium that Aras charges to customers to the reinsurers. In return, the reinsurer pays the death benefit upon the death of the customer. Just like the previous contract, it was decided – with retention of profit participation – to fully reinsure Aras for Life. The treaty negotiated in 2019 is a 2-year rolling treaty. In June 2022 there was an analysis of the cooperation with the leading reinsurer. The VRC decided to maintain the cooperation.

The table below shows the reinsurance premiums paid:

	31/12/2023	31/12/2024
Fire	3,621,431	4,499,469
Motor	2,119,892	2,378,296
Family	23,992	25,214
Life	17,440,385	17,918,271
Total	23,205,700	24,821,248

Reinsurance premiums paid are included in Note 18 in the tables of non-life reinsurance (fire, motor and family) and life reinsurance under the line "Allocation of reinsurance contracts paid". For life, the amount in Note 18 is EUR 19.7 million and includes the premium of EUR 17.9 million and EUR 3.7 million of costs due to profit sharing/settlement for previous financial years and EUR -2.0 million of premium spread. For non-life, the amount in Note 18 is EUR 7.1 million and includes the premium of EUR 6.9 million and EUR 0.3 million in brokerage fees.

The risk appetite for the underwriting risks of Aras is managed in the RAF via the following risk indicators:

- New Business Margin Life and Value New Business Life: value of Life production for the financial year if 8% ROE target is achieved compared to discounted premiums;
- LAT (Liability Adequacy Test) Life, Non-Life and Health: testing to see whether the technical provisions created are sufficient to meet future expected insurance liabilities;
- Non-Life Combined Ratio including reinsurance;
- Health Combined Ratio.

In addition to the aforementioned RAF indicators, further operational limits and flashing lights have been defined internally.

Sensitivity analysis

For Life insurance we consider the following scenarios with regard to the three main risks:

- Lapse: 40% reduction in the number of policies for natural persons;
- Expenses: 10% relative increase in costs together with a 1% absolute increase in cost inflation;
- Mortality risk: 15% relative increase in mortality probabilities.

The following table shows the impact of the scenarios on the market value of equity. Equity is valued in accordance with Solvency II principles since the Company manages insurance risks on the basis of Solvency II reporting. It is clear that the market value of equity is the most sensitive to changes in lapse. This is mainly driven by the Argenta Life Plan branch 23 insurance portfolio. A decline in the number of policies implies a decrease in future profits (fee income for the branch 23 investment funds). The impact is greater than last year and is again in line with the impact as at 31 December 2022. The increase compared to 31 December 2023 is the result of the growth of the branch 23 portfolio and the absence of a compensating effect from the risk margin for outstanding balance insurance as a result of the higher cost hypothesis.

The costs scenario generates an increase in the technical provisions, with all products being impacted. The greatest effect occurs in outstanding balance insurance, the Argenta Flexx product and the branch 23 component of the Argenta Life Plan product, as these are the products with the longest terms. The impact on the market value of equity increased compared to the previous year as a result, on the one hand, of the falling yield curve, which leads to an increase in the discounted value of the expected costs, and, on the other, an increase in the cost assumptions, so that the 10% shock applied becomes greater in absolute value.

Finally, the impact of the mortality scenario on the market value of equity is increasing. Mortality risk is present in the outstanding balance insurance portfolio, as these are policies that provide cover in the event of death. A significant part of the mortality risk also stems from the branch 23 savings and investment products portfolio (Argenta Life Plan) because more future profits are lost in the event of death. As with the lapse risk, the increase compared to 31 December 2023 is the result of the growth of the portfolio and the absence of a compensating effect from the risk margin for outstanding balance insurance as a result of the higher cost hypothesis.

	31/12/2023	31/12/2024
Sensitivity		
Lapse	-107,069,029	-149,134,258
Expenses	-53,216,209	-98,389,922
Mortality	-11,445,977	-29,668,980



For the hospitalisation insurance portfolio, the following scenarios are examined with regard to the three main risks:

- Lapse: 40% reduction in the number of policies for natural persons;
- Expenses: 10% relative increase in administration costs together with an 1% absolute increase in cost inflation;
- Mortality risk: 15% relative increase in mortality probabilities.

For the hospitalisation portfolio too, the lapse scenario shows the greatest impact on the market value of equity according to Solvency II principles. This is driven by the profitability of the portfolio, as a result of which the lapse of contracts reduces future profits. The shock for the lapse risk is greater than the previous year due to the higher future profits as a result of the higher than expected premium indexation that was applied based on the medical index and a lower cost hypothesis.

An increase in administration costs again implies a decrease in future profits. The impact of the shock on the costs is lower than last year because of a reduction in the cost assumptions.

The mortality scenario generates a slightly lower impact on the market value of equity in comparison to the other scenarios. The profitability of the portfolio decreases due to an increase in mortality probabilities. Given that future profits have increased compared to 31 December 2023, the mortality risk also increases.

	31/12/2023	31/12/2024
Sensitivity		
Lapse	-28,691,426	-41,171,391
Expenses	-15,148,655	-12,540,467
Mortality	-3,947,749	-5,653,115

For the non-life portfolio, we consider the following scenarios with regard to the two main risks:

- Premium and reserve risk: each branch uses the 1 in 200 scenario, calibrated according to the principles of the Solvency II standard model;
- Catastrophe risk: a combination of different catastrophe risks is applied depending on the nature of the non-life insurance, also calibrated according to the principles of the Solvency II standard model. This includes natural disasters (flood, hail, earthquake, storm) and human effects (motor, fire, liability).

The catastrophe risk has a greater impact on the market value of equity according to Solvency II principles than the premium and reserve risk.

With catastrophe risk, the impact of catastrophe claims is greatest on the fire insurance portfolio. The storm, flood and hail scenarios in particular contribute to the impact. Reinsurance plays an important role in all catastrophe scenarios. The increase in catastrophe risk compared to the previous year, due to the growth of the portfolio and the indexation of the insured values, is partly mitigated by the new reinsurance contract.

The premium and reserve risk has increased compared to the previous year due to the growth of the portfolio.

	31/12/2023	31/12/2024
Sensitivity		
Premium and reserve	-37,301,216	-41,531,968
Catastrophe	-70,353,819	-71,409,213



4.2. Non-financial risks

Exposure

Non-financial risks are the risk of losses/gains as a result of inadequate or failed internal processes (such as processes that are not aligned with legal requirements), human actions (including fraud and employee errors) or systems (such as system failure), or through external events (such as disasters, cyber-criminality or malfunctions of external systems, including those of the Company's suppliers or counterparties).

Because of the growing importance of operational and compliance risks, this definition has been expanded in meaning within Argenta and covers several non-financial risks that have all been itemised in the risk mapping.

Within the risk mapping, which is updated annually, the non-financial risks are defined as compliance risk, IT risk, legal & regulatory risk, resilience risk (formerly business continuity risk), sourcing risk, cyber & information security risk, process risk, human resources risk, brand & sustainability risk, strategic & change risk, data management risk and fraud risk.

All businesses carrying out activities of any kind have to cope with operational risk and/or, as defined above, non-financial risks. This is because the Company's activities depend on its ability to process a large number of transactions efficiently, accurately and in compliance with its policies/standards and with laws and regulations.

Risk management

The importance of (and the focus on) non-financial risks has increased significantly in recent years with, among other things, increased digitisation, the increased speed of change, and additional laws and regulations. This translates, among other things, into a potential increase in the effective financial losses as a result of these risks, as well as loss of efficiency, an increased potential risk of reputation loss, more complex processes and increased pressure from regulators. A thorough approach to the non-financial risks within the Company is and remains therefore essential.

The organisation for managing non-financial risks is set up so that from our second line role, we can show Group-wide and risk-based compliance with risk appetite, and additionally "create value" in order to contribute responsibly to increased security, so that the Company and its customers/staff are more resilient. In this way non-financial risk management contributes to the Company's objective of sustainable growth (history of customer experience, cost and risk management).

The risk management roles and responsibilities are specified in the Integrated Risk Management policy with the structure of the 3 lines of defence and were set out in more detail in the non-financial risk management (NFRM) policy as regards the non-financial risks.

The group risk management function with a focus on non-financial risks is performed by the Non-Financial Risk Management & Supervisory Office department (NFRM & SO).

The NFRM policy is inspired by the reference framework of ISO 31000, in which "Principles for the Sound Management and Supervision of Operational Risk" (BCBS195 – June 2011) and the "Revisions to the Principles for the Sound Management of Operational Risk" (BCBS515 – 31 March 2021) remain the reference point. Risk management is the responsibility of the whole organisation, with specific roles and responsibilities for the various departments. The Risk Management Function Charter, the Integrated Risk Management policy and the framework of the "3 Lines of Defence" (laid down in the Governance Memorandum) form the framework for clear allocation of risk management responsibilities.

The NFRM & SO department includes the independent risk management in the second line for the non-financial risks, except for the compliance risk (compliance risk is considered one of the non-financial risk types in the risk mapping = Compliance department).



In early 2025, a change in the organisational structure of management was implemented. It was designed to meet the need for efficiency, proper focus and clarity of roles/functions. This change means NFRM & SO will focus on three focal areas:

- An organisation based on the assurance life cycle, with increased efficiency by combining investigations and advice together, and with the proper focus as a result of concentrating on key risks and key controls.
- A clear distinction between effective risk management and support activities.

The transfer of activities and expertise related to 1st line inspections at the branches to Office Management. This efficiency boost from hiving off the 1st line inspections at branches will be accompanied by the transfer of tasks and associated FTEs and competences.

Within the overall risk appetite framework, the non-financial risks are managed in a structured way. The qualitative risk appetite statements (RAS) are translated into quantitative risk profiles (RAF limits, flashing lights and indicators) to adequately monitor the non-financial risks at company level.

A clear and well-functioning Risk Appetite Framework (RAF) exists in the Company and is embedded as an active steering tool in the organisation. The RAF is the subject of quarterly reporting at the Risk Committees, with feedback to the Boards.

The group entities are not only integrated into the specific reporting of the risk profiles in the RAF dashboard, but are also consolidated into global Group reporting. The annual proactive RAF exercise with the Risk Committee in preparation of the business plan also incorporates the non-financial risks. In this way, the final risk check on the business plan covers the financial and non-financial risks.



At least once a year each department formally evaluates its dynamic risk management. The qualitative maturity score is obtained by completing a standardised questionnaire. The questions relate to different components, more specifically the risk management of their own processes/management, business continuity management, the risk management of the outsourced services, data management, the personal data processing register, the incident management & loss data, the compliance with the risk appetite (monitoring control measures, monitoring risk profiles), the organisation of risk management, the reporting and analyses of the risk exposure, the monitoring of the risk profiles, the knowledge of market trends, legislation and regulations, and in conclusion also risk awareness.

Argenta, as an integrated bank-insurer, chooses to assess its banking and insurance activities jointly in the area of governance and internal control. To this end, it produces a single report, the Internal Control Annual Report. Approval of the assessment of the internal control system by the Executive Committee serves as the statement by senior management regarding the effectiveness of the governance system.

The second-line independent control is carried out through various types of assurance assignments (monitoring, domain investigations and special investigations). The special investigations can also take place within the bank branch offices. The main results are discussed in the GRC-NFR (Group Risk Committee – non-financial risks), the recommendations are recorded and tracked using Pentana (a specialized software tool).

In addition, every year a scenario analysis is made, in which the Executive Committee members define company-wide crisis scenarios that may have a significant impact on Argenta. These scenarios are used for the calculation of capital under ICAAP.

The reporting includes both quantitative reporting (RAF reporting of non-financial risks) and qualitative reporting (activities report, internal control annual report, action plan, etc.).

Finally, the management of the corporate insurance program is entrusted to the Legal Affairs department. With the assistance of an insurance broker, appropriate coverage for non-financial risks is arranged.

The high priority NFR risks ("hot spot risks") will be the focus for the following year and are defined annually. The high priorities for the non-financial risks in 2024 were data management, information security & cyber, sourcing, strategic & change and brand & sustainability (reporting).

This ensures that the right priorities are given to the identified risks, with the aim of an improved internal control system and a stronger internal control environment.

5. Related party transactions

As part of its business, the Company regularly undertakes business transactions with related parties. These transactions relate mainly to loans, deposits and insurance.

The tables below provide an overview of the activities undertaken with the related parties. The relationships between the parent and its subsidiaries are described in section 5.1 of the integrated annual report.

Balance sheet and off-balance sheet 31/12/2023	Parent company	Key management personnel	Joint ventures	Associates	Other related parties
Financial assets at fair value through other comprehensive income	0	0	0	0	0
Financial assets at amortised cost	0	22,352	0	11,247,613	854,662
Other assets	2,606,045	0	0	0	0
Total assets	2,606,045	22,352	0	11,247,613	854,662
Financial liabilities at amortised cost	43,628,280	546,283	1,713,984	0	14,385,806
Liabilities under insurance and reinsurance contracts	0	605,252	0	0	221,878
Other liabilities	117,394	0	0	0	10,112
Total liabilities	43,745,675	1,151,535	1,713,984	0	14,617,796
Loan commitments	0	37,500	0	0	307,500
Total off-balance sheet	0	37,500	0	0	307,500

Balance sheet and off-balance sheet 31/12/2024	Parent company	Key management personnel	Joint ventures	Associates	Other related parties
Financial assets at fair value through other comprehensive income	0	0	0	0	0
Financial assets at amortised cost	0	19,969	0	9,845,268	1,075,744
Other assets	2,356,984	0	0	0	0
Total assets	2,356,984	19,969	0	9,845,268	1,075,744
Financial liabilities at amortised cost	35,778,918	593,822	1,296,244	0	11,808,405
Liabilities under insurance and reinsurance contracts	0	663,892	0	0	270,657
Other liabilities	180,389	0	0	0	28,104
Total liabilities	35,959,306	1,257,714	1,296,244	0	12,107,166
Loan commitments	0	20,000	0	0	218,750
Total off-balance sheet	0	20,000	0	0	218,750

As explained, the majority shareholder (direct/ultimate parent) of the Company is Investeringsmaatschappij Argenta (Investar). The "Parent company" column contains the data of Investar.

The "Key management personnel" column contains the information of the executive and non-executive directors (see 5.2.5 of the integrated annual report). The "close relatives" of the directors comprise the spouses, partners who are regarded as equivalent to a spouse under their national law and first-degree blood relatives. They are included under "Other related parties".



The column “Other related parties” contains the transactions with the other companies that are members of the Argenta Group (in particular Vestar).

The financial liabilities at amortised cost towards the parent company consist of the lease liabilities for the business buildings, as well as current and savings balances held by the parent companies with the Company. The balance on current, savings and term accounts held by the parent company decreased in 2024. The financial liabilities towards other group companies also consist of lease liabilities and current and savings balances held with the Company by Vestar, which also declined in 2024. The financial liabilities at amortised cost towards joint ventures represent the lease liabilities to Jofico for the Company’s ATMs. The associates item relates to Epico.

Statement of profit or loss 31/12/2023	Parent company	Key management personnel	Joint ventures	Associates	Other related parties
Interest expenses	1,390,555	1,359	10,963	0	47,354
General and administrative expenses	2,163,677	0	1,021,916	0	277,445
Total expenses	3,554,232	1,359	1,032,880	0	324,800
Interest income	0	510	0	738,032	14,293
Fee and commission income	0	187	0	0	1,017
Other operating income	121,308	0	0	0	0
Net income from insurance and reinsurance contracts	0	7,021	0	0	86,903
Total income	121,308	7,719	0	738,032	102,212

Statement of profit or loss 31/12/2024	Parent company	Key management personnel	Joint ventures	Associates	Other related parties
Interest expenses	350,952	12,354	9,236	0	102,847
General and administrative expenses	2,122,371	0	1,067,743	0	202,154
Total expenses	2,473,323	12,354	1,076,979	0	305,000
Interest income	0	432	0	864,381	20,972
Fee and commission income	0	209	0	0	619
Other operating income	124,132	0	19,127	0	0
Net income from insurance and reinsurance contracts	0	58,037	0	0	63,919
Total income	124,132	58,678	19,127	864,381	85,510

Impairments of EUR 3,700 were reversed in 2024 on balance sheet items involving associates.



Note on credit transfers from Aspa to Aras

Since 2013, credit transfers have taken place between Aspa and Aras. For this, a general framework agreement and a RACI (Responsible – Accountable – Consulted – Informed) have been established. Based on the RACI, the transfers are coordinated and all relevant parties are systematically involved so that transactions take place at arm's length. The credit transfers randomly selected from recent new production of (according to Aras's risk appetite) eligible loans. After selection, they are immediately transferred.

In this way, Aspa grants Dutch loans through the NL branch which are then taken over definitively by Aras. Loans totalling EUR 55,584,213 were transferred in 2023. In 2024 EUR 85,119,726 in loans were transferred. These loans are not included in the tables above.

Note on compensation – executive directors

The remuneration of the executive directors has already been described in section 5.2.5 of the integrated annual report.



6. Operating segments and 'country by country' reporting

Operating segments

An operating segment is a component of the Company that performs business activities that may generate income or expenses. The operating results of the segment are regularly reviewed by management to make decisions about resource allocation and to assess its performance. Additionally, separate financial information is available for the segment.

Section 5.1 of the integrated annual report explains the Company's structure. The operating segments follow from the business activities (products and services) and the geographical areas in which the Company operates.

The geographic areas where the Company operates are reflected in the organisational structure through the presence of Aspa and Aras in Belgium, a branch office in the Netherlands, and a subsidiary, AAM, in Luxembourg. Consequently, the following segments are distinguished:

- Activities in Belgium;
- Activities in the Netherlands;
- Activities in Luxembourg.

The business activities reflect the activities and services offered by the Company. The Company's activities are divided into 2 pillars, the Bank Pool and the Insurance Pool. These are treated as separate operating segments in the internal reporting. The ultimate chief operating decision maker (CODM) is the Executive Committee of the Company.

Information on products and services



The Bank Pool falls fully under the segment of retail banking. The Insurance pool falls under the segment of retail insurance. In the tables below, BVg's contribution to the statutory balance sheet and results is also included in the Bank Pool.

Retail banking offers financial services to private individuals as well as to self-employed persons and, to a very limited extent, to small and medium-sized companies. In the Benelux, it provides advice on daily banking, savings, lending and investment.

Retail insurance offers insurance services to individuals and, to a very limited extent, self-employed professionals in the Life and Non-Life branches.

Assets	Bank Pool	Insurance Pool	31/12/2023
Cash and cash equivalents	62,600,333	0	62,600,333
Cash balances at central banks and other demand deposits	2,152,396,828	1,126,335	2,153,523,163
Financial assets held for trading	63,051,701	0	63,051,701
Financial assets related to unit-linked insurance contracts (branch 23)	0	2,995,790,474	2,995,790,474
Non-trading financial assets mandatorily at fair value through profit or loss	33,615,223	72,614,701	106,229,924
Financial assets at fair value through other comprehensive income	3,022,408,802	1,883,788,850	4,906,197,653
Financial assets at amortised cost	48,031,800,405	1,227,435,843	49,259,236,248
Derivatives used for hedging	1,425,057,322	0	1,425,057,322
Fair value changes of the hedged items in portfolio hedge of interest rate risk	-1,245,442,292	0	-1,245,442,292

Assets	Bank Pool	Insurance Pool	31/12/2023
Assets under insurance contracts	0	0	0
Assets under reinsurance contracts	0	27,259,304	27,259,304
Investments in joint ventures and associates	1,847,865	2,676,000	4,523,865
Tangible assets	63,698,690	634,453	64,333,143
Intangible assets	23,126,581	262,676	23,389,257
Goodwill	98,150,460	0	98,150,460
Tax assets	99,811,532	2,146,399	101,957,932
Other assets	272,138,250	5,301,265	277,439,515
Total assets	54,104,261,701	6,219,036,300	60,323,298,001

Assets	Bank Pool	Insurance Pool	31/12/2024
Cash and cash equivalents	66,244,880	0	66,244,880
Cash balances at central banks and other demand deposits	2,389,807,691	521,378	2,390,329,068
Financial assets held for trading	28,431,717	0	28,431,717
Financial assets related to unit-linked insurance contracts (branch 23)	0	3,218,139,911	3,218,139,911
Non-trading financial assets mandatorily at fair value through profit or loss	35,334,486	72,495,402	107,829,888
Financial assets at fair value through other comprehensive income	2,510,148,027	2,006,739,246	4,516,887,273
Financial assets at amortised cost	50,284,546,565	1,241,877,018	51,526,423,582
Derivatives used for hedging	1,175,707,254	0	1,175,707,254
Fair value changes of the hedged items in portfolio hedge of interest rate risk	-937,134,618	0	-937,134,618
Assets under insurance contracts	0	3,037,654	3,037,654
Assets under reinsurance contracts	0	27,260,527	27,260,527
Investments in joint ventures and associates	1,892,697	2,732,628	4,625,325
Tangible assets	67,662,994	682,825	68,345,819
Intangible assets	19,887,034	198,971	20,086,005
Goodwill	98,150,460	0	98,150,460
Tax assets	103,823,169	3,751,356	107,574,525
Other assets	247,655,203	4,548,841	252,204,043
Total assets	56,092,157,558	6,581,985,757	62,674,143,315



Liabilities	Bank Pool	Insurance Pool	31/12/2023
Financial liabilities held for trading	52,642,345	0	52,642,345
Financial liabilities related to unit-linked insurance contracts (branch 23)	0	2,995,790,474	2,995,790,474
Financial liabilities at amortised cost	50,355,916,885	9,065,285	50,364,982,170
Derivatives used for hedging	242,563,369	0	242,563,369
Fair value changes of the hedged items in portfolio hedge of interest rate risk	0	0	0
Liabilities under insurance contracts	0	2,683,342,397	2,683,342,397
Liabilities under reinsurance contracts	0	15,637,315	15,637,315
Provisions	12,151,897	479,318	12,631,215
Tax liabilities	21,383,375	28,374,404	49,757,779
Other liabilities	187,222,733	60,540,147	247,762,880
Total liabilities	50,871,880,604	5,793,229,340	56,665,109,944

Liabilities	Bank Pool	Insurance Pool	31/12/2024
Financial liabilities held for trading	22,912,955	0	22,912,955
Financial liabilities related to unit-linked insurance contracts (branch 23)	0	3,218,139,911	3,218,139,911
Financial liabilities at amortised cost	52,087,539,994	9,058,460	52,096,598,454
Derivatives used for hedging	316,370,716	0	316,370,716
Fair value changes of the hedged items in portfolio hedge of interest rate risk	0	0	0
Liabilities under insurance contracts	0	2,824,567,144	2,824,567,144
Liabilities under reinsurance contracts	0	17,387,420	17,387,420
Provisions	13,997,910	579,851	14,577,761
Tax liabilities	25,556,565	14,542,002	40,098,567
Other liabilities	175,734,739	49,731,775	225,466,514
Total liabilities	52,642,112,880	6,134,006,563	58,776,119,443

Statement of profit or loss	Bank Pool	Insurance Pool	Conso	31/12/2023
Net interest income	741,800,354	82,132,214	0	823,932,569
Dividend income	438,841	7,810,638	0	8,249,479
Net fee and commission income	51,338,579	37,418,790	-964,810	87,792,559
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	-863,920	563,302	0	-300,617
Gains or losses on financial assets and liabilities held for trading	-5,626,767	0	0	-5,626,767
Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss	845,992	4,224,358	0	5,070,350
Gains or losses from hedge accounting	-5,634,523	0	0	-5,634,523
Gains or losses on the derecognition of non-financial assets	-363,084	0	0	-363,084
Insurance service result	0	25,286,358	-2,933	25,283,426



Statement of profit or loss	Bank Pool	Insurance Pool	Conso	31/12/2023
Reinsurance service result	0	-1,321,353	0	-1,321,353
Insurance finance result	0	-24,639,413	0	-24,639,413
Net other operating income	67,486,313	-21,349,176	-30,618,149	15,518,988
Administrative expenses	-473,315,543	-14,746,908	31,585,892	-456,476,560
Depreciation and amortisation	-24,521,781	-594,790	0	-25,116,570
Modification gains or (-) losses	0	0	0	0
Provisions or reversal of provisions	-91,581	0	0	-91,581
Impairments or reversal of impairments	-12,770,379	-3,252,705	0	-16,023,084
Share in results of associates and joint ventures	19,925	15,094	0	35,019
Profit or loss before tax	338,742,427	91,546,410	0	430,288,837
Tax expense	-97,488,199	-22,771,515	0	-120,259,714
Profit or loss after tax	241,254,228	68,774,896	0	310,029,123

Statement of profit or loss	Bank Pool	Insurance Pool	Conso	31/12/2024
Net interest income	688,459,148	88,995,958	0	777,455,106
Dividend income	408,477	7,621,438	0	8,029,915
Net fee and commission income	75,969,224	41,914,474	634,047	118,517,745
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	5,164,500	-2,068,193	0	3,096,306
Gains or losses on financial assets and liabilities held for trading	-2,121,663	0	0	-2,121,663
Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss	1,968,071	5,932,592	0	7,900,663
Gains or losses from hedge accounting	-1,669,073	0	0	-1,669,073
Gains or losses on the derecognition of non-financial assets	-10,920	0	0	-10,920
Insurance service result	0	29,797,348	-2,822	29,794,525
Reinsurance service result	0	-7,133,134	0	-7,133,134
Insurance finance result	0	-30,376,536	0	-30,376,536
Net other operating income	91,758,141	-46,187,683	-31,003,459	14,567,000
Administrative expenses	-456,375,155	-15,892,224	30,372,233	-441,895,146
Depreciation and amortisation	-24,239,950	-295,366	0	-24,535,316
Modification gains or (-) losses	0	0	0	0
Provisions or reversal of provisions	-535,273	0	0	-535,273
Impairments or reversal of impairments	1,807,896	-381,929	0	1,425,967
Share in results of associates and joint ventures	44,832	56,628	0	101,460
Profit or loss before tax	380,628,253	71,983,372	0	452,611,626
Tax expense	-107,578,632	-17,927,924	0	-125,506,557
Profit or loss after tax	273,049,621	54,055,448	0	327,105,069



Information on geographic regions

The operational segmentation based on geographic regions reflects the Company's focus on the Benelux countries. The geographic segmentation given below is specifically based on the location of the services provided, and offers the breakdown by geographic region.

Assets	Belgium	The Netherlands	Luxembourg	31/12/2023
Cash and cash equivalents	62,600,333	0	0	62,600,333
Cash balances at central banks and other demand deposits	1,930,414,828	220,331,011	2,777,324	2,153,523,163
Financial assets held for trading	10,261,279	52,790,422	0	63,051,701
Financial assets related to unit-linked insurance contracts (branch 23)	2,995,790,474	0	0	2,995,790,474
Non-trading financial assets mandatorily at fair value through profit or loss	106,229,924	0	0	106,229,924
Financial assets at fair value through other comprehensive income	4,906,197,653	0	0	4,906,197,653
Financial assets at amortised cost	27,671,081,234	21,586,098,892	2,056,122	49,259,236,248
Derivatives used for hedging	1,419,969,542	5,087,780	0	1,425,057,322
Fair value changes of the hedged items in portfolio hedge of interest rate risk	-1,238,299,395	-7,142,897	0	-1,245,442,292
Assets under insurance contracts	0	0	0	0
Assets under reinsurance contracts	27,259,304	0	0	27,259,304
Investments in joint ventures and associates	4,523,865	0	0	4,523,865
Tangible assets	63,384,291	948,852	0	64,333,143
Intangible assets	23,376,460	0	12,797	23,389,257
Goodwill	98,150,460	0	0	98,150,460
Tax assets	39,814,640	62,143,292	0	101,957,932
Other assets	135,488,402	128,140,700	13,810,413	277,439,515
Total assets	38,256,243,295	22,048,398,051	18,656,655	60,323,298,001



Assets	Belgium	The Netherlands	Luxembourg	31/12/2024
Cash and cash equivalents	66,244,880	0	0	66,244,880
Cash balances at central banks and other demand deposits	2,223,644,306	164,396,698	2,288,064	2,390,329,068
Financial assets held for trading	5,490,663	22,941,054	0	28,431,717
Financial assets related to unit-linked insurance contracts (branch 23)	3,218,139,911	0	0	3,218,139,911
Non-trading financial assets mandatorily at fair value through profit or loss	107,829,888	0	0	107,829,888
Financial assets at fair value through other comprehensive income	4,516,887,273	0	0	4,516,887,273
Financial assets at amortised cost	28,464,819,716	23,059,479,081	2,124,785	51,526,423,582
Derivatives used for hedging	1,175,707,254	0	0	1,175,707,254
Fair value changes of the hedged items in portfolio hedge of interest rate risk	-937,134,618	0	0	-937,134,618
Assets under insurance contracts	3,037,654	0	0	3,037,654
Assets under reinsurance contracts	27,260,527	0	0	27,260,527
Investments in joint ventures and associates	4,625,325	0	0	4,625,325
Tangible assets	67,858,101	487,718	0	68,345,819
Intangible assets	20,086,005	0	0	20,086,005
Goodwill	98,150,460	0	0	98,150,460
Tax assets	18,392,528	89,181,996	0	107,574,525
Other assets	138,914,802	96,696,921	16,592,320	252,204,043
Total assets	39,219,954,678	23,433,183,469	21,005,169	62,674,143,315

Liabilities	Belgium	The Netherlands	Luxembourg	31/12/2023
Financial liabilities held for trading	0	52,642,345	0	52,642,345
Financial liabilities related to unit-linked insurance contracts (branch 23)	2,995,790,474	0	0	2,995,790,474
Financial liabilities at amortised cost	45,450,533,123	4,914,449,047	0	50,364,982,170
Derivatives used for hedging	242,563,369	0	0	242,563,369
Fair value changes of the hedged items in portfolio hedge of interest rate risk	0	0	0	0
Liabilities under insurance contracts	2,683,342,397	0	0	2,683,342,397
Liabilities under reinsurance contracts	15,637,315	0	0	15,637,315
Provisions	11,228,371	1,402,843	0	12,631,215
Tax liabilities	29,725,530	17,193,955	2,838,294	49,757,779
Other liabilities	217,327,623	29,649,272	785,986	247,762,880
Total liabilities	51,646,148,203	5,015,337,461	3,624,280	56,665,109,944



Liabilities	Belgium	The Netherlands	Luxembourg	31/12/2024
Financial liabilities held for trading	0	22,912,955	0	22,912,955
Financial liabilities related to unit-linked insurance contracts (branch 23)	3,218,139,911	0	0	3,218,139,911
Financial liabilities at amortised cost	47,207,258,902	4,889,339,552	0	52,096,598,454
Derivatives used for hedging	316,370,716	0	0	316,370,716
Fair value changes of the hedged items in portfolio hedge of interest rate risk	0	0	0	0
Liabilities under insurance contracts	2,824,567,144	0	0	2,824,567,144
Liabilities under reinsurance contracts	17,387,420	0	0	17,387,420
Provisions	13,647,053	930,708	0	14,577,761
Tax liabilities	17,252,295	16,212,122	6,634,150	40,098,567
Other liabilities	197,313,062	27,642,676	510,776	225,466,514
Total liabilities	53,811,936,503	4,957,038,014	7,144,926	58,776,119,443

Statement of profit or loss	Belgium	The Netherlands	Luxembourg	Conso	31/12/2023
Net interest income	584,079,372	239,790,821	62,375	0	823,932,569
Dividend income	8,249,479	0	0	0	8,249,479
Net fee and commission income	16,065,538	2,247,589	70,444,242	-964,810	87,792,559
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	546,720	-847,338	0	0	-300,617
Gains or losses on financial assets and liabilities held for trading	-5,637,823	11,056	0	0	-5,626,767
Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss	5,070,350	0	0	0	5,070,350
Gains or losses from hedge accounting	-5,615,140	-19,383	0	0	-5,634,523
Gains or losses on the derecognition of non-financial assets	-363,084	0	0	0	-363,084
Insurance service result	25,286,358	0	0	-2,933	25,283,426
Reinsurance service result	-1,321,353	0	0	0	-1,321,353
Insurance finance result	-24,639,413	0	0	0	-24,639,413
Net other operating income	124,349,875	-78,113,638	-99,100	-30,618,149	15,518,988
Administrative expenses	-434,055,251	-48,689,111	-5,318,090	31,585,892	-456,476,560
Depreciation and amortisation	-24,738,015	-376,717	-1,839	0	-25,116,570
Modification gains or (-) losses	0	0	0	0	0
Provisions or reversal of provisions	-240,349	148,768	0	0	-91,581
Impairments or reversal of impairments	-17,281,202	1,258,118	0	0	-16,023,084
Share in results of associates and joint ventures	35,019	0	0	0	35,019
Profit or loss before tax	249,791,084	115,410,165	65,087,588	0	430,288,837
Tax expense	-72,969,825	-31,058,232	-16,231,657	0	-120,259,714
Profit or loss after tax	176,821,259	84,351,933	48,855,931	0	310,029,123



Statement of profit or loss	Belgium	The Netherlands	Luxembourg	Conso	31/12/2024
Net interest income	603,142,516	174,228,774	83,817	0	777,455,106
Dividend income	8,029,915	0	0	0	8,029,915
Net fee and commission income	34,078,384	2,041,019	81,764,294	634,047	118,517,745
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	1,008,194	2,088,113	0	0	3,096,306
Gains or losses on financial assets and liabilities held for trading	-2,001,685	-119,978	0	0	-2,121,663
Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss	7,900,663	0	0	0	7,900,663
Gains or losses from hedge accounting	-1,695,498	26,425	0	0	-1,669,073
Gains or losses on the derecognition of non-financial assets	-10,920	0	0	0	-10,920
Insurance service result	29,797,348	0	0	-2,822	29,794,525
Reinsurance service result	-7,133,134	0	0	0	-7,133,134
Insurance finance result	-30,376,536	0	0	0	-30,376,536
Net other operating income	91,284,728	-45,598,300	-115,970	-31,003,459	14,567,000
Administrative expenses	-419,683,279	-46,897,366	-5,686,734	30,372,233	-441,895,146
Depreciation and amortisation	-24,087,735	-434,785	-12,797	0	-24,535,316
Modification gains or (-) losses	0	0	0	0	0
Provisions or reversal of provisions	-1,185,626	650,353	0	0	-535,273
Impairments or reversal of impairments	-441,688	1,867,655	0	0	1,425,967
Share in results of associates and joint ventures	101,460	0	0	0	101,460
Profit or loss before tax	288,727,105	87,851,910	76,032,611	0	452,611,626
Tax expense	-80,099,730	-26,445,475	-18,961,352	0	-125,506,557
Profit or loss after tax	208,627,375	61,406,436	57,071,259	0	327,105,069

The main transactions between the operating segments consists of:

- The distribution of profits between the Company's head office (located in Belgium) and the branch office (in the Netherlands). More information is included below.
- The retrocession of a portion of the management fees from asset management activities performed in Luxembourg to the Aspa and Aras as consideration for the distribution of these investment products.

The result in the Netherlands is realised by the Company's branch office. The Company's head office finances the branch office and carries out a number of activities (mainly of a general strategy and risk management nature) for the branch office. The Company applies an allocation mechanism (for which a ruling application has been submitted pending final approval by the tax authorities) for the determination of the allocation of the results to the branch. This mechanism consists of:

- An interest payment for the financing provided, whereby a part of the total interest expenses of the head office is allocated (on the basis of the financing provided) to the branch (fungibility approach). This payment is recorded under "Net interest income".



- A fee for the responsibilities performed by the Company's head office for the value chain and for key entrepreneurial risk-taking functions. This fee is recorded under "Net other operating expenses".

On 31 December 2019, the previous ruling agreement ended and a new application was submitted for a period of 5 years. The mechanism as in the submitted application, which had not yet been approved at the date of this report, has been applied in preparing the balance sheet and results up to 31 December 2023. At the end of 2024, the Company was verbally informed by the relevant tax authorities that an agreement regarding the ruling application had been verbally agreed.

This agreement included a change in the interest payment compared to the original application (adding several elements to the basis for determining funding costs) and an adjustment in the fee for responsibilities performed by the Company's head office for the value chain and key entrepreneurial risk-taking functions. Both changes have already been recognised for financial year 2024.

The change in the interest payment (by adding several elements to the basis for determining funding costs) has created uncertainty about the tax treatment of a part of these interest expenses in the branch, with a potential estimated negative impact of EUR 16.5 million. The Company disputes this tax treatment and assesses its chances positively (more likely than not) and consequently, has not recognised a provision.

The increase in the net interest result in Belgium is mainly the result of the positive development of the interest income on the loan and investment portfolios, derivatives and the funding provided to the branch, partially offset by the extra financing costs due to the increased interest rate. The decrease of the net interest income in the Netherlands is the result of the increased interest expenses on the securitisation issues (Euribor 3 months) and the interest expenses on the funding provided by head office.



The net other operating income includes, as explained above, the fee charged between head office and its branch for the non-interest component of the profit allocation, recoveries of administrative costs (file costs) from customers, and of rental costs and IT infrastructure cost from agents. The fee charged between the head office and the branch for the non-interest component of the profit allocation decreased in 2024 due to the decrease in the result of the branch and the adjustment following the verbal agreement between the relevant tax authorities.

Information about major customers

If the income from transactions with a single external customer accounts for at least 10% of the Company's income, it must be disclosed.

Under the various policies and standards that the Company currently applies to limit the concentration of credit risk (and implicitly the concentration of income), the 10% threshold will never be reached.

Country-by-country reporting

Under Article 420 of the Act of 25 April 2014 on the status and supervision of credit institutions (known as the "Banking Act") and pursuant to Article 89 of the Capital Requirements Directive IV of the European Union, the Company is required to disclose the information specified below on a consolidated basis, broken down by EU Member State or third country in which it is established (through a branch and/or subsidiary).

Countries	Activities	31/12/2023						
		Returns	Profit before taxes	Current taxes	Deferred taxes	Total corporate tax	Subsidies received	Average number of employees (FTEs)
EU Member State		927,961,613	430,288,837	-102,868,831	-16,548,691	-120,259,714	0	1,104
Belgium	Bank and insurance	694,484,989	249,791,084	-54,347,339	-17,780,294	-72,969,825	0	1,020
The Netherlands	Bank	163,069,107	115,410,165	-32,289,835	1,231,603	-31,058,232	0	71
Luxembourg	Other financial services	70,407,517	65,087,588	-16,231,657	0	-16,231,657	0	13
Third country		0	0	0	0	0	0	0
Total		927,961,613	430,288,837	-102,868,831	-16,548,691	-120,259,714	0	1,104

Countries	Activities	31/12/2024						
		Returns	Profit before taxes	Current taxes	Deferred taxes	Total corporate tax	Subsidies received	Average number of employees (FTEs)
EU Member State		918,049,933	452,611,626	-115,664,583	-9,841,973	-125,506,557	0	1,250
Belgium	Bank and insurance	703,651,739	288,727,105	-69,422,624	-10,677,106	-80,099,730	0	1,151
The Netherlands	Bank	132,666,052	87,851,910	-27,280,608	835,133	-26,445,475	0	78
Luxembourg	Other financial services	81,732,141	76,032,611	-18,961,352	0	-18,961,352	0	21
Third country		0	0	0	0	0	0	0
Total		918,049,933	452,611,626	-115,664,583	-9,841,973	-125,506,557	0	1,250

Notes to the consolidated balance sheet

7. Cash and cash balances at central banks and other demand deposits

Cash and cash balances at central banks, and other demand deposits include all cash and current account balances at central banks and other financial institutions.

	31/12/2023	31/12/2024
Cash	62,600,333	66,244,880
Cash balances at central banks	1,950,858,245	2,246,823,228
Cash balances at other financial institutions	202,664,918	143,505,840
Total	2,216,123,495	2,456,573,949

On 31 December 2024, there were EUR 2,246,823,228 in the current accounts at the central bank. A part of this amount consists of the monetary reserves that every financial institution is required to hold with the central banks, but the majority relates to the deposit account at the ECB, in particular EUR 1,825,288,032 at the Belgian National Bank and EUR 28,640,250 at the Dutch Central Bank.



8. Financial assets and liabilities held for trading

The financial assets and liabilities held for trading are composed as follows:

Financial assets	Number	Notional	31/12/2023		Number	Notional	31/12/2024
			Carrying amount				Carrying amount
Interest rate options – caps	3	650,000,000	10,261,279	2	350,000,000		5,490,663
Securitisation transactions – caps	4	2,857,860,129	52,790,422	3	1,895,534,695		22,941,054
Total			63,051,701				28,431,717

Financial liabilities	Number	Notional	31/12/2023		Number	Notional	31/12/2024
			Carrying amount				Carrying amount
Interest rate options – caps	0	0	0	0	0		0
Securitisation transactions – caps	4	2,857,860,129	52,642,345	3	1,895,534,695		22,912,955
Total			52,642,345				22,912,955

Unlisted (OTC) – interest-rate options – caps

Financial assets held for trading include the interest rate options (caps), as they have a positive fair value. Financial liabilities include interest rate options (caps) with a negative fair value.

These interest rate options, purchased over-the-counter (OTC) from other financial institutions, are entered into in the framework of economic hedges within the ALM policy, but were not documented for the application of hedge accounting.

The options serve as protection against the interest rate risk. They are commitments by the seller to pay the buyer an interest rate difference in exchange for a premium paid by the buyer.

During the past two years no additional caps have been concluded in the context of the Company's interest rate risk management.

Unlisted (OTC) – swaps (securitisation transactions)

The caps that are concluded in the context of a securitisation transaction and are not accounted for in accordance with hedge accounting principles fall under this heading.

In past years, new securitisation transactions were carried out, with two caps for each transaction.

The limited difference between the market value of the caps on the asset side and the liability side of the balance sheet is recognised in the statement of profit or loss.



9. Assets and liabilities related to unit-linked insurance contracts (branch 23)

Financial assets and liabilities relating to unit-linked insurance contracts relate to investments in transactions connected to an investment fund of the “Life” group activities, where the investment risk is not borne by the undertaking (so-called branch 23 investments).

	31/12/2023	31/12/2024
Assets related to unit-linked insurance contracts (branch 23)	2,995,790,474	3,218,139,911
Liabilities related to unit-linked insurance contracts (branch 23)	2,995,790,474	3,218,139,911

The table below gives an indication of the composition of the underlying assets of the branch 23 products.

	31/12/2023	31/12/2024
Investment funds	2,981,775,873	3,217,901,456
Cash and cash equivalents	14,014,601	238,455
Composition of the assets	2,995,790,474	3,218,139,911

The assets and liabilities for branch 23 unit-linked insurance contracts rose by 7.4% as a result of the positive stock market development and net production.

10. Non-trading financial assets mandatorily at fair value through profit or loss

In the context the classification and measurement of financial instruments, the SPPI test is performed to determine whether only ordinary interest and capital repayments are made on a financial instrument.

If this is not the case, the security must be recognised at fair value through profit or loss. Also included below are the equity instruments for which Company has not applied the option to measure these at fair value through other comprehensive income. On 31 December 2024, there was EUR 107,829,888 under this classification.

	31/12/2023	31/12/2024
Total portfolio	106,229,924	107,829,888
Breakdown by instrument type		
Variable-income securities	61,344,261	60,190,717
Fixed-income securities	44,885,663	47,639,171
Loans and advances	0	0
Breakdown by interest rate type		
Variable	26,511,850	25,801,027
Fixed	18,373,813	21,838,144
Undefined	61,344,261	60,190,717
Geographical breakdown		
Belgium	31,436,575	28,925,871
European Monetary Union	74,793,349	78,904,017
Rest of the world	0	0
Breakdown by residual term or maturity		
Up to 1 year	0	0
1 to 5 years	0	0
More than 5 years	44,885,663	47,639,171
Undefined	61,344,261	60,190,717
Breakdown by counterparty		
Public and regional authorities	0	0
Credit institutions	24,660,250	24,332,641
Other financial institutions	21,384,204	25,207,824
Other institutions	60,185,470	58,289,423
Effective interest rate at 31/12	2.70%	2.70%



11. Financial assets at fair value through other comprehensive income

Financial assets at fair value through other comprehensive income included EUR 4,516,887,273 in instruments on 31 December 2024.

	31/12/2023	31/12/2024
Total portfolio	4,906,197,653	4,516,887,273
of which hedged via micro-hedges	830,239,518	568,255,270
Breakdown by instrument type		
Equity instruments	146,967,729	134,615,353
Debt securities	4,759,229,924	4,382,271,921
Breakdown by interest rate type		
Variable	787,961,020	797,420,411
Fixed	3,971,268,903	3,584,851,509
Undefined	146,967,729	134,615,353
Geographical breakdown		
Belgium	1,119,745,080	990,106,044
European Monetary Union	3,094,931,226	2,977,439,357
Rest of the world	691,521,346	549,341,872
Breakdown by residual term or maturity		
Up to 1 year	1,028,724,263	866,481,471
1 to 5 years	2,284,168,456	2,025,970,013
More than 5 years	1,446,337,205	1,489,820,436
Undefined	146,967,729	134,615,353
Breakdown by counterparty		
Public and regional authorities	1,329,172,870	1,120,535,969
Credit institutions	1,044,923,620	898,958,681
Other financial institutions	869,598,218	951,589,231
Other institutions	1,662,502,943	1,545,803,392
Breakdown by impairment stage (gross carrying amount)		
Debt securities		
Stage 1	4,719,088,262	4,337,288,239
Stage 2	40,141,662	44,983,682
Stage 3	0	0
Breakdown by impairment stage (impairment)		
Debt securities		
Stage 1	-3,997,741	-1,651,438
Stage 2	-3,863,816	-5,651,282
Stage 3	0	0
Effective interest rate at 31/12	2.08%	2.25%

In the past years, no individual (stage 3) impairments were recorded on this portfolio.



On 31 December 2023, impairments totalled EUR 3,997,741 in stage 1 and EUR 3,863,816 in stage 2. In 2024, this changed to EUR 1,651,438 and EUR 5,651,282, respectively. Further information on the changes in impairments is included in Note 36.

The securities involved are all recognised in the balance sheet as financial assets at fair value through other comprehensive income. Note 24 provides further information on the fair values used and in particular on the level hierarchy of the fair values involved.

The Company has opted to measure a part of its portfolio of equity instruments at fair value through other comprehensive income. The underlying positions consist of an infrastructure fund that the Company maintains with a long-term investment perspective (the Company also provides loans to finance the underlying infrastructure projects), equity instruments of companies with which it pursues long-term relationships, and equity instruments used as covering assets in the Insurance Pool, also with a long-term investment perspective. In 2024, positions in this portfolio were sold and EUR 63,885 in valuation gains transferred from other comprehensive income to the reserves. EUR 6,784,942 of dividends were also received. In 2023, EUR 6,014,834 in valuation gains were transferred to reserves and EUR 6,674,572 of dividends were received.

As of the end of 2024, securities were encumbered as part of the collateral management of derivative instruments and as surety for the credit cards issuer. The Company also has a credit line with the NBB, for which securities are encumbered when this credit line is used. Further information on encumbered assets can be found in Note 38.

The amortised cost and fair value adjustments in other comprehensive income of the portfolios on 31 December were as follows:

31/12/2023	Amortised cost	Accumulated fair value changes	Accumulated impairments	Fair value
Debt securities				
Public and regional authorities	1,364,608,155	-34,516,450	-918,834	1,329,172,870
Credit institutions	1,056,371,560	-10,867,880	-580,060	1,044,923,620
Other financial institutions	816,020,353	-16,292,355	-549,543	799,178,455
Other institutions	1,657,957,485	-66,209,992	-5,792,515	1,585,954,977
Equity instruments				
Shares and others	126,608,537	18,034,166		144,642,703
Investment funds and other	999,119	1,325,908		2,325,026
Total	5,022,565,208	-108,526,604	-7,840,952	4,906,197,653



31/12/2024	Amortised cost	Accumulated fair value changes	Accumulated impairments	Fair value
Debt securities				
Public and regional authorities	1,139,532,234	-18,608,090	-388,174	1,120,535,969
Credit institutions	896,769,951	2,382,227	-193,497	898,958,681
Other financial institutions	899,628,157	-7,533,097	-256,162	891,838,899
Other institutions	1,502,400,669	-25,003,824	-6,458,473	1,470,938,372
Equity instruments				
Shares and others	131,994,171	680,412		132,674,582
Investment funds and other	999,118	941,652		1,940,770
Total	4,571,324,300	-47,140,721	-7,296,306	4,516,887,273

12. Financial assets at amortised cost

A distinction is made between “loans and advances” and debt securities.



	31/12/2023	31/12/2024
Total portfolio	49,259,236,248	51,526,423,582
Breakdown by instrument type		
Loans and advances	42,141,082,681	44,184,290,857
Debt securities	7,118,153,567	7,342,132,726
Breakdown by product type		
Loans to credit institutions	2,056,122	2,124,785
Cash collateral to financial institutions	126,423,820	133,448,898
Consumer loans	427,815,655	451,152,420
Mortgage loans	40,056,309,428	42,131,676,233
Term loans	1,484,976,649	1,418,283,606
Advances and overdrafts	3,059,280	5,413,392
Leasing	40,441,728	42,191,523
Debt securities	7,118,153,567	7,342,132,726
Breakdown of debt securities by interest rate type		
Variable	308,533,343	278,905,225
Fixed	6,809,620,224	7,063,227,500
Geographical breakdown of debt securities		
Belgium	2,164,522,879	1,992,902,545
European Monetary Union	4,124,025,357	4,473,573,787
Rest of the world	829,605,331	875,656,394

	31/12/2023	31/12/2024
Breakdown by residual term by latest maturity date		
Debt securities		
Up to 1 year	1,049,048,930	1,159,037,792
1 to 5 years	5,131,555,966	5,364,218,943
More than 5 years	937,548,671	818,875,990
Loans and advances		
Up to 1 year	1,935,718,400	2,147,726,742
1 to 5 years	7,208,811,267	7,377,616,766
More than 5 years	32,996,553,015	34,658,947,348
Breakdown of debt securities by counterparty		
Public and regional authorities	1,545,430,547	1,900,525,159
Credit institutions	2,260,521,405	2,161,526,896
Other financial institutions	737,674,336	762,173,660
Other institutions	2,574,527,279	2,517,907,010
Breakdown by impairment stage (gross carrying amount)		
Debt securities		
Stage 1	7,044,086,318	7,274,181,554
Stage 2	90,248,021	87,319,188
Stage 3	0	0
Loans and advances		
Stage 1	36,991,524,502	38,956,131,554
Stage 2	5,011,961,246	5,086,048,078
Stage 3	183,182,431	181,780,845
Breakdown by impairment stage (impairment)		
Debt securities		
Stage 1	-5,645,719	-2,736,703
Stage 2	-10,535,053	-16,631,315
Stage 3	0	0
Loans and advances		
Stage 1	-6,447,994	-2,891,147
Stage 2	-12,572,923	-13,099,994
Stage 3	-26,564,581	-23,678,477
Effective interest rate debt securities as at 31/12	2.31%	2.35%
Effective interest rate loans and advances as at 31/12	2.20%	2.36%

The loans and advances have further increased through the additional lending to the Company's retail customers, both in Belgium and the Netherlands.

For loans and receivables there are, at the end of 2024, EUR 2,891,147 of stage 1 and EUR 13,099,994 of stage 2 impairments. The amount of stage 3 individual impairments had fallen to EUR 23,678,477. Further information on the changes in impairments is included in Note 36.

For debt securities, stage 1 impairments decreased to EUR 2,736,703 and stage 2 impairments rose to EUR 16,631,315. There are no individual impairments (stage 3) for this portfolio.

13. Derivatives used for hedging

This note includes additional information on the balance sheet headings “Derivatives used for hedging” and “Fair value changes of the hedged items in portfolio hedge of interest rate risk”. The Company only uses derivatives and hedge accounting for hedging interest rate risk.

General explanation

Hedge accounting (accounting treatment of hedging transactions in IFRS) can be used for derivatives that are intended to be used for hedging, provided certain criteria are met. The criteria for the accounting treatment of a derivative as a hedging instrument include:

- The hedging instrument, the hedged item and the purpose and strategy of the hedging and the party involved must be officially documented before hedge accounting is applied;
- The hedge must be documented, demonstrating that it is expected to be highly effective (within a range of 80% to 125% of the ‘dollar offset ratio’) in offsetting changes in fair value (or cash flows) attributable to the hedged risk throughout the entire reporting period;
- The hedge is effective from the start and is continuously assessed.



The global dollar offset ratio (“DOR”) is calculated as the change in value of the hedging instrument versus the change in value of the hedged item compared to the previous reporting period (on a quarterly basis). For the value of the hedged item, the value of the fixed leg of the underlying hedging derivatives is taken as proxy (discounted on a swap curve with 3-month tenor). The value of the hedging derivative is the “clean price” (fair value without interest accrued but not yet paid) (discounted on the OIS curve). It is possible for the Dollar Offset Ratio (DOR) of an individual swap to fall outside the 80%-125% interval when small fluctuations in value occur. According to general hedge accounting documentation, deviations in the Dollar Offset Ratio (DOR) caused by small fluctuations in value are considered an acceptable reason for falling outside the 80%-125% range.

In addition a monthly prospective test is performed to ensure that the hedge accounting capacity (capital and interest) for the hedged portfolio—considering expected maturities rather than contractual maturities—exceeds the space occupied by existing hedges. Within the monitoring of the prospective test regarding capital, a sufficiently large buffer is maintained to accommodate the possibility that all executed swaptions gain intrinsic value.

Note on macro hedges

The Company continues to apply IAS 39, which has been authorised by the EU, because it reflects the way the Company manages its activities. The option to continue applying IAS 39 was provided for in the new IFRS 9 standard.

Hedge relationships are intended to limit the interest rate risk ensuing from the selected category of assets (or liabilities) which fall within the definition of qualifying hedged items.

The Company performs an overall analysis of the interest rate risk and selects assets (and/or liabilities) that need to be included in the hedging of the interest rate risk of the portfolio. At the outset it defines the risk position to be hedged, the duration, the way in which the tests are conducted and the frequency thereof.

The Company has opted to hedge a portfolio of loans with a fixed interest rate and selects the hedged items within that portfolio as a function of the interest rate risk management strategy. The assessment of the effectiveness consists of checking whether the purpose of the hedge, i.e. limiting the interest rate risk, has been achieved.

With *hedge accounting*, the changes in the fair value of the fixed rate legs of these swaps are offset by opposite changes in the fair value of the hedged items. The fluctuations in the fair value of the floating rate components of the swaps have a net impact on the results.

It concerns a fair value hedge, whereby the hedged risk consists of the benchmark (Euribor), which is the interest rate component of the fixed-rate loans. The gains or losses on the hedged items as a result of the hedged risk, and the gains or losses on the hedging instruments are recognised in the statement of profit or loss.

The changes in fair value of the hedged items (in this case a hedged portfolio of mortgage loans) can be found under the heading “Fair value changes of the hedged items in portfolio hedge of interest rate risk” and amounted to EUR -937,134,618 on 31 December 2024. It concerns macro *fair value hedges* of the interest rate risk on a hedged mortgage portfolio.

Macro hedge – fair value hedging	Number	Notional	31/12/2023	Number	Notional	31/12/2024
Change in the fair value of hedged items			-1,245,442,292			-937,134,618
Derivatives with negative fair value (clean price)	28	3,700,000,000	-163,508,044	45	6,525,000,000	-257,338,977
Derivatives with positive fair value (clean price)	107	15,700,000,000	1,375,539,202	125	17,085,000,000	1,120,296,645

In the table above, the clean price is included in order to provide a link between the swaps involved in the hedge accounting and the change in the fair value of the hedged items. The clean price is used to calculate the hedge effectiveness, while the carrying amount of the derivatives concerned in the balance sheet includes accrued but not yet paid interest (“dirty price”).

Swaptions have also been concluded in the context of the macro coverage of the interest rate risk. Hedge accounting can be applied to the intrinsic value of the swaptions. The time value of these instruments ends up in the profit and loss based on the changes in the fair value of these instruments. As long as the option for entering into the swap has not been exercised, a one-sided interest rate risk is hedged.

At 31 December 2024, the Company had concluded 6 payer swaptions for a nominal amount of EUR 850 million. At 31 December 2024, these had an intrinsic value of EUR 102.3 million, so a change in fair value of the hedged items of EUR 101.4 million was recorded. At 31 December 2024, the Company had also concluded 14 receiver swaptions for a nominal amount of EUR 1,685 million. The time value is not included in the fair value (clean price) in the table above as it is not part of the hedging relationship.

Note on micro hedges

The Bank Pool also concludes swaps to hedge the interest rate risk on individual instruments (so-called *micro-hedges*).

Swaps have been entered into to hedge purchased securities that are included under “Financial assets at fair value through other comprehensive income”. The changes in the fair value of the fixed rate legs of these swaps are offset by opposite changes in the fair value of the hedged items.

Part of the change in fair value of the “Financial assets at fair value through other comprehensive income” is not recorded on a separate line in equity, but is recognised in the statement of profit or loss in the context of hedge accounting. On 31 December 2024, this involved an amount of EUR 24,787,045.

Since 2022, own securities issued have also been hedged under “Financial liabilities at amortised cost”.



Micro hedge – fair value hedging	Number	Notional	31/12/2023	Number	Notional	31/12/2024
Change in the fair value of hedged items, assets			-39,913,175			-24,787,045
Derivatives with negative fair value (clean price)	0	0	0	0	0	0
Derivatives with positive fair value (clean price)	11	836,373,888	39,978,996	10	582,576,388	24,910,480
Change in the fair value of hedged items, liabilities			59,006,487			18,125,491
Derivatives with negative fair value (clean price)	4	2,000,000,000	-59,003,078	3	1,500,000,000	-18,356,929
Derivatives with positive fair value (clean price)	0	0	0	0	0	0

In the table above, the clean price is included in order to provide a link between the swaps involved in the hedge accounting and the change in the fair value of the hedged items.

Note on total derivatives used for hedging

At 31 December 2024, all swaps are treated as fair value hedges. The table below shows the derivative instruments as recognised in the balance sheet, and also shows the total market value recognised under the applicable IFRS hedge accounting rules.

Fair value (dirty price) of derivatives used for hedging		31/12/2023		31/12/2024
Derivatives used for hedging (assets)		1,425,057,322		1,175,707,254
Fair value macro hedges	1,387,686,946		1,151,718,914	
Fair value micro hedges	37,370,376		23,988,341	
Derivatives used for hedging (liabilities)		242,563,370		316,370,716
Fair value macro hedges	179,855,154		299,265,883	
Fair value micro hedges	62,708,216		17,104,833	
Cash flow hedges	0		0	

Further information can be found in Notes 2 and 32.

The table below gives an overview of the maturity dates of the derivative positions.

31/12/2023	Notional	1 year	1-5 years	5-10 years	10-15 years	> 15 years
Macro hedge – fair value hedging	19,400,000,000	3,800,000,000	4,900,000,000	3,850,000,000	4,250,000,000	2,600,000,000
Micro hedge – fair value hedging	2,836,373,888	753,797,500	1,814,815,000	267,761,388	0	0

31/12/2024	Notional	1 year	1-5 years	5-10 years	10-15 years	> 15 years
Macro hedge – fair value hedging	23,610,000,000	2,100,000,000	9,735,000,000	4,650,000,000	4,900,000,000	2,225,000,000
Micro hedge – fair value hedging	2,082,576,388	1,049,578,000	1,032,998,388	0	0	0

14. Investments in associates and joint ventures

Investments in associates and joint ventures relates to participating interests in European Projects Investment Company (EPICo) and Jofico.

The investments in EPICo, a Benelux infrastructure fund, concern a participating interest of 27.46%.

The investments in Jofico consist of a participating interest of 20.00%. Jofico is a joint venture between Aspa, the former Axa Bank, Crelan, VDK Bank and Bpost that jointly manages all these institutions' ATMs.

	31/12/2023	31/12/2024
Investments in joint ventures	56,700	63,628
Investments in associates	4,467,165	4,561,697
of which not individually material	4,523,865	4,625,325
Total	4,523,865	4,625,325

The Company revalued its participations in EPICo and Jofico on 31 December 2024, recognising a profit of EUR 101,460 in the statement of profit or loss.

	31/12/2023	31/12/2024
Share of investments in associates that are not individually material	4,523,865	4,625,325
Profit before taxes	35,019	101,460
Net profit	35,019	101,460
Other comprehensive income	0	0
Total impact of the comprehensive income	35,019	101,460

15. Tangible assets

Tangible assets are recognised based on the cost model and on 31 December were as follows:

	31/12/2023	31/12/2024
Property, plant and equipment	63,482,377	67,503,756
Investment property	850,767	842,063
Total	64,333,143	68,345,819
Fair value of investment properties	850,767	842,063

The “Property, plant and equipment” item contains the head office building that is leased from Investar, with an asset (right of use) created that is depreciated over the term of the contract.

The investment properties portfolio consists mainly of properties purchased in the context of the mortgage lending foreclosure policy. In addition, on an exceptional basis the Company co-invests in premises used as office buildings by self-employed branch managers. These are also accounted for under investment properties.

	Property (leasing)	IT	IT (leasing)	Other equipment	Other equipment (leasing)	Total	Investment property
Acquisition value at 1 January 2023	58,292,305	22,254,404	6,158,744	22,360,125	6,833,177	115,898,755	926,495
Leasing additions and write-offs	-2,769,568	0	-15,592	0	-404,061	-3,189,220	0
Acquisitions	0	3,162,570	0	666,141	0	3,828,711	0
Disposals	0	-4,696,469	0	-920,006	0	-5,616,475	-6,547
Transfers	0	0	0	0	0	0	0
Other changes	0	3,408	0	54,940	0	58,348	0
Acquisition value at 31 December 2023	55,522,737	20,723,913	6,143,152	22,161,199	6,429,116	110,980,118	919,948
Accumulated depreciation and impairment losses at 1 January 2023	-10,491,041	-14,939,697	-3,417,733	-7,758,895	-4,517,926	-41,125,292	-60,784
Leasing additions and write-offs	320,570	0	33,833	0	1,292,005	1,646,408	0
Acquisitions	0	0	0	0	0	0	0
Disposals	0	4,336,689	0	814,606		5,151,295	1,148
Depreciation	-4,541,014	-3,792,606	-1,043,847	-2,055,498	-1,741,766	-13,174,731	-9,545
Transfers	0	0	0	0	0	0	0
Other changes	0	0	0	4,582	0	4,582	0
Accumulated depreciation and impairment losses at 31 December 2023	-14,711,485	-14,395,614	-4,427,747	-8,995,205	-4,967,687	-47,497,737	-69,181
Net carrying amount at 31 December 2023	40,811,252	6,328,299	1,715,402	13,165,994	1,461,429	63,482,377	850,767



	Property (leasing)	IT	IT (leasing)	Other equipment	Other equipment (leasing)	Total	Investment property
Acquisition value at 1 January 2024	55,522,737	20,723,913	6,143,152	22,161,199	6,429,116	110,980,118	919,948
Leasing additions and write-offs	3,241,524	0	-3,152,419	0	6,157,384	6,246,489	0
Acquisitions	0	5,295,708	0	401,391	0	5,697,099	0
Disposals	0	-226,217	0	-1,954,998	0	-2,181,215	0
Transfers	0	0	0	0	0	0	0
Other changes	0	-62,451	0	-124,554	0	-187,005	0
Acquisition value at 31 December 2024	58,764,261	25,730,953	2,990,734	20,483,038	12,586,500	120,555,485	919,948
Accumulated depreciation and impairment losses at 1 January 2024	-14,711,485	-14,395,614	-4,427,747	-8,995,205	-4,967,687	-47,497,737	-69,181
Leasing additions and write-offs	1,440,108	0	3,153,921	0	2,495,734	7,089,763	0
Acquisitions	0	0	0	0	0	0	0
Disposals	0	192,580	0	1,802,320	0	1,994,899	0
Depreciation	-5,031,659	-4,119,283	-423,244	-2,447,485	-2,712,269	-14,733,940	-8,704
Transfers	0	0	0	0	0	0	0
Other changes	0	0	0	95,286	0	95,286	0
Accumulated depreciation and impairment losses at 31 December 2024	-18,303,036	-18,322,317	-1,697,070	-9,545,085	-5,184,222	-53,051,729	-77,885
Net carrying amount at 31 December 2024	40,461,225	7,408,636	1,293,664	10,937,954	7,402,278	67,503,756	842,063



16. Intangible assets and goodwill

On 31 December, the intangible assets measured under the cost model were composed as follows:

	Purchased software	Developed software	Goodwill	Total
Acquisition value at 1 January 2023	18,511,977	122,371,850	98,150,460	239,034,287
Leasing additions and write-offs	0	0	0	0
Acquisitions	528,802	3,997,715	0	4,526,517
Disposals	-751,179	-48,871,072	0	-49,622,251
Transfers	0	0	0	0
Other changes	0	-47,906	0	-47,906
Acquisition value at 31 December 2023	18,289,600	77,450,587	98,150,460	193,890,647
Accumulated amortisation and impairment losses at 1 January 2023	-15,042,623	-94,685,167	0	-109,727,790
Leasing additions and write-offs	0	0	0	0
Acquisitions	0	0	0	0
Disposals	718,566	48,590,590	0	49,309,156
Amortisation	-1,063,342	-10,868,953	0	-11,932,295
Transfers	0	0	0	0
Other changes	0	0	0	0
Accumulated amortisation and impairment losses at 31 December 2023	-15,387,398	-56,963,530	0	-72,350,929
Net carrying amount at 31 December 2023	2,902,201	20,487,057	98,150,460	121,539,717



	Purchased software	Developed software	Goodwill	Total
Acquisition value at 1 January 2024	18,289,600	77,450,587	98,150,460	193,890,647
Leasing additions and write-offs	0	0	0	0
Acquisitions	175,991	6,300,331	0	6,476,322
Disposals	28,856	-28,191,325	0	-28,162,469
Transfers	0	0	0	0
Other changes	0	0	0	0
Acquisition value at 31 December 2024	18,494,446	55,559,593	98,150,460	172,204,499
Accumulated amortisation and impairment losses at 1 January 2024	-15,387,398	-56,963,530	0	-72,350,929
Leasing additions and write-offs	0	0	0	0
Acquisitions	0	0	0	0
Disposals	-15,756	28,191,325	0	28,175,569
Amortisation	-1,055,351	-8,737,322	0	-9,792,673
Transfers	0	0	0	0
Other changes	0	0	0	0
Accumulated amortisation and impairment losses at 31 December 2024	-16,458,506	-37,509,527	0	-53,968,033
Net carrying amount at 31 December 2024	2,035,941	18,050,066	98,150,460	118,236,466

The amortisation of EUR 9,792,673 for the 2024 financial year can be found in the statement of profit or loss under amortisation.

In 2024, EUR 28.2 million of capitalised costs (fully amortised) of self-developed software was retired.

Goodwill is defined as the portion of the cost of the acquisition of a business combination that exceeds the fair value of the identifiable assets, liabilities and contingent liabilities acquired. It is calculated as of the date of acquisition.

At the end of each year, goodwill is tested for impairment by comparing the realisable value of the cash generating unit (CGU) with the carrying amount. The cash-generating unit is identical to the legal entity Aspa.

The recoverable amount of the CGU Aspa is determined by measuring the present value of the expected cash flow (dividends and free capital). The following data are used here:

- The latest update of the 5-year financial plan as approved by management and the Board of Directors;
- Discount rate: an ROE of 9.00%;
- Long-term growth for Belgium and the Netherlands of 1.65%.

Based on the analysis, no impairment loss needs to be recorded on goodwill.



17. Tax assets and liabilities

The tax position can be summarised as follows:

	31/12/2023	31/12/2024
Current tax assets	87,742,446	107,266,025
Deferred tax assets	14,215,485	308,500
Total tax assets	101,957,932	107,574,525
Current tax liabilities	4,189,420	6,770,591
Deferred tax liabilities	45,568,359	33,327,976
Total tax liabilities	49,757,779	40,098,567
Total globalised deferred taxes	-31,352,874	-33,019,476

The deferred taxes originate in the following elements:

Deferred taxes by type	31/12/2022	Changes in classification as a result of the initial application of IFRS 17	Changes through other comprehensive income	Changes through profit or loss	31/12/2023	Changes through other comprehensive income	Changes through profit or loss	31/12/2024
Tax assets on derivatives	0	0	0	0	0	0	0	0
DRD and fiscal losses	30,884,100	0	0	-19,305,116	11,578,984	0	-11,578,983	0
Tax liabilities on financial instruments at fair value	45,934,724	12,227,233	-38,157,159	-423,762	19,581,035	-14,248,705	-530,715	4,801,616
Tax assets on other items	10,415,432	0	1,452,574	1,488,126	13,356,132	977,575	-784,835	13,548,872
Total decompen-sated tax assets	87,234,256	12,227,233	-36,704,586	-18,240,751	44,516,152	-13,271,130	-12,894,533	18,350,489
Tax liabilities on financial instruments at fair value	0		0	0	0	0	0	0
Tax liabilities on financial instruments at amortised cost	24,152,479		0	2,780,846	26,933,325	0	2,553,254	29,486,579
Tax liabilities on derivatives	13,183,398		0	-3,295,483	9,887,916	0	-4,618,753	5,269,163



Tax liabilities on (re) insurance	88,682,561		-49,299,544	-335,233	39,047,784	-21,446,502	-987,059	16,614,223
Tax liabilities on other items	0		0	0	0	0	0	0
Total decompen-sated tax liabilities	126,018,439	0	-49,299,544	-849,870	75,869,025	-21,446,502	-3,052,558	51,369,965
Compen-sated tax assets	-38,784,183	12,227,233	12,594,958	-17,390,882	-31,352,873	8,175,372	-9,841,975	-33,019,476

The main items in 2024 were a deferred tax liability of EUR 29,486,579 on the measurement at amortised cost (with the effective interest rate), a tax liability of EUR 16,614,223 on (re)insurance and a tax asset of EUR 13,548,872 linked to the ECL (stage 1 and stage 2) and pension liabilities (IAS 19). The deferred tax liabilities on derivatives decreased in 2024 as a result of the negative development of the fair value. The elimination of the tax asset relating to tax loss carry forwards is the result of using the transferred DRD (Dividends Received Deduction) deduction and tax losses in the calculation of the current corporate tax.

When creating deferred tax assets (DTAs), an assessment is always made as to whether they can be used. There were no DRD or deferred taxes in the Company at the end of 2024.

Note 37 provides further information of the impact of corporate taxes on the Company's result.



18. Assets and liabilities under insurance and reinsurance contracts

General

Within the non-life insurance segment Aras focuses exclusively on the private sector (only euro contracts in Belgium). Aras is currently active in the following areas:

- Motor insurance
- Fire insurance
- Civil liability insurance (family insurance)
- Legal assistance
- Accident insurance

There are three modules available for motor insurance and motorcycle insurance:

- Civil liability module, which is a compulsory cover
- Semi-comprehensive module, with cover for civil liability, theft, glass breakage, natural disasters and collision with animals
- Fully comprehensive module, which includes all our semi-comprehensive covers with additional own loss protection

All the modules include free assistance if the customer has a road accident with the insured vehicle in Belgium or 20 km beyond our borders. The options here are Legal Assistance Safe and Driver +. Aras also provides motorcycle insurance that includes the compulsory civil liability with a legal assistance option.

The “Verzekerd Wonen” insurance policy of Aras provides fire insurance with an extensive cover. For homeowners, there are two modules that comprehensively protect the home:

- “Basis” module: good protection of the home for Buildings and Contents with a legal assistance option
- “Comfort” module: comprehensive protection of the home for Buildings, Contents, Theft and Indirect Losses with a legal assistance option

For tenants, there are also two modules:

- The “Basis” module that protects our tenants against their Rental Liability and Contents of the home with legal assistance option
- The “Comfort” module with the covers for Rental Liability, Contents of the home, Theft and Indirect Losses, also with the legal assistance option

The customer can combine the Fire and Family cover through the combined insurance product “Verzekerd Wonen Plus”. With the “Comfort” module the customer is automatically insured for these additional costs.

The majority of the civil liability insurance policies (family insurance policies) are sold in a package of Fire and Family insurance policies, “Verzekerd Wonen Plus”. It is also possible to conclude a separate Family Insurance policy that protects the whole family against unexpected events.

For IFRS 17, the non-life portfolio will be split into 5 portfolios: Comprehensive, General Motor Vehicle Liability, General Liability, Legal Assistance and Fire.

Within life insurance (including hospitalisation) Aras also focuses exclusively on the private sector (only euro contracts in Belgium). Hospitalisation, outstanding balance and temporary life insurance are included in the life risk segment. “Argenta Flexx” and “Argenta Life Plan” are included under life savings.

There has been no further new production in hospitalisation insurance since the beginning of 2019, just extensions of existing contracts. Hospitalisation insurance follow-up and customer support was outsourced to Vanbreda Risk & Benefits.

For IFRS 17, hospitalisation insurance is classified as a separate portfolio.

Argenta Assuranties provides a range of life insurance policies, which can be classified in product lines. This classification originates from the type of cover being provided. An outline of the respective product lines is given below:

- “Schuldsaldo” (Outstanding balance): the outstanding balance of a loan is repaid by Aras on the death of the insured through outstanding balance insurance;
- “Tijdelijke Overlijdensverzekering” (Temporary life insurance): this insurance, which only represents a small amount of insurance premium income, serves to cover a pre-determined capital amount during a specified period in the event of death;
- “Argenta-Flexx” (branch 21): a savings plan policy that makes tax deductibility possible. The minimum term is 10 years;
- “Argenta Life Plan” (branch 21): is an open-ended branch 21 insurance product.

For IFRS 17, life insurance is split into 12 portfolios: “Schuldsalddoverzekering op 1 hoofd”, “Schuldsalddoverzekering op 2 hoofden”, “Tijdelijke verzekering overlijden”, “Argenta Life Plan”, “Argenta Flexx”, “Gemengde verzekering”, “Jeugdsparen”, “Kapitaal plus”, “Kindersparen”, “Leven Plus”, “Uitgesteld kapitaal met tegenverzekering” and “Pension Life”. The last seven portfolios were not discussed above in the product overview, as they are no longer marketed.



Balance sheet

The assets and liabilities under insurance and reinsurance contracts as of 31 December break down as shown below.

	31/12/2023	31/12/2024
Insurance contracts		
Insurance contract assets	0	-3,037,654
Insurance contract liabilities	2,683,342,397	2,824,567,144
Reinsurance contracts		
Reinsurance contract assets	-27,259,304	-27,260,527
Reinsurance contract liabilities	15,637,315	17,387,420

For each reporting segment under insurance and reinsurance contracts this is made up as follows:

31/12/2023	Life risk	Life savings	Life reinsurance	Non-life	Total
Insurance contracts					
Insurance contract assets	0	0	0	0	0
Insurance contract liabilities	52,990,886	2,469,501,610	0	160,849,900	2,683,342,397
Reinsurance contracts					
Reinsurance contract assets	0	0	-21,229,110	-6,030,194	-27,259,304
Reinsurance contract liabilities	0	0	15,503,690	133,625	15,637,315
31/12/2024	Life risk	Life savings	Life reinsurance	Non-life	Total
Insurance contracts					
Insurance contract assets	-3,037,654	0	0	0	-3,037,654
Insurance contract liabilities	35,841,106	2,626,662,135	0	162,063,903	2,824,567,144
Reinsurance contracts					
Reinsurance contract assets	0	0	-22,360,849	-4,899,677	-27,260,527
Reinsurance contract liabilities	0	0	16,816,263	571,156	17,387,420

The amounts included in the tables above can each be reconciled with the opening assets and liabilities and closing assets and liabilities amounts in the analysis tables below by remaining coverage and by component.

The following table shows how the net carrying amount of insurance and reinsurance contracts during the year has changed as a result of cash flows and amounts recognised in the statement of profit or loss and OCI. The transfers in the table below are transfers from reserves within the branch 44 product to the branch 23 component (which is measured under IFRS 9). Other changes relate to changes in actual and estimated cash flows and experience adjustments.



31/12/2023	Insurance	Reinsurance
Balance at 1 January	2,546,563,874	-7,254,180
Premiums received/(paid)	416,041,297	-23,197,951
(Claims and expenses paid)/Amounts received	-324,735,291	15,638,015
Transfer	-53,317,255	0
Insurance revenue	-193,250,941	4,975,271
Insurance service expenses	191,670,717	1,263,312
Insurance finance expenses (P&L)	-24,656,283	16,870
Insurance finance expenses (OCI)	184,861,995	-82,677
Other changes	-59,835,714	-2,980,650
Balance at 31 December	2,683,342,397	-11,621,990

31/12/2024	Insurance	Reinsurance
Balance at 1 January	2,683,342,397	-11,621,990
Premiums received/(paid)	448,653,334	-25,079,861
(Claims and expenses paid)/Amounts received	-366,603,992	16,179,399
Transfer	-19,514,405	0
Insurance revenue	-205,775,256	1,977,067
Insurance service expenses	153,523,261	-209,739
Insurance finance expenses (P&L)	-30,391,507	14,971
Insurance finance expenses (OCI)	103,500,660	1,781,077
Other changes	54,794,998	7,085,969
Balance at 31 December	2,821,529,490	-9,873,107

Results

The breakdown of the insurance service result is shown in the tables below.

31/12/2023	Life risk	Life savings	Non-life	Total
Insurance revenue	63,615,002	14,086,415	141,182,192	218,883,609
Insurance service expenses	-44,904,350	-40,403,422	-108,289,547	-193,597,319
Insurance service result	18,710,652	-26,317,007	32,892,645	25,286,290

31/12/2024	Life risk	Life savings	Non-life	Total
Insurance revenue	77,189,085	11,973,250	153,715,743	242,878,078
Insurance service expenses	-41,917,428	-42,192,098	-128,971,206	-213,080,731
Insurance service result	35,271,657	-30,218,847	24,744,538	29,797,348

Insurance revenue and insurance service expenses reconcile to the amounts in the tables below with an analysis by remaining coverage and incurred claims for each of the segments. For Non-Life, there is a limited difference due to the intercompany elimination of EUR 2,822 in 2024 and EUR 2,864 in 2023.

The breakdown of the reinsurance service result is shown in the tables below.

31/12/2023	Life	Non-life	Total
Reinsurance revenue	18,871,367	435,749	19,307,115
Reinsurance service expenses	-14,585,810	-6,042,659	-20,628,468
Reinsurance service result	4,285,557	-5,606,910	-1,321,353

31/12/2024	Life	Non-life	Total
Reinsurance revenue	20,900,560	-1,177,031	19,723,529
Reinsurance service expenses	-19,695,073	-7,161,591	-26,856,663
Reinsurance service result	1,205,487	-8,338,622	-7,133,134

Reinsurance service expenses reconcile to the amounts in the tables below by component (with allocation of reinsurance contracts paid). Reinsurance revenue refers to the sum of all other components.

Insurance revenue

On 31 December, the insurance income consists of:

31/12/2023	Life savings	Life risk	Non-life	Total
Contracts not measured under the PAA				
Amounts relating to change in liabilities for remaining coverage				
CSM for services provided	513,069	9,349,031		9,862,100
Change in risk adjustment for non-financial risk expired	480,091	7,695,489		8,175,580
Accrued expected claims and other insurance service expenses	11,880,883	46,603,066		58,483,949
Other	491,621	-1,128,921		-637,300
Recovery of insurance acquisition cash flows	720,751	1,096,337		1,817,088
	14,086,415	63,615,002		77,701,417
Contracts measured under the PAA	0	0	141,179,328	141,179,328
Total insurance revenue	14,086,415	63,615,002	141,179,328	218,880,745



31/12/2024	Life savings	Life risk	Non-life	Total
Contracts not measured under the PAA				
Amounts relating to change in liabilities for remaining coverage				
CSM for services provided	496,487	10,740,919		11,237,405
Change in risk adjustment for non-financial risk expired	153,372	8,405,863		8,559,235
Accrued expected claims and other insurance service expenses	3,515,018	56,496,370		60,011,388
Other	5,807,668	-1,315,982		4,491,686
Recovery of insurance acquisition cash flows	1,997,883	2,861,915		4,859,799
	11,970,428	77,189,085		89,159,513
Contracts measured under the PAA	0	0	153,715,743	153,715,743
Total insurance revenue	11,970,428	77,189,085	153,715,743	242,875,256

For each segment, the Company presents a table with a separate analysis of the changes in the liabilities for remaining coverage and changes in the liabilities for incurred claims, and the connection between these changes and the items in the statement of profit or loss and equity.



A second reconciliation is presented for contracts that are not measured under the PAA, which separately shows changes in the estimates of the present value of future cash flows, the risk adjustment for non-financial risks and the CSM. In the component tables, “Other contracts” refers to those underwritten as from 1 January 2022 (new business).

Life risk

The analysis per component for the Life risk segment consists of:

31/12/2023	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	CSM			Subtotal	Total
			Contracts under full retrospective transition approach	Contracts under fair value transition approach	Other contracts		
Opening assets	0	0	0	0	0	0	0
Opening liabilities	-209,939,074	111,327,254	50,546,036	84,721,931	15,488,403	150,756,370	52,144,550
Net opening balance	-209,939,074	111,327,254	50,546,036	84,721,931	15,488,403	150,756,370	52,144,550
Changes in the statement of profit or loss and OCI							
Changes that relate to current services							0
CSM recognised for services provided	0	0	-3,774,773	-4,375,885	-1,198,373	-9,349,031	-9,349,031
Change in risk adjustment for non-financial risks expired	0	-8,465,082	0	0	0	0	-8,465,082
Experience adjustments	-19,915,872		0	0	0	0	-19,915,872
Changes that relate to future services							
Contracts initially recognised in the year	-5,387,316	4,961,015	0	0	3,750,717	3,750,717	3,324,417
Changes in estimates that adjust the CSM	12,517,633	9,623,940	-15,831,583	357,460	-6,667,449	-22,141,573	0
Changes in estimates that result in losses and reversals of losses and reversals of losses on onerous contracts	13,030,446	4,678	0	0	0	0	13,035,125
Changes that relate to past services							
Adjustments to liabilities for incurred claims	2,877,041	-217,251	0	0	0	0	2,659,790
Insurance service result	3,121,933	5,907,301	-19,606,356	-4,018,426	-4,115,105	-27,739,886	-18,710,652
Net finance expenses from insurance contracts	-9,765,623	0	96,464	-250,134	353,502	199,832	-9,565,791
Total changes in the statement of profit or loss and OCI	-6,643,691	5,907,301	-19,509,892	-4,268,559	-3,761,603	-27,540,054	-28,276,444
Cash flows	29,122,780	0	0	0	0	0	29,122,780
Transfer to other items in the statement of financial position	0	0	0	0	0	0	0
Closing assets	0	0	0	0	0	0	0
Closing liabilities	-187,459,985	117,234,555	31,036,144	80,453,372	11,726,800	123,216,317	52,990,886
Net closing balance	-187,459,985	117,234,555	31,036,144	80,453,372	11,726,800	123,216,317	52,990,886



31/12/2024	CSM						
	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	Contracts under full retrospective transition approach	Contracts under fair value transition approach	Other contracts	Subtotal	Total
Opening assets	0	0	0	0	0	0	0
Opening liabilities	-187,459,985	117,234,555	31,036,144	80,453,372	11,726,800	123,216,317	52,990,886
Net opening balance	-187,459,985	117,234,555	31,036,144	80,453,372	11,726,800	123,216,317	52,990,886
Changes in the statement of profit or loss and OCI							
Changes that relate to current services							
CSM recognised for services provided	0	0	-3,126,868	-6,411,059	-1,202,991	-10,740,919	-10,740,919
Change in risk adjustment for non-financial risks expired	0	-8,746,929	0	0	0	0	-8,746,929
Experience adjustments	-27,752,738	0	0	0	0	0	-27,752,738
Changes that relate to future services							
Contracts initially recognised in the year	-4,288,177	5,151,140	0	0	1,034,597	1,034,597	1,897,560
Changes in estimates that adjust the CSM	-49,070,009	4,898,082	-3,235,776	47,439,018	-31,314	44,171,927	0
Changes in estimates that result in losses and reversals of losses and reversals of losses on onerous contracts	6,137,893	-2,169,462	0	0	0	0	3,968,431
Changes that relate to past services							
Adjustments to liabilities for incurred claims	6,407,234	-304,296	0	0	0	0	6,102,938
Insurance service result	-68,565,798	-1,171,465	-6,362,645	41,027,959	-199,709	34,465,605	-35,271,657
Net finance expenses from insurance contracts	2,381,891	-23,227,506	75,826	254,197	226,890	556,913	-20,288,701
Total changes in the statement of profit or loss and OCI	-66,183,906	-24,398,971	-6,286,818	41,282,156	27,181	35,022,518	-55,560,359
Cash flows	35,372,924	0	0	0	0	0	35,372,924
Transfer to other items in the statement of financial position	0	0	0	0	0	0	0
Closing assets	-37,012,632	11,047,745	15,551,435	0	7,375,798	22,927,233	-3,037,654
Closing liabilities	-181,258,335	81,787,839	9,197,891	121,735,527	4,378,184	135,311,602	35,841,106
Net closing balance	-218,270,967	92,835,584	24,749,326	121,735,527	11,753,981	158,238,835	32,803,452



The analysis per remaining coverage and incurred claims for the Life risk segment consists of:

31/12/2023	Liabilities for remaining coverage		Liabilities for incurred claims	Total
	excluding loss component	loss component		
Opening assets	0	0	0	0
Opening liabilities	45,322,313	19,946	6,802,291	52,144,550
Net opening balance	45,322,313	19,946	6,802,291	52,144,550
Changes in the statement of profit or loss and OCI				
Contracts under full retrospective transition	-21,212,789	0	0	-21,212,789
Contracts under fair value transition	-31,027,246	0	0	-31,027,246
Other contracts	-11,374,967	0	0	-11,374,967
Insurance revenue	-63,615,002	0	0	-63,615,002
Insurance service expenses				
Incurred claims and other insurance service expenses	0	0	38,793,217	38,793,217
Amortisation of insurance acquisition cash flows	1,096,337	0	0	1,096,337
Losses and reversals of losses on onerous contracts	0	2,355,006	0	2,355,006
Adjustments to liabilities for incurred claims	0	0	2,659,790	2,659,790
Insurance service expenses	1,096,337	2,355,006	41,453,007	44,904,350
Investment components and premium refunds	0	0	0	0
Insurance service result	-62,518,665	2,355,006	41,453,007	-18,710,652
Net finance expenses from insurance contracts	-9,466,907	-66,623	-32,261	-9,565,791
Total changes in the statement of profit or loss and OCI	-71,985,573	2,288,383	41,420,746	-28,276,444
Cash flows				
Premiums received	81,484,530	0	0	81,484,530
Claims and other insurance service expenses paid, including investment components	0	0	-41,863,148	-41,863,148
Insurance acquisition cash flows	-10,498,601	0	0	-10,498,601
Total cash flows	70,985,929	0	-41,863,148	29,122,780
Transfer to other items in the statement of financial position				
Closing assets	0	0	0	0
Closing liabilities	44,322,668	2,308,329	6,359,889	52,990,886
Net closing balance	44,322,668	2,308,329	6,359,889	52,990,886



31/12/2024	Liabilities for remaining coverage		Liabilities for incurred claims	Total
	excluding loss component	loss component		
Opening assets	0	0	0	0
Opening liabilities	44,322,668	2,308,329	6,359,889	52,990,886
Net opening balance	44,322,668	2,308,329	6,359,889	52,990,886
Changes in the statement of profit or loss and OCI				
Contracts under full retrospective transition	-20,382,486	0	0	-20,382,486
Contracts under fair value transition	-40,614,987	0	0	-40,614,987
Other contracts	-16,191,612	0	0	-16,191,612
Insurance revenue	-77,189,085	0	0	-77,189,085
Insurance service expenses				
Incurred claims and other insurance service expenses	0	0	33,872,334	33,872,334
Amortisation of insurance acquisition cash flows	2,861,915	0	0	2,861,915
Losses and reversals of losses on onerous contracts	0	-919,760	0	-919,760
Adjustments to liabilities for incurred claims	0	0	6,102,938	6,102,938
Insurance service expenses	2,861,915	-919,760	39,975,272	41,917,428
Investment components and premium refunds	0	0	0	0
Insurance service result	-74,327,170	-919,760	39,975,272	-35,271,657
Net finance expenses from insurance contracts	-21,302,703	909,067	104,935	-20,288,701
Total changes in the statement of profit or loss and OCI	-95,629,873	-10,693	40,080,208	-55,560,358
Cash flows				
Premiums received	83,810,266	0	0	83,810,266
Claims and other insurance service expenses paid, including investment components	0	0	-39,489,815	-39,489,815
Insurance acquisition cash flows	-8,947,527	0	0	-8,947,527
Total cash flows	74,862,739	0	-39,489,815	35,372,924
Transfer to other items in the statement of financial position	0	0	0	0
Closing assets	-3,438,411	119,854	280,903	-3,037,654
Closing liabilities	26,993,946	2,177,782	6,669,379	35,841,106
Net closing balance	23,555,534	2,297,636	6,950,282	32,803,452



Insurance revenue increased by EUR 13.5 million from EUR 63.6 million to EUR 77.1 million in the life risk segment. The release of expected cash flows for insurance expenses is allocated to the recovery of loss component to a smaller extent in 2024, as it is exhausted for some cohorts. As a result, more release is allocated to insurance revenue.

During 2024, we recorded a decrease in the estimate of future obligations mainly due to an increase in expected hospitalisation insurance premiums. Partly as a result, the CSM for this product increased by EUR 41.2 million. For outstanding balance insurance, we saw an increase in operating expenses that contributed to a EUR 6.3 million decrease in CSM and an increase in the loss component. This increase in the loss component is overabsorbed by the release of expected cash flows for insurance expenses. Finally, the life risk loss component had a positive impact on the result of EUR 0.9 million due to the loss recovery effect of the expected cash flows.

Insurance finance expenses changed from revenue of EUR 9.6 million in 2023 to revenue of EUR 20.3 million in 2024. This is due to the fall in the discount curves over 2024.

In the 2023 figures, there was a shift between the column for liabilities for remaining coverage and the column for liabilities for incurred claims; this shift was made to be consistent with the 2024 table.



Life savings

The analysis per component for the Life savings segment consists of:

31/12/2023	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	CSM		Other contracts	Subtotal	Total
			Contracts under full retrospective transition approach	Contracts under fair value transition approach			
Opening assets	0	0	0	0	0	0	0
Opening liabilities	2,268,585,025	24,651,775	6,064,800	22,507,169	12,833,638	41,405,608	2,334,642,408
Net opening balance	2,268,585,025	24,651,775	6,064,800	22,507,169	12,833,638	41,405,608	2,334,642,408
Changes in the statement of profit or loss and OCI							
Changes that relate to current services							
CSM recognised for services provided	0	0	-62,581	-122,298	-328,191	-513,069	-513,069
Change in risk adjustment for non-financial risks expired	0	-1,734,337	0	0	0	0	-1,734,337
Experience adjustments	-51,109,404	0	0	0	0	0	-51,109,404
Changes that relate to future services							
Contracts initially recognised in the year	2,807,407	3,200,910	0	0	0	0	6,008,318
Changes in estimates that adjust the CSM	7,325,067	-75,621	-771,237	-19,789,341	13,311,132	-7,249,446	0
Changes in estimates that result in losses and reversals of losses and reversals of losses on onerous contracts	28,024,562	-888,191	0	0	0	0	27,136,371
Changes that relate to past services							
Adjustments to liabilities for incurred claims	46,529,128	0	0	0	0	0	46,529,128
Insurance service result	33,576,760	502,762	-833,818	-19,911,638	12,982,941	-7,762,515	26,317,007
Net finance expenses from insurance contracts	208,001,932	0	-6,528	-66,450	284,466	211,487	208,213,419
Total changes in the statement of profit or loss and OCI	241,578,692	502,762	-840,345	-19,978,088	13,267,407	-7,551,027	234,530,426
Cash flows	-99,671,224	0	0	0	0	0	-99,671,224
Transfer to other items in the statement of financial position	0	0	0	0	0	0	0
Closing assets	0	0	0	0	0	0	0
Closing liabilities	2,410,492,493	25,154,536	5,224,455	2,529,081	26,101,045	33,854,581	2,469,501,610
Net closing balance	2,410,492,493	25,154,536	5,224,455	2,529,081	26,101,045	33,854,581	2,469,501,610



31/12/2024	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	CSM			Subtotal	Total
			Contracts under full retrospective transition approach	Contracts under fair value transition approach	Other contracts		
Opening assets	0	0	0	0	0	0	0
Opening liabilities	2,410,492,493	25,154,536	5,224,455	2,529,081	26,101,045	33,854,581	2,469,501,610
Net opening balance	2,410,492,493	25,154,536	5,224,455	2,529,081	26,101,045	33,854,581	2,469,501,610
Changes in the statement of profit or loss and OCI							
Changes that relate to current services							
CSM recognised for services provided	0	0	-21,632	-60,038	-414,817	-496,487	-496,487
Change in risk adjustment for non-financial risks expired	0	-1,741,616	0	0	0	0	-1,741,616
Experience adjustments	-141,729,982	0	0	0	0	0	-141,729,982
Changes that relate to future services							
Contracts initially recognised in the year	15,581,783	2,756,706	0	0	0	0	18,338,489
Changes in estimates that adjust the CSM	11,559,580	50,820	-3,027,351	-1,871,801	-6,711,249	-11,610,400	0
Changes in estimates that result in losses and reversals of losses and reversals of losses on onerous contracts	9,852,643	4,491,487	0	0	0	0	14,344,130
Changes that relate to past services							
Adjustments to liabilities for incurred claims	141,504,313	0	0	0		0	141,504,313
Insurance service result	36,768,337	5,557,398	-3,048,983	-1,931,839	-7,126,066	-12,106,887	30,218,847
Net finance expenses from insurance contracts	134,944,025	-4,192,522	-100	7,991	852,628	860,518	131,612,021
Total changes in the statement of profit or loss and OCI	171,712,362	1,364,875	-3,049,083	-1,923,848	-6,273,438	-11,246,369	161,830,868
Cash flows	-4,668,833	0	0	0	0	0	-4,668,833
Transfer to other items in the statement of financial position	0		0	0	0	0	0
Closing assets	0	0	0	0	0	0	0
Closing liabilities	2,577,536,022	26,519,412	2,175,372	605,233	19,827,607	22,608,212	2,626,663,646
Net closing balance	2,577,536,022	26,519,412	2,175,372	605,233	19,827,607	22,608,212	2,626,663,646



The analysis per remaining coverage and incurred claims for the Life savings segment consists of:

31/12/2023	Liabilities for remaining coverage		Liabilities for incurred claims	Total
	excluding loss component	loss component		
Opening assets	0	0	0	0
Opening liabilities	2,303,204,262	6,336,965	25,101,181	2,334,642,408
Net opening balance	2,303,204,262	6,336,965	25,101,181	2,334,642,408
Changes in the statement of profit or loss and OCI				
Contracts under full retrospective transition	-4,697,196	0	0	-4,697,196
Contracts under fair value transition	-6,870,434	0	0	-6,870,434
Other contracts	-2,518,785	0	0	-2,518,785
Insurance revenue	-14,086,415	0	0	-14,086,415
Insurance service expenses				
Incurred claims and other insurance service expenses	0	0	-23,826,317	-23,826,317
Amortisation of insurance acquisition cash flows	-755,062	0	-184,657	-939,718
Losses and reversals of losses on onerous contracts	0	18,640,329	0	18,640,329
Adjustments to liabilities for incurred claims	0	0	46,529,128	46,529,128
Insurance service expenses	-755,062	18,640,329	22,518,154	40,403,422
Investment components and premium refunds	-247,813,956	0	247,813,956	0
Insurance service result	-262,655,433	18,640,329	270,332,111	26,317,007
Net finance expenses from insurance contracts	205,747,859	2,444,263	21,297	208,213,419
Total changes in the statement of profit or loss and OCI	-56,907,574	21,084,592	270,353,408	234,530,426
Cash flows				
Premiums received	189,467,828	0	0	189,467,828
Claims and other insurance service expenses paid, including investment components	0	0	-282,152,763	-282,152,763
Insurance acquisition cash flows	-6,986,289	0	0	-6,986,289
Total cash flows	182,481,539	0	-282,152,763	-99,671,224
Transfer to other items in the statement of financial position				
Closing assets	0	0	0	0
Closing liabilities	2,428,778,227	27,421,558	13,301,826	2,469,501,610
Net closing balance	2,428,778,227	27,421,558	13,301,826	2,469,501,610



31/12/2024	Liabilities for remaining coverage		Liabilities for incurred claims	Total
	excluding loss component	loss component		
Opening assets	0	0	0	0
Opening liabilities	2,428,778,227	27,421,558	13,301,826	2,469,501,610
Net opening balance	2,428,778,227	27,421,558	13,301,826	2,469,501,610
Changes in the statement of profit or loss and OCI				
Contracts under full retrospective transition	-1,466,269	0	0	-1,466,269
Contracts under fair value transition	-1,404,701	0	0	-1,404,701
Other contracts	-9,102,280	0	0	-9,102,280
Insurance revenue	-11,973,250	0	0	-11,973,250
Insurance service expenses				
Incurred claims and other insurance service expenses	3,386,167	0	-115,548,870	-112,162,703
Amortisation of insurance acquisition cash flows	1,997,883	0	0	1,997,883
Losses and reversals of losses on onerous contracts	0	10,852,604	0	10,852,604
Adjustments to liabilities for incurred claims	0	0	141,504,313	141,504,313
Insurance service expenses	5,384,050	10,852,604	25,955,443	42,192,098
Investment components and premium refunds	-175,952,681	0	175,952,681	0
Insurance service result	-182,541,881	10,852,604	201,908,124	30,218,847
Net finance expenses from insurance contracts	129,552,414	1,934,470	125,137	131,612,021
Total changes in the statement of profit or loss and OCI	-52,989,467	12,787,074	202,033,261	161,830,868
Cash flows				
Premiums received	211,125,814	0	0	211,125,814
Claims and other insurance service expenses paid, including investment components	0	0	-209,345,066	-209,345,066
Insurance acquisition cash flows	-6,451,093	0	0	-6,451,093
Total cash flows	204,674,721	0	-209,345,066	-4,670,344
Transfer to other items in the statement of financial position				
Closing assets	0	0	0	0
Closing liabilities	2,580,464,993	40,208,632	5,990,021	2,626,663,646
Net closing balance	2,580,463,481	40,208,632	5,990,021	2,626,662,135



In the Life savings segment, insurance revenue during 2024 decreased to EUR 11.9 million from EUR 14.1 million in 2023. The release of expected cash flows for insurance expenses and risk adjustment for non-financial risks is allocated to the recovery of the incurred loss component to a greater extent in 2024, resulting in less release being allocated to insurance revenue.

During 2024, we recorded an increase in the estimate of future obligations mainly due to an increase in the impact of operating expenses and expected future profit sharing. This caused an increase in the loss component with an impact on the statement of profit or loss of EUR 10.9 million.

Insurance finance expenses over 2024 amounted to EUR 131.6 million, to the Company's detriment. We identify the following concurrent movements underlying this:

- a cost as a result of unwinding of discount rate (locked in) on the CSM of EUR 0.9 million;
- a discount unwind based on the current discount curve at the beginning of the period of EUR 73.0 million;
- an impact of change in the guaranteed interest rate on savings insurance, allocated to financial risk, of EUR 27 million;
- a decrease in the discount curve at the end of the period compared to the beginning of the period representing EUR 30.7 million.

Life reinsurance

The analysis per component for the Life reinsurance segment consists of:



31/12/2023	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	CSM			Subtotal	Total
			Contracts under full retrospective transition approach	Contracts under fair value transition approach	Other contracts		
Opening assets	-8,672,154	-10,652,169	4,490,602	0	0	4,490,602	-14,833,722
Opening liabilities	15,939,083	-1,087,347	-899,652	0	0	-899,652	13,952,083
Net opening balance	7,266,929	-11,739,517	3,590,949	0	0	3,590,949	-881,639
Changes in the statement of profit or loss and OCI							
Changes that relate to current services							
CSM recognised for services provided	0	0	1,009,278	0	0	1,009,278	1,009,278
Change in risk adjustment for non-financial risks expired	0	649,064	0	0	0	0	649,064
Experience adjustments	1,202,760	0	0	0	0	0	1,202,760
Changes that relate to future services							
Contracts initially recognised in the year	0	0	0	0	0	0	0
Changes in recoveries of losses of onerous underlying contracts that adjust the CSM	0		-3,324,417	0	0	-3,324,417	-3,324,417
Changes in estimates that adjust the CSM	-13,786,904	19,534,293	-5,747,390	0	0	-5,747,390	0
Changes in estimates that result in losses and reversals of losses and reversals of losses on onerous contracts	16,963,914	-19,157,688	0	0	0	0	-2,193,774
Changes that relate to past services							
Adjustments to liabilities for incurred claims	-1,639,588	0	0	0	0	0	-1,639,588
Effect on changes in non-performance risk of reinsurers	11,120	0	0	0	0	0	11,120
Insurance service result	2,751,303	1,025,669	-8,062,529	0	0	-8,062,529	-4,285,557
Net finance expenses from insurance contracts	-89,466	0	6,608	0	0	6,608	-82,857
Total changes in the statement of profit or loss and OCI	2,661,837	1,025,669	-8,055,920	0	0	-8,055,920	-4,368,414
Cash flows	-475,368	0	0	0	0	0	-475,368
Closing assets	-6,050,292	-10,713,848	-4,464,971	0	0	-4,464,971	-21,229,110
Closing liabilities	15,503,690	0	0	0	0	0	15,503,690
Net closing balance	9,453,398	-10,713,848	-4,464,971	0	0	-4,464,971	-5,725,421



31/12/2024	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	CSM			Subtotal	Total
			Contracts under full retrospective transition approach	Contracts under fair value transition approach	Other contracts		
Opening assets	-6,050,292	-10,713,848	-4,464,971	0	0	-4,464,971	-21,229,110
Opening liabilities	15,503,690	0	0	0	0	0	15,503,690
Net opening balance	9,453,398	-10,713,848	-4,464,971	0	0	-4,464,971	-5,725,421
Changes in the statement of profit or loss and OCI							
Changes that relate to current services							
CSM recognised for services provided	0	0	1,324,610	0	0	1,324,610	1,324,610
Change in risk adjustment for non-financial risks expired	0	683,683	0	0	0	0	683,683
Experience adjustments	585,150	0	0	0	0	0	585,150
Changes that relate to future services							
Contracts initially recognised in the year	0	0	0	0	0	0	0
Changes in recoveries of losses of onerous underlying contracts that adjust the CSM	0		-1,897,560	0	0	-1,897,560	-1,897,560
Changes in estimates that adjust the CSM	13,931,763	-12,013,523	-1,918,240	0	0	-1,918,240	0
Changes in estimates that result in losses and reversals of losses and reversals of losses on onerous contracts	-11,389,438	10,557,033	0	0	0	0	-832,405
Changes that relate to past services							
Adjustments to liabilities for incurred claims	-1,314,749	0	0	0	0	0	-1,314,749
Effect on changes in non-performance risk of reinsurers	245,784	0	0	0	0	0	245,784
Insurance service result	2,058,510	-772,807	-2,491,190	0	0	-2,491,190	-1,205,487
Net finance expenses from insurance contracts	-24,591	1,944,525	-9,812	0	0	-9,812	1,910,123
Total changes in the statement of profit or loss and OCI	2,033,919	1,171,718	-2,501,002	0	0	-2,501,002	704,636
Cash flows	-523,802	0	0	0	0	0	-523,802
Closing assets	-5,852,747	-9,542,129	-6,965,973	0	0	-6,965,973	-22,360,849
Closing liabilities	16,816,263	0	0	0	0	0	16,816,263
Net closing balance	10,963,516	-9,542,129	-6,965,973	0	0	-6,965,973	-5,544,586



The analysis per remaining coverage and incurred claims for the Life reinsurance segment consists of:

31/12/2023	Liabilities for remaining coverage		Liabilities for incurred claims	Total
	excluding loss component	loss component		
Opening assets	-1,718,256	0	-13,115,466	-14,833,722
Opening liabilities	285,090	0	13,666,994	13,952,083
Net opening balance	-1,433,167	0	551,528	-881,639
Changes in the statement of profit or loss and OCI				
Allocation of reinsurance contracts paid	14,585,810	0	0	14,585,810
Recoveries of incurred claims and other reinsurance service expenses	0	0	-17,249,017	-17,249,017
Recoveries and reversals of recoveries of losses on onerous underlying contracts	0	6,118	0	6,118
Adjustments to assets for incurred claims	0	0	-1,639,588	-1,639,588
	14,585,810	6,118	-18,888,605	-4,296,677
Investment components and premium refunds	0	0	0	0
Effect of changes in non-performing risk of reinsurers	11,120	0	0	11,120
Net expenses from reinsurance contracts	14,596,930	6,118	-18,888,605	-4,285,557
Net finance expenses from insurance contracts	-76,740	-6,118	0	-82,857
Total changes in the statement of profit or loss and OCI	14,520,191	0	-18,888,605	-4,368,414
Cash flows				
Premiums paid	-19,561,081	0	0	-19,561,081
Amounts received	0	0	19,085,713	19,085,713
Total cash flows	-19,561,081	0	19,085,713	-475,368
Closing assets	-6,474,057	0	-14,755,053	-21,229,110
Closing liabilities	0	0	15,503,690	15,503,690
Net closing balance	-6,474,057	0	748,637	-5,725,420



31/12/2024	Liabilities for remaining coverage		Liabilities for incurred claims	Total
	excluding loss component	loss component		
Opening assets	-6,474,057	0	-14,755,053	-21,229,110
Opening liabilities	0	0	15,503,690	15,503,690
Net opening balance	-6,474,057	0	748,637	-5,725,420
Changes in the statement of profit or loss and OCI				
Allocation of reinsurance contracts paid	19,695,073	0	0	19,695,073
Recoveries of incurred claims and other reinsurance service expenses	0	0	-19,835,764	-19,835,764
Recoveries and reversals of recoveries of losses on onerous underlying contracts	0	4,170	0	4,170
Adjustments to assets for incurred claims	0	0	-1,314,749	-1,314,749
	19,695,073	4,170	-21,150,514	-1,451,271
Investment components and premium refunds	0	0	0	0
Effect of changes in non-performing risk of reinsurers	245,784	0	0	245,784
Net expenses from reinsurance contracts	19,940,857	4,170	-21,150,514	-1,205,487
Net finance expenses from insurance contracts	1,914,293	-4,170	0	1,910,123
Total changes in the statement of profit or loss and OCI	21,855,150	0	-21,150,514	704,636
Cash flows				
Premiums paid	-21,672,140	0	0	-21,672,140
Amounts received	0	0	21,148,338	21,148,338
Total cash flows	-21,672,140	0	21,148,338	-523,802
Closing assets	-6,291,047	0	-16,069,803	-22,360,849
Closing liabilities	0	0	16,816,263	16,816,263
Net closing balance	-6,291,047	0	746,461	-5,544,586

The costs with regard to the setup of the reinsurance programme are recognised under net costs under reinsurance contracts (reinsurance service expense). These are amounts owed to the reinsurance broker.



Non life

The analysis per remaining coverage and incurred claims for the Non-life segment consists of:

31/12/2023	Liabilities for remaining coverage	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	Total
Opening assets	0	0	0	0
Opening liabilities	44,844,604	100,264,506	14,667,806	159,776,916
Net opening balance	44,844,604	100,264,506	14,667,806	159,776,916
Changes in the statement of profit or loss and OCI				
Insurance revenue	-141,182,192	0	0	-141,182,192
Insurance service expenses				
Incurred claims and other insurance service expenses	-455,760	87,649,104	4,932,540	92,125,884
Amortisation of insurance acquisition cash flows	0	35,647,867	0	35,647,867
Adjustments to liabilities for incurred claims	0	-14,070,114	-5,414,090	-19,484,204
Insurance service expenses	-455,760	109,226,856	-481,550	108,289,547
Insurance service result	-141,637,952	109,226,856	-481,550	-32,892,645
Net finance expenses from insurance contracts	0	2,420,265	0	2,420,265
Total changes in the statement of profit or loss and OCI	-141,637,952	111,647,121	-481,550	-30,472,380
Cash flows				
Premiums received	145,088,870	0	0	145,088,870
Claims and other insurance service expenses paid, including investment components	0	-77,895,639	0	-77,895,639
Insurance acquisition cash flows	0	-35,647,867	0	-35,647,867
Total cash flows	145,088,870	-113,543,506	0	31,545,364
Closing assets	0	0	0	0
Closing liabilities	48,295,522	98,368,122	14,186,256	160,849,900
Net closing balance	48,295,522	98,368,122	14,186,256	160,849,900



31/12/2024	Liabilities for remaining coverage	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	Total
Opening assets	0	0	0	0
Opening liabilities	48,295,522	98,368,122	14,186,256	160,849,900
Net opening balance	48,295,522	98,368,122	14,186,256	160,849,900
Changes in the statement of profit or loss and OCI				
Insurance revenue	-153,714,104	0	0	-153,714,104
Insurance service expenses				
Incurred claims and other insurance service expenses	-1,061,770	93,412,270	4,620,559	96,971,059
Amortisation of insurance acquisition cash flows	0	41,034,586	0	41,034,586
Adjustments to liabilities for incurred claims	0	-2,826,228	-6,208,211	-9,034,440
Insurance service expenses	-1,061,770	131,620,628	-1,587,652	128,971,206
Insurance service result	-154,775,874	131,620,628	-1,587,652	-24,742,899
Net finance expenses from insurance contracts	0	3,119,534	-46,416	3,073,119
Total changes in the statement of profit or loss and OCI	-154,775,874	134,740,162	-1,634,068	-21,669,780
Cash flows				
Premiums received	156,405,340			156,405,340
Claims and other insurance service expenses paid, including investment components	0	-92,486,972	0	-92,486,972
Insurance acquisition cash flows	0	-41,034,586	0	-41,034,586
Total cash flows	156,405,340	-133,521,557	0	22,883,782
Closing assets	0	0	0	0
Closing liabilities	49,924,989	99,586,726	12,552,188	162,063,903
Net closing balance	49,924,989	99,586,726	12,552,188	162,063,903

The increase in the liabilities for remaining coverage and the insurance revenue in 2024 is the result of further growth in the fire, family and motor insurance portfolio. The premiums received have grown by EUR 10.9 million.

In 2024, the fire insurance policies portfolio grew by 3.6%. Thanks to the combined offering of Fire and Family insurance through the “Verzekerd Wonen Plus” policy, the family policies have also continued to grow, with an increase of 5.0%. The Motor Insurance portfolio rose by 2.4%.

In terms of liabilities for incurred claims for the Non-life segment, a slight decrease in fulfilment cash flows can be observed, from EUR 112.6 million on 31 December 2023 to EUR 112.1 million on 31 December 2024. This is mainly due to a decrease in the risk adjustment for non-financial risks, which fell from EUR 14.2 million to EUR 13.0 million. The decrease in the risk adjustment is offset by the impact of the time value of money, which decreased compared to the previous year (EUR -4.3 million on 31 December 2024 compared to EUR -5.1 million on 31 December 2023) due to a fall in the discount curve. Future cash flows amounted to EUR 103.4 million on 31 December 2024 and remained stable compared to the previous year (EUR 103.5 million).



On 31 December 2024, there was a loss component of EUR 0.4 million on the non-life contracts in the Comprehensive and General Liability Legal Assistance portfolios. Liabilities for remaining coverage for both portfolios amounted to EUR 10.0 million. In 2023, the loss component amounted to EUR 1.5 million on the Comprehensive, Fire, and General Liability Legal Assistance portfolios. Liabilities for remaining coverage for these portfolios amounted to EUR 28.5 million.

Non life reinsurance

The analysis per remaining coverage and incurred claims for the Non-life reinsurance segment consists of:

31/12/2023	Liabilities for remaining coverage	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	Total
Opening assets	0	-5,428,868	-943,673	-6,372,541
Opening liabilities	0	0	0	0
Net opening balance	0	-5,428,868	-943,673	-6,372,541
Changes in the statement of profit or loss and OCI				
Allocation of reinsurance contracts paid	6,042,659	0	0	6,042,659
Amounts recoverable from reinsurers	0	0	0	0
Recoveries of incurred claims and other reinsurance service expenses	0	0	0	0
Adjustments to assets for incurred claims	0	-489,489	53,760	-435,729
	6,042,659	-489,489	53,760	5,606,930
Effect of changes in non-performing risk of reinsurers	0	-20	0	-20
Net expenses from reinsurance contracts	6,042,659	-489,509	53,760	5,606,910
Net finance expenses from insurance contracts	0	-16,690	0	-16,690
Total changes in the statement of profit or loss and OCI	6,042,659	-506,199	53,760	5,590,220
Cash flows				
Premiums paid	-6,042,659	0	0	-6,042,659
Amounts received	0	928,411	0	928,411
Total cash flows	-6,042,659	928,411	0	-5,114,248
Closing assets	0	-5,140,281	-889,913	-6,030,194
Closing liabilities	0	133,625	0	133,625
Net closing balance	0	-5,006,656	-889,913	-5,896,569



31/12/2024	Liabilities for remaining coverage	Estimate of present value of future cash flows	Risk adjustment for non-financial risks	Total
Opening assets	0	-5,140,281	-889,913	-6,030,194
Opening liabilities	0	133,625	0	133,625
Net opening balance	0	-5,006,656	-889,913	-5,896,569
Changes in the statement of profit or loss and OCI				
Allocation of reinsurance contracts paid	7,161,591	0	0	7,161,591
Amounts recoverable from reinsurers	0	0	0	0
Recoveries of incurred claims and other reinsurance service expenses	0	-41,387	-4,077	-45,464
Adjustments to assets for incurred claims	0	789,645	432,795	1,222,441
	7,161,591	748,258	428,719	8,338,567
Effect of changes in non-performing risk of reinsurers	0	54	0	54
Net expenses from reinsurance contracts	7,161,591	748,312	428,719	8,338,622
Net finance expenses from insurance contracts	0	-154,790	10,772	-144,018
Total changes in the statement of profit or loss and OCI	7,161,591	593,522	439,491	8,194,604
Cash flows				
Premiums paid	-7,161,591	0	0	-7,161,591
Amounts received	0	535,035	0	535,035
Total cash flows	-7,161,591	535,035	0	-6,626,556
Closing assets	0	-4,449,255	-450,422	-4,899,677
Closing liabilities	0	571,156	0	571,156
Net closing balance	0	-3,878,099	-450,422	-4,328,521

The costs with regard to the setup of the reinsurance programme are recognised under net costs under reinsurance contracts (reinsurance service expense). These are amounts owed to the reinsurance broker.

Losses at initial recognition

The following tables give a summary of the effect on the valuation components as a result of the initial recognition of insurance and reinsurance contracts that are not measured according to the PAA for the Life risk segment:



31/12/2023 Life risk	Profitable contracts issued	Onerous contracts issued	Total
Estimate of present value of cash outflows	30,707,541	17,010,118	47,717,659
Estimate of present value of cash inflows	-38,151,646	-14,953,329	-53,104,975
Risk adjustment for non-financial risks	3,693,388	1,267,628	4,961,015
Contractual service margin (CSM)	3,750,717	0	3,750,717
Losses recognised at initial recognition		3,324,417	

31/12/2024 Life risk	Profitable contracts issued	Onerous contracts issued	Total
Estimate of present value of cash outflows	23,828,057	29,215,339	53,043,396
Estimate of present value of cash inflows	-26,966,694	-30,364,879	-57,331,574
Risk adjustment for non-financial risks	2,104,040	3,047,100	5,151,140
Contractual service margin (CSM)	1,034,597	0	1,034,597
Losses recognised at initial recognition		1,897,560	

The following tables give a summary of the effect on the valuation components as a result of the initial recognition of insurance and reinsurance contracts that are not measured according to the PAA for the Life savings segment:

31/12/2023 Life savings	Profitable contracts issued	Onerous contracts issued	Total
Estimate of present value of cash outflows	0	281,078,703	281,078,703
Estimate of present value of cash inflows	0	-278,271,295	-278,271,295
Risk adjustment for non-financial risks	0	3,200,910	3,200,910
Contractual service margin (CSM)	0	0	0
Losses recognised at initial recognition		6,008,318	

31/12/2024 Life savings	Profitable contracts issued	Onerous contracts issued	Total
Estimate of present value of cash outflows	0	234,357,569	234,357,569
Estimate of present value of cash inflows	0	-218,775,786	-218,775,786
Risk adjustment for non-financial risks	0	2,756,706	2,756,706
Contractual service margin (CSM)	0	0	0
Losses recognised at initial recognition		18,338,489	



Contractual service margin

The following table shows when the Company expects to recognise the remaining CSM in the statement of profit or loss for contracts that are not measured on the basis of the PAA.

31/12/2023	3 months	3-12 months	12-60 months	> 60 months	Total
Insurance contracts					
Life risk	2,208,878	6,462,700	29,904,224	84,640,514	123,216,317
Life savings	137,034	454,950	3,611,765	29,650,832	33,854,581
	2,345,913	6,917,649	33,515,989	114,291,346	157,070,897
Reinsurance contracts					
Life	-231,778	-642,433	-2,288,101	-1,302,660	-4,464,971
	-231,778	-642,433	-2,288,101	-1,302,660	-4,464,971
31/12/2024	3 months	3-12 months	12-60 months	> 60 months	Total
Insurance contracts					
Life risk	2,591,943	7,641,712	35,387,964	112,617,216	158,238,835
Life savings	131,639	423,282	2,969,819	19,083,472	22,608,212
	2,723,581	8,064,994	38,357,783	131,700,688	180,847,046
Reinsurance contracts					
Life	-300,275	-838,905	-3,157,827	-2,668,966	-6,965,973
	-300,275	-838,905	-3,157,827	-2,668,966	-6,965,973

Cumulative claims

The table below shows how the estimates of cumulative claims for the non-life segment of the Company have developed over time on a gross basis.



31/12/2023		2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	Totaal
Estimates of undiscounted gross cumulative claims	31/12/2014	49,071,571	0	0	0	0	0	0	0	0	0	49,071,571
	31/12/2015	55,560,475	49,651,971	0	0	0	0	0	0	0	0	105,212,445
	31/12/2016	52,827,987	48,988,671	56,385,091	0	0	0	0	0	0	0	158,201,749
	31/12/2017	52,166,099	48,290,586	50,900,850	52,653,875	0	0	0	0	0	0	204,011,411
	31/12/2018	51,313,174	49,054,662	49,490,010	48,955,611	64,244,760	0	0	0	0	0	263,058,218
	31/12/2019	51,070,033	49,991,332	49,200,678	48,234,385	59,846,889	62,536,869	0	0	0	0	320,880,187
	31/12/2020	51,940,574	49,692,246	51,812,128	47,500,401	59,505,928	60,843,977	54,741,189	0	0	0	376,036,442
	31/12/2021	52,745,245	50,401,846	51,576,959	47,196,570	53,994,589	60,918,995	53,990,420	68,161,942	0	0	438,986,566
	31/12/2022	51,948,908	50,100,748	48,896,554	46,386,920	53,435,720	59,161,743	54,396,029	64,597,974	74,222,250	0	503,146,845
	31/12/2023	51,141,155	49,252,995	49,617,192	46,455,587	52,972,119	58,189,347	52,779,882	63,999,433	71,372,901	65,844,395	561,625,006
Cumulative gross claims paid		48,792,743	40,561,399	46,422,472	42,903,607	48,574,055	52,331,100	46,615,327	58,311,818	58,748,248	30,040,379	473,301,148
Gross liabilities		2,348,412	8,691,596	3,194,720	3,551,980	4,398,063	5,858,247	6,164,555	5,687,615	12,624,653	35,804,016	88,323,858
Gross liabilities for accident years before 2014												15,130,885
Effect of discounting												-5,086,621
Net liabilities for incurred claims												98,368,122



31/12/2024		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Totaal
Estimates of undiscounted gross cumulative claims	31/12/2015	493,376,292	0	0	0	0	0	0	0	0	0	493,376,292
	31/12/2016	48,988,671	56,385,091	0	0	0	0	0	0	0	0	105,373,762
	31/12/2017	48,290,586	50,900,850	52,653,875	0	0	0	0	0	0	0	151,845,312
	31/12/2018	49,054,662	49,490,010	48,955,611	64,244,760	0	0	0	0	0	0	211,745,044
	31/12/2019	49,991,332	49,200,678	48,234,385	59,846,889	62,536,869	0	0	0	0	0	269,810,153
	31/12/2020	49,692,246	51,812,128	47,500,401	59,505,928	60,843,977	54,741,189	0	0	0	0	324,095,868
	31/12/2021	50,401,846	51,576,959	47,196,570	53,994,589	60,918,995	53,990,420	68,161,942	0	0	0	386,241,321
	31/12/2022	50,100,748	48,896,554	46,386,920	53,435,720	59,161,743	54,396,029	64,597,974	74,222,250	0	0	451,197,938
	31/12/2023	49,252,995	49,617,192	46,455,587	52,972,119	58,189,347	52,779,882	63,999,433	71,372,901	65,844,395	0	510,483,851
	31/12/2024	47,951,234	49,728,554	45,794,610	51,668,798	58,973,446	52,220,731	64,015,368	72,106,986	63,172,784	76,860,191	582,492,703
Cumulative gross claims paid		40,998,119	46,692,624	43,390,781	49,224,077	53,622,307	47,934,748	59,920,001	62,290,978	51,779,992	38,841,130	494,694,757
Gross liabilities		6,953,114	3,035,930	2,403,829	2,444,721	5,351,139	4,285,983	4,095,368	9,816,008	11,392,793	38,019,061	87,797,946
Gross liabilities for accident years before 2015												15,644,792
Effect of discounting												-3,856,011
Net liabilities for incurred claims												99,586,726



The main estimates and assessments relating to the measurement of the (re)insurance contracts concern the following elements.

Estimates of cash flows

The fulfilment cash flows are the probability-weighted average cash flows consisting of estimates of future cash flows, adjusted to reflect the time value of money and the associated financial risks, and a risk adjustment for non-financial risk.

The main characteristics of the estimates of the future cash flows are:

- They are up to date, reflecting the Company's view of the current circumstances on the report date;
- When estimating future cash flows, the Company takes account of the current expectations of future events that might affect those cash flows;
- In estimating future cash flows the Company will use all reasonable and supporting information available (without excessive costs or efforts) on the reporting date. This information includes both internal and external historical data on claims and other experiences, updated to reflect current expectations of future events;
- They reflect the Company's perspective. No account is taken of expectations of future changes in the legislation that would change or discharge a present obligation or create new obligations under existing contracts until the change has been substantively enacted.

Cash flows within the contract boundaries relate to the fulfilment of the contract. This includes future additional payments in the contract, payments to (or on behalf of) policyholders, insurance acquisition cash flows and other costs incurred to fulfil contracts.

Other costs incurred to fulfil contracts include:

- Claims settlement, maintenance and administrative costs;
- Recurring commission that must be paid on reserves within the contract boundary;
- Costs the Company will incur to provide investment services.

Cash flows are allocated using activity-based cost allocation techniques (cost category and department) and systematic and rational methods that are applied consistently to all costs with similar characteristics.

Contract boundaries

In determining the contract boundaries of (re)insurance contracts, account is taken of the contractual conditions, legislation and regulations, and the usual business practices. Account is also taken of extension options and/or optional covers.

For insurance contracts, cash flows fall within the boundary of the contract if they arise from substantive rights and obligations that exist during the reporting period in which the Company can compel the policyholder to pay premiums or in which the Company has a substantive obligation to provide the policyholder with services. The Company determines that the cash flows relating to future premium payments of extensions of the life savings contracts fall within the contract boundary since full repricing of the insurance contract cannot happen at that time. For the hospitalisation contracts (within life risk) the cash flows relating to future premium payments are also included since they are lifelong contracts and the way in which the Company can index the premiums is tied to legal restrictions. For the non-life contracts, no extensions are included within the contract boundaries. The reason for this is that in the event of extension, the Company can adjust the premium to reflect the reassessed risks for the following year, based on claims experiences and expectations for the respective portfolio. Each extension of the contract is treated as a new contract and is recognised separately from the initial contract when the recognition criteria are met.

For reinsurance contracts, the cash flows fall within the boundary of the contract if they arise from substantive rights and obligations that exist during the reporting period in which the Company is obliged to pay amounts to the reinsurer or has a substantive right to receive services from the reinsurer. A contract boundary of three years is used for the reinsurance contract for life insurance, in accordance with the mutual notice period applicable to this contract. The reinsurance contracts for non-life insurance have a term of one year, which coincides with the calendar year. An annual contract boundary is therefore used for this.



Mortality/life expectancy and surrender for life savings and life risk

The assumptions used for mortality/life expectancy and percentage of maturity are developed on the basis of a mix of national mortality tables, sector developments and recent experiences within the Company. The Company uses the Assuralia mortality tables (2016-2020 for financial year 2023, and 2017-2021 for financial year 2024) adjusted by a pro rata factor based on its own mortality experience.

The following table shows the assumptions relating to surrender percentages (expressed as weighted averages).

	2023	2024
Life savings	0.8%	0.6%
Life risk	1.6%	1.6%

Non-life and life risk claim expectations

For the claims, estimates of future cash flows are determined via so-called triangle extrapolations (chain ladder and variants) for both the indemnities and anticipated claims costs.

The main assumption underlying these techniques is that the Company uses past experience of claims development for the projection of claims development in future reporting periods, and consequently the final claims cost. Qualitative judgements are used in evaluating the extent to which past trends may not continue in the future.

Discount curve



Cash flows are discounted using the risk-free yield curve (euro-swap curve) adjusted to reflect the characteristics of the cash flows and the liquidity characteristics of the contracts (bottom-up approach), without applying convergence to an ultimate forward rate.

To reflect the liquidity characteristics of the insurance contracts, the risk-free yield curves are adjusted with an illiquidity premium. The illiquidity premium is calculated as the difference between the interest rate on AAA covered bonds of European banks and the risk-free interest rate. An additional spread is calculated as the difference between the Euribor 12m interest rate as illiquid interest rate and the interest rate on AAA covered bonds on a one-year term as risk-free interest rate.

The table below shows the point-in-time discount curve on 31 December (at reporting) that is used for all groups of contracts. The previous year's curve is also included in the table below for information purposes.

	1 year	5 year	10 year	15 year	20 year
2023	3.84%	2.86%	2.97%	3.09%	3.08%
2024	2.46%	2.54%	2.86%	2.96%	2.93%

Risk adjustment for non-financial risks

Risk adjustments for non-financial risks are determined to reflect the compensation the Company would require for bearing non-financial risks and its degree of risk aversion. They are determined separately for Life and Non-life contracts and are allocated to groups of contracts on the basis of an analysis of the risk profiles of the groups.

The risk adjustments for non-financial risks are determined on the basis of the following techniques.

- Liabilities for remaining coverage on the basis of a capital cost technique;
- Liabilities for losses suffered of property insurance and reinsurance on the basis of a value at risk technique.

To determine the risk adjustments for non-financial risks in reinsurance contracts, the Company will apply these techniques both gross and net and derive the amount of the risk transferred to the reinsurer as the difference between the two results.

When applying a capital cost technique, the Company will determine the risk correction for non-financial risks by applying a capital cost rate to the amount of the capital required for each future annual report date. The calculations are made on an ultimate basis and the required capital will be determined on the basis of the Solvency II capital requirement for underwriting risks of the respective insurance contracts. The capital cost rate represents the extra compensation investors would require for exposure to the non-financial risk. The capital cost rate applied is 6%. The capital cost rate applied is the same as the one used to calculate the Solvency II risk margin (legally defined).

The risk adjustments for non-financial risks correspond to the following reliability levels.

	2023	2024
Life	78.2%	73.3%
Non-life	86.6%	84.1%

Coverage units

The number of coverage units is the amount of services provided by the contracts in the group, determined by considering for each contract the amount of benefits provided and the expected period of coverage. The coverage unit used depends on what coverage is provided by the specific product. Coverage units will be reviewed and updated at each reporting date.

The Company determines the coverage units as follows:

- For outstanding balance contracts and temporary life cover policies: the insured capital per period
- For savings and investments insurance: the interest paid per period
- For hospitalisation insurance: the premiums received per contract
- For life reinsurance contracts: the outstanding risk capital



Investment component

The Company identifies the investment component of a contract by determining the amount it would be obliged to repay to the policyholder in all scenarios with commercial significance. They cover circumstances in which an insured event occurs or the contract expires or is terminated without an insured event occurring.

Estimates for future cash flows are subject to modelling by group of contracts. For the savings insurance contracts, an investment component is considered. This is equated to the accumulated reserve of the insurance contract in question.

The Company's other contracts do not contain an investment component.

Insurance finance and investment result

The financial and investment result from (re)insurances, in respect of the assets backing these insurance contracts, is made up as follows:

31/12/2023	Life risk	Life savings	Non-life	Life Reinsurance	Non-life Reinsurance	Total
Investment income						
Net interest income	5,152,580	70,458,178	5,357,331			80,968,089
Other investment income	239,656	12,203,471	155,171			12,598,298
Net impairment loss on financial assets	-1,577,359	-1,671,898	-11,551			-3,260,809
Amounts recognised in OCI	9,447,125	58,840,083	14,567,559			82,854,767
Of which debt securities	8,843,264	56,497,921	15,205,795			80,546,980
Of which equities	603,861	2,484,907	-638,236			2,450,532
Total investment income	13,262,002	139,829,835	20,068,509			173,160,346
Insurance finance expenses						
Interest accreted	6,801,846	-78,344,759	-2,469,888	-225,686	137,352	-74,101,134
Effect of changes in interest rates and other financial assumptions	2,763,946	-129,868,660	49,623	308,543	-120,663	-126,867,211
Effect of measuring changes in estimates at current rates and adjusting CSM at rates on initial recognition	0	0	0	0	0	0
Reinsurance finance income	0	0	0	0	0	0
Total (re)insurance finance (expenses)/income	9,565,791	-208,213,419	-2,420,265	82,857	16,690	-200,968,345
Amounts recognised in the statement of profit or loss	1,115,406	-24,397,324	-1,374,365	-24,230	41,101	-24,639,413
Amounts recognised in OCI	8,450,386	-183,816,095	-1,045,900	107,088	-24,411	-176,328,933
Total (re)insurance finance (expenses)/income	9,565,791	-208,213,419	-2,420,265	82,857	16,690	-200,968,345
Net investment result, insurance finance expenses and reinsurance finance income						
Amounts recognised in the statement of profit or loss	4,930,282	53,938,870	4,126,586	-24,230.44	41,100.88	63,012,608
Amounts recognised in OCI	17,897,511	-122,179,710	13,521,659	107,087.85	-24,411.04	-90,677,864
Total net investment result, insurance finance expenses and reinsurance finance income	22,827,793	-68,240,840	17,648,244	82,857	16,690	-27,665,256



31/12/2024	Life risk	Life savings	Non-life	Life Reinsurance	Non-life Reinsurance	Total
Investment income						
Net interest income	7,176,521	74,157,997	7,045,457			88,379,975
Other investment income	240,375	11,023,864	221,625			11,485,864
Net impairment loss on financial assets	-865,127	94,897	382,715			-387,515
Amounts recognised in other comprehensive income	8,640,952	13,013,958	5,766,749			27,421,658
Of which debt securities	8,097,734	29,949,997	5,945,437			43,993,168
Of which equities	543,218	-16,936,039	-178,688			-16,571,510
Total investment income	15,192,721	98,290,715	13,416,546			126,899,982
Insurance finance expenses						
Interest accreted	4,772,513	-73,869,861	-2,573,991	-246,473	144,640	-71,773,172
Effect of changes in interest rates and other financial assumptions	15,516,188	-57,742,160	-499,127	-1,663,650	-622	-44,389,372
Effect of measuring changes in estimates at current rates and adjusting CSM at rates on initial recognition	0	0	0	0	0	0
Reinsurance finance income	0	0	0	0	0	0
Total (re)insurance finance (expenses)/income	20,288,701	-131,612,021	-3,073,119	-1,910,123	144,018	-116,162,544
Amounts recognised in the statement of profit or loss	792,973	-29,388,776	-1,795,704	-18,357	33,328	-30,376,536
Amounts recognised in OCI	19,495,729	-102,223,245	-1,277,415	-1,891,766	110,689	-85,786,008
Total (re)insurance finance (expenses)/income	20,288,701	-131,612,021	-3,073,119	-1,910,123	144,018	-116,162,544
Net investment result, insurance finance expenses and reinsurance finance income						
Amounts recognised in the statement of profit or loss	7,344,742	54,368,305	5,854,094	-18,357.14	33,328.31	67,582,112
Amounts recognised in OCI	28,136,680	-87,689,612	4,489,334	-1,891,765.90	110,689.29	-56,844,674
Total net investment result, insurance finance expenses and reinsurance finance income	35,481,422	-33,321,306	10,343,427	-1,910,123.04	144,017.60	10,737,438



Net interest income is composed as follows:

Net interest income	31/12/2023	31/12/2024
Realised through OCI		
Debt securities	48,244,036	53,421,452
	48,244,036	53,421,452
Realised through P&L		
Amortised cost		
Debt securities	1,309,129	2,789,858
Loans and advances	31,665,574	32,292,730
Other	-496,278	-500,923
Fair value through P&L		
Debt securities	245,628	376,858
Loans and advances	0	0
	32,724,053	34,958,523

Other investment income comprises:

Other investment income	31/12/2023	31/12/2024
Net gains on financial instruments measured at FVTPL		
Equity instruments	3,963,320	4,978,072
Debt securities	261,039	954,520
	4,224,358	5,932,592
Net gains on financial instruments not measured at FVTPL		
Equity instruments	-284,036	12,527
Loans and advances	847,337	-2,080,693
	563,302	-2,068,166
Dividends	7,810,638	7,621,438
Total	12,598,298	11,485,864

The comprehensive income concerns:

Net financial assets impairment loss on financial assets	31/12/2023	31/12/2024
Non-financial assets	0	0
Financial assets at amortised cost		
Debt securities	-15,378	13,619
Loans and advances	-469,006	330,208
	-484,383	343,827
Realised through OCI		
Debt securities	-2,776,425	-731,342
Total	-3,260,809	-387,515



(Re)insurance finance result through OCI	31/12/2023	31/12/2024
Balance at 1 January	399,497,547	267,250,848
Net change in OCI	-176,328,933	-85,786,008
Deferred taxes	44,082,233	21,446,502
Balance at 31 December	267,250,848	202,911,342

Amounts through OCI	31/12/2023	31/12/2024
Balance at 1 January	-47,257,124	-20,768,661
Adjustment due to first-time adoption of IFRS 17 for IFRS 9	-37,002,725	0
Net change in fair value	81,388,561	26,691,923
Net amount reclassified to profit or loss	2,762,684	731,342
Deferred taxes	-20,660,056	-9,266,329
Balance at 31 December	-20,768,661	-2,611,725

19. Other assets

An overview of the other assets can be found in the table below:

	31/12/2023	31/12/2024
Prepaid expenses	12,740,263	15,960,570
Other assets in the context of lending transactions	107,600,278	79,765,975
Other assets in the context of securities transactions	253,730	385,750
Other assets in the context of payment transactions	73,910,156	81,140,649
Suspense accounts	82,935,088	74,951,100
Total other assets	277,439,515	252,204,043

“Other assets in the context of lending transactions” relate to credit advances to notary accounts and to the external services of the Dutch loans.

“Assets in the context of securities transactions” relate to fees receivable for the sale of investment funds of external fund managers (on entry and on portfolio). These fees are settled periodically (monthly).

“Assets in the context of payment transactions” relate to transition accounts for debit and credit cards.

“Suspense accounts” contain amounts awaiting definitive allocation to specific bookkeeping accounts, advances to agents and personnel and current accounts of related companies.



20. Financial liabilities at amortised cost

	31/12/2023	31/12/2024
Deposits from central banks	0	0
Deposits from credit institutions	1,130,294,811	862,766,910
Deposits from other than central banks and credit institutions	42,421,463,560	43,678,738,881
Senior debt securities issued	6,727,324,493	7,461,999,198
Subordinated debt securities issued	0	0
Other financial liabilities	85,899,307	93,093,464
Total	50,364,982,170	52,096,598,454

20.1. Deposits from central banks

The Company has no deposits from central banks.

20.2. Deposits from credit institutions

The deposits from credit institutions are composed as follows:

	31/12/2023	31/12/2024
Deposits from credit institutions	1,130,294,811	862,766,910
Breakdown by product type		
Deposits on demand	7,148,817	4,680,802
Repurchase agreements	0	0
Cash collateral from financial institutions	1,123,145,994	858,086,108
Geographical breakdown		
Belgium	99,836,817	4,680,802
European Monetary Union	1,030,457,994	858,086,108
Rest of the world	0	0
Breakdown by residual term or maturity		
Up to 1 year	1,130,294,811	862,766,910
1 to 5 years	0	0
Effective interest rate at 31/12		
	3.88%	2.91%

The cash collateral from financial institutions consists of cash collateral received for derivative contracts. Due to the evolution of the interest rate curves, the greater part of these contracts have a positive fair value, for which the Company receives (additional) collateral.



20.3. Deposits from other than central banks and credit institutions

Deposits from sources other than central banks credit institutions – essentially from deposits by the Company's retail customers – break down as follows:

	31/12/2023	31/12/2024
Deposits from other than central banks and credit institutions	42,421,463,560	43,678,738,881
Breakdown by product type		
Deposits on demand	6,067,620,094	6,379,967,125
Fixed-term deposits	8,338,474,447	6,841,772,590
Regulated savings deposits	24,766,586,799	27,274,721,363
Mortgage-linked deposits	630,183,927	694,637,509
Cash collateral	109,204,000	56,005,000
Other deposits	2,509,394,293	2,431,635,295
Breakdown by residual term or maturity		
Up to 1 year	6,626,751,260	2,184,498,821
1 to 5 years	1,820,093,014	4,713,268,662
More than 5 years	834,173	10,107
Undefined	33,973,785,113	36,780,961,291
Effective interest rate at 31/12	1.35%	1.27%

The outstanding amounts in current accounts remained high and changed only slightly in 2024. The fixed-term deposits (term accounts) decreased, because customers transferred their funds from the expired one-year term deposit to conventional regulated savings accounts (hence the increase in this line). Further information about interest payments is included under Note 26.

Mortgage-linked deposits contain the undrawn amounts of mortgage loans linked to Dutch mortgage loans that are placed in a blocked account (home construction account) and the mortgage part linked to the endowment mortgage insurance.

The cash collateral consists of cash collateral paid in respect of the current derivative contracts.

“Other deposits” consist mainly of the savings deposits in the Dutch branch and the non-regulated savings accounts in Belgium.



20.4. Senior debt securities issued – bonds

This heading contains the bonds issued by Green Apple, the EMTN issues and the covered bonds.

	31/12/2023	31/12/2024
Senior debt securities issued – bonds	6,752,523,947	7,461,999,198
Green Apple 2017-I NHG	375,479,158	0
Green Apple 2018-I NHG	378,469,993	327,744,153
Green Apple 2019-I NHG	411,049,312	368,050,892
Green Apple 2021-I	528,118,792	488,327,892
EMTN	2,527,217,534	2,066,272,558
Belgian Mortgage Covered Bond Programme	2,506,989,705	4,023,571,680
Certificates of deposits	0	188,032,023
Breakdown by residual term or maturity		
Up to 1 year	1,057,769,152	1,132,035,472
1 to 5 years	4,152,489,181	4,568,913,101
More than 5 years	1,517,066,160	1,786,260,387
Effective interest rate at 31/12	2.32%	2.47%

The Green Apple SPVs serve for the securitisation of Dutch mortgage loans. The A notes of these transactions have been placed with external institutional investors. At the end of 2024, the below securitisation transactions had been issued and were still outstanding:

- SPV Green Apple 2018 I NHG issued on 26 June 2018 for a notional amount (A notes) of EUR 1.0 billion with a contractual maturity date in 2057. This issue was called and repaid in January 2025 – in accordance with the planned modalities.
- SPV Green Apple 2019 I NHG issued on 26 June 2019 for a notional amount (A notes) of EUR 825 billion. The notes run until 2058 with a prepayment option from January 2026.
- SPV Green Apple 2021 I NHG issued on 23 June 2021 for a notional amount (A notes) of EUR 650 billion. The notes run until 2060 with a prepayment option from January 2028.

In 2024, the Green Apple 2017 issue was called and repaid.

Under the EMTN programme, the following transactions are outstanding. On 27 January 2020, a EUR 500 million senior non-preferred bond with a seven-year term was issued, and on 9 October 2020 a EUR 500 million senior non-preferred bond with a six-year term was issued. In 2022 two green senior non-preferred bonds were issued, the first on 8 February 2022 and a second on 29 November 2022 for EUR 600 million and EUR 500 million respectively, with a seven-year and a five-year term. The EUR 500 million senior preferred bond matured in 2024.

As part of the covered bond programme, EUR 1.0 billion of covered bonds were issued in two rounds in 2021, the first on 11 February 2021 for EUR 500 million with a 10-year term, and a second on 8 October 2021 for another EUR 500 million with a 20-year term. During 2022 EUR 500 million was issued in each of two rounds, on 23 February 2022 with a seven-year term and on 20 October 2022 with a four-year term. In 2023, 500 million with a five-year term was issued on 22 June. There were three issues in 2024: an issue of EUR 750 million on 6 February with a 10-year term, an issue of EUR 500 million on 11 March with a 10-year term (it was retained by the Company and is therefore not visible on the balance sheet) and an issue of EUR 750 million on 25 October with a 3-year term.

Further information on the issue programmes can be found at www.argenta.eu.



20.5. Subordinated debt securities issued

The Company has no outstanding subordinated debt securities.

20.6. Other financial liabilities

Other financial liabilities consist of lease liabilities measured and recorded under the IFRS 16 standard, and liabilities linked to investment contracts. They mainly concern the lease liability to Investar for its own office buildings.

The liabilities break down as follows:

	31/12/2023	31/12/2024
Other financial liabilities	85,899,307	93,093,464
Breakdown by type		
Leasing	85,848,309	93,085,663
Investment contracts linked to insurance contracts	50,998	7,801
Breakdown by residual term or maturity		
Up to 1 year	13,287,532	15,012,029
1 to 5 years	44,125,208	48,978,144
More than 5 years	28,486,566	29,103,291

The item "Investment contracts linked to insurance contracts" consists of the reserves of investment contracts in the Insurance Pool recognised in accordance with IAS 9. These contracts are no longer offered and are gradually expiring.

21. Provisions

The changes in the provisions during the year are:

	Pension liabilities	Current legal disputes	Loan commitments, financial guarantees and other commitments	Other provisions	Total
Closing balance at 31 December 2022	6,457,145	2,140,510	1,338,198	235,555	10,171,408
Additions	0	574,808	0	4,093	578,901
Amounts used	0	-97,395	0	0	-97,395
Unused amounts reversed during the period	0	-88,168	-301,758	0	-389,926
Other	2,368,226	0	0	0	2,368,226
Closing balance at 31 December 2023	8,825,371	2,529,756	1,036,440	239,648	12,631,215
Additions	0	256,337	368,498	5,272	630,107
Amounts used	0	0	0	0	0
Unused amounts reversed during the period	0	-94,834	0	0	-94,834
Other	1,411,273	0	0	0	1,411,273
Closing balance at 31 December 2024	10,236,644	2,691,258	1,404,938	244,921	14,577,761

The provisions for legal disputes and the other provisions are based on the best possible accounting estimates available at year-end, taking account of the opinions of legal and tax advisers. They relate to ongoing legal disputes.

For future obligations and guarantees given, expected credit losses are also recognised in the form of stage 1 and stage 2 impairments. Further information can be found in Note 4.1.3.

The timing of the cash outflows that correspond with these provisions is by definition uncertain, considering the unpredictability of the outcome of and the time to reach a settlement of the dispute.

Note on group insurance

The Company provides an additional company pension scheme for its employees. The Company offers an occupational pension scheme of the defined contribution type for its Belgian employees. These defined contribution schemes are funded solely by the employer through a group insurance, in which the insurer guarantees a minimum return on the premiums paid.

Under Article 24 of the Supplementary Pensions Act of 28 April 2003 (the “WAP/LPC”), the employer is required to guarantee a minimum return on defined contribution schemes as from 2004. The legal minimum guaranteed return which the employer is required to pay in respect of employer contributions was, until 31 December 2015, set at 3.25%. The guaranteed return was amended by the Act of 18 December 2015, with the guaranteed return linked to the yield on the 10-year OLO; with a minimum of 1.75% and a maximum of 3.75%. However, the cumulative contributions up to 31 December 2015 remain subject to the 3.25% guaranteed return until employees leave the Company’s pension scheme (the “horizontal” approach).

Because of the legally imposed minimum guaranteed return, Belgian defined contribution schemes are considered as defined benefit schemes. The contributions to the pension scheme depend on the wage level and seniority.

The Company offers an occupational pension scheme of the defined contribution type for its Dutch employees, financed entirely by the employer. For the defined benefit schemes, the final benefit at retirement date for the employee depends on various elements such as years of service and final remuneration.

A defined contribution occupational pension scheme is offered for employees in Luxembourg. The contribution paid for this plan amounted in 2024 to EUR 236,793.

The pension scheme assets consist of insurance contracts. The main risks to which the Company’s contribution schemes are exposed are interest rate, inflation, life expectancy and legal retirement age. The pension obligations are evaluated at least annually. The sensitivity of the schemes to interest rate and inflation shocks is defined on a regular basis.



Change table	31/12/2023	31/12/2024
Defined benefit obligations at the beginning of the period	68,748,379	78,625,390
Current service cost	5,771,978	6,972,625
Interest expenses	2,679,083	2,749,714
Actuarial gain or loss resulting from changes in demographic assumptions	-682,701	-121,606
Actuarial gain or loss resulting from changes in financial assumptions	3,943,726	-188,948
Experience adjustments	-143,657	2,550,054
Benefits paid	-1,691,418	-2,849,535
Defined benefit obligations at the end of the period	78,625,390	87,737,694
Fair value of plan assets (insurance contracts) at the beginning of the year	62,291,234	69,800,015
Interest income	2,499,938	2,502,268
Employer contributions	9,375,143	9,700,934
Actuarial gain or loss resulting from changes in financial assumptions	4,115,946	-756,785
Experience adjustments	-6,790,828	-895,847
Benefits paid	-1,691,418	-2,849,535
Fair value of plan assets (insurance contracts) at the end of the year	69,800,015	77,501,050
Funded status	-8,825,375	-10,236,644
Asset ceiling	0	0
Net defined benefit obligations	-8,825,375	-10,236,644
Net defined benefit obligations at the beginning of the year	-6,457,145	-8,825,375
(Expenses) and income recognised in the statement of profit or loss	-5,951,123	-7,220,071
Revaluations recognised in equity	-5,792,250	-3,892,132
Employer contributions	9,375,143	9,700,934
Net defined benefit obligations at the end of the year	-8,825,375	-10,236,644
(Expenses) and income recognised in the statement of profit or loss	-5,951,123	-7,220,071
Current service cost	-5,771,978	-6,972,625
Past-service cost	0	0
Interest expenses	-2,679,083	-2,749,714
Interest income	2,499,938	2,502,268
Administrative expenses and taxes	0	0
Revaluations recognised in equity	-5,792,250	-3,892,132
Actuarial gain or loss resulting from changes in demographic assumptions	682,701	121,606
Actuarial gain or loss resulting from changes in financial assumptions	172,220	-567,837
Experience adjustments	-6,647,171	-3,445,901
Asset ceiling	0	0



Additional information about the contracts

	Belgian employees	Dutch employees
Nature of the benefits of the pension plan	Capital on retirement age Death capital in the event of death during active employment	Pension annuity from retirement age (lifelong). Partner annuity in the death of the participant or pensioner of the plan (lifelong). Orphan capital in the event of the death of the participant or pensioner of the plan
Legislative framework	Governed by the Belgian WAP/LPC (supplementary pension law) and included in a set of pension regulations. The National Bank of Belgium (NBB) and the Financial Services and Markets Authority (FSMA) act as supervisors.	Regulated by the Dutch Pensions Act. The Dutch central bank (DNB) and the Dutch Financial Markets Authority (AFM) act as supervisors.
Plan changes	Since 1 May 2011, there has been a defined contribution plan, financed with employer contributions, replacing the previous plan. Since 1 May 2017, the distinction in premium budget between wage scales has been abolished. Transition to new insurer on 1 May 2020, previous plan reduced	Since 1 March 2008, there has been a defined benefit plan, financed with employer's contributions.
Limitations and settlements	Not applicable.	
Active affiliates	1,160	77
Passive affiliates	1,469	145
Estimated contributions 2024	9,088,873	970,992

Assumptions used

The following assumptions were used for the Belgian defined contribution schemes: discount rate 3.48% (3.42% in 2023), inflation rate 3.70% in the first year, then 2.00% annually (4.60% in the first year, then 2.00% annually in 2023), salary increase 1.50% (2.50% in 2023). Assuralia 2011-2015 experience tables were used for mortality tables and, for employee turnover, observed historical data, broken down by age category.

The following assumptions were used for the Dutch defined benefit schemes: discount rate 3.48% (3.42% in 2023), inflation rate 3.70% in the first year, then 2.00% (4.00% in the first year, then 2.00% in 2023), salary increase 1.50% (2.00% in 2023). The AG 2014 projections life table was used for mortality tables and, for employee turnover, observed historical data.



Sensitivity of the gross pension liability

	31/12/2023	31/12/2024
Discount rate	- 100 bp	- 100 bp
Impact on the defined benefit obligations	+19.16%	+19.24%
Impact on the fair value of plan assets (insurance contracts)	+18.51%	+18.44%
Salary increase rate	- 100 bp	- 100 bp
Impact on the defined benefit obligations	-1.40%	-1.91%
Impact on the fair value of plan assets (insurance contracts)	+0.00%	+0.00%

Weighted average term

	31/12/2023	31/12/2024
Average term of the pension obligation (years)	16.3	16.3

22. Other liabilities

The other liabilities break down as follows:

	31/12/2023	31/12/2024
Social security charges	14,612,926	16,177,651
Accrued charges	10,031	0
Accounts payable suppliers	58,496,860	48,120,533
Debts – other group companies	268,802	261,973
Debts – agents	27,291,936	27,406,904
Suspense accounts – lending transactions	38,047,428	38,397,866
Suspense accounts – payment transactions	38,908,057	28,414,914
Suspense accounts – securities transactions	5,851,372	6,309,863
Other taxes	6,476,082	9,658,760
Other	57,799,385	50,718,051
Total	247,762,880	225,466,514

The suspense accounts primarily consist of transactions temporarily recorded on these accounts until their final allocation. The “Other” item consists of suspense accounts relating to trade payables and securitisations.

“Debts – other group companies” includes the current accounts between the non-consolidated subsidiaries of the Group.

The decrease in other is mainly related to the decrease in the balance of the current account of the branch in respect of Quion.



23. Leases

The Company has leases in various asset categories such as buildings and cars. The total leasing cost of low value items (mainly IT equipment and bicycles), for which the exemption option was applied, amounted to EUR 403,885 in 2024.

The table below shows the changes over the past two financial years.

	Right-of-use assets	Lease receivables	Lease liabilities
Opening balance as per 01/01/2023	52,857,152	43,018,581	97,261,489
Additions	1,685,220	6,037,831	7,723,051
Interest expense (liability)/income (receivable)		805,887	1,148,218
Lease payments		-9,295,579	-16,931,418
Depreciation	-7,326,627		
Adjustments due to remeasurements	24,982	-124,992	-3,353,030
Adjustments due to modifications	0	0	0
Derecognition	-3,252,646		
Closing balance as per 31/12/2023	43,988,081	40,441,728	85,848,309

	Right-of-use assets	Lease receivables	Lease liabilities
Opening balance as per 01/01/2024	43,988,081	40,441,728	85,848,310
Additions	15,787,399	14,396,277	30,183,675
Interest expense (liability)/income (receivable)		997,481	1,730,105
Lease payments		-10,073,253	-18,654,573
Depreciation	-8,166,367		
Adjustments due to remeasurements	2,146,398	-3,570,709	-6,021,854
Adjustments due to modifications	0	0	0
Derecognition	-4,597,539		
Closing balance as per 31/12/2024	49,157,972	42,191,524	93,085,663

Interest income related to lease receivables is included under "Interest income on financial assets measured at amortised cost".

The increase in lease liabilities reflects the renewal of leases (branch network) and lease indexations.

Right-of-use assets

The rights of use relate to leases on office buildings for own use, other buildings and cars. The leases that are subleased to the branch managers are recorded as lease receivables and are therefore not part of the overview below.



The details per asset category are shown in the table below:

Right-of-use asset	Depreciation	Acquisition value	Accumulated depreciation	Net carrying amount
Company cars	-1,741,766	6,429,115	-4,967,687	1,461,428
Tangible assets	-1,043,847	6,143,152	-4,427,750	1,715,402
Leased buildings without sublease	-254,905	1,886,016	-737,890	1,148,126
Leased other buildings	-4,286,109	53,636,721	-13,973,598	39,663,983
Total 31/12/2023	-7,326,627	68,095,005	-24,106,924	43,988,081

Right-of-use asset	Depreciation	Acquisition value	Accumulated depreciation	Net carrying amount
Company cars	-2,712,269	12,586,503	-5,184,222	7,402,280
Tangible assets	-423,244	2,990,733	-1,697,073	1,293,661
Leased buildings without sublease	-935,068	5,853,024	-1,462,028	4,390,996
Leased other buildings	-4,095,786	52,909,217	-16,838,182	36,071,035
Total 31/12/2024	-8,166,367	74,339,477	-25,181,505	49,157,972

Lease liabilities

The tables below provide the maturity profile of the lease liabilities:

Lease liabilities (undiscounted)	31/12/2023	31/12/2024
Up to 1 year	14,435,639	17,750,745
1 to 5 years	45,886,319	54,203,766
More than 5 years	29,623,513	32,208,406
Total	89,945,470	104,162,917

Lease liabilities (discounted)	31/12/2023	31/12/2024
Up to 1 year	13,236,535	15,004,228
1 to 5 years	44,125,208	48,978,144
More than 5 years	28,486,566	29,103,291
Total	85,848,309	93,085,663

The average discount rate on the lease liabilities is 2.92% (previous year 3.51%).



Lease receivables

The tables below provide the maturity profile of the lease receivables:

Lease receivables (undiscounted)	31/12/2023	31/12/2024
Up to 1 year	8,614,494	9,053,211
1 to 5 years	27,039,010	27,822,166
More than 5 years	7,575,770	9,227,556
Total	43,229,274	46,102,932

Lease receivables (discounted)	31/12/2023	31/12/2024
Up to 1 year	7,683,812	7,739,798
1 to 5 years	25,588,538	25,871,223
More than 5 years	7,169,378	8,580,502
Total	40,441,728	42,191,523

It relates to the lease receivable of the offices leased by the Company to agents.

Exercise of option clauses – leases

Certain office building leases include extension options that can be exercised by the Company. Based on the estimate by the Company, these extension options are included in the initial estimate of the lease term, given that the Company intends to use the contracts for the maximum contractual term (including extension options). The extension options are exercisable by the Company only and not by the lessors. Most car leases have purchase options, which the Company has no intention of exercising.

In exceptional circumstances that lead to the early termination of a lease agreement, a revaluation will be carried out.

24. Fair value of financial instruments

24.1. Valuation methods and input

The Company defines the fair value as the price that would be received/paid on the sale of an asset or transfer of a liability in an “orderly” transaction between market participants at the time of measurement. The fair value is not the price that would be received on the basis of a forced transaction, a forced sale or a mandatory liquidation.

The fair value is a market-based and not an entity-specific valuation. This means that the assumptions to be used are those that other market participants would use for the measurement of financial instruments, including assumptions about risks. Only the characteristics of the instrument itself are to be taken into consideration: characteristics arising from the entity holding the instrument are therefore left out of the measurement. For determining the fair value of a financial instrument, the Company opts for measurement methods and techniques that are appropriate under the circumstances and for which sufficient data are available to calculate the fair value. The chosen technique must maximise the use of relevant observable inputs and minimise those of non-observable inputs.

The Company recognises value adjustments for counterparty risk on all assets and liabilities that are measured at fair value. CVA (Credit Valuation Adjustment) is an adjustment of the market value of derivative financial instruments to reflect the creditworthiness of the counterparty. This takes into account the current market value, expected future market value and creditworthiness (based on the counterparty's credit default swap spread). A DVA (Debit Valuation Adjustment) is recorded for derivative financial instruments where the counterparty has a risk on the Company.



The valuation methodologies, the valuation hierarchy and positions within the levels, and the fair value calculations both of financial instruments not recognised at fair value and of financial instruments recognised at fair value are examined and validated by the Alco on a quarterly basis.

The Company's valuation hierarchy makes a distinction between the levels below. The fair value level depends on the type of input used for the measurement of financial instruments.

- For determining the fair value of financial instruments, the Company first uses the quoted (unadjusted) prices in an active market (externally available and observable fair values of financial instruments on liquid markets). Only where these prices are not available, the Company uses valuation techniques. The definition of level 1 inputs refers to the term "active market"; this is defined as a market in which transactions in the instrument take place with sufficient frequency and volume so that the price information is available on a continuous basis. Whether the frequency and volume of transactions are sufficient to speak of an active market is a matter of assessment and depends on the specific facts and circumstances of the market for the instrument. The Company uses several sources (Bloomberg and Euroclear, the Company's main clearing and holding counterparties) and assesses liquidity on the basis of price availability and price differences between the different sources. If deviations are determined based on this analysis, an individual detailed analysis is carried out for instrument in question;
- Where the fair value is not available based on quoted prices in an active market, the Company determines the fair value based on observable or non-observable parameters. Level 2 inputs are observable inputs that are either direct or indirect. Direct level 2 inputs are listed prices for similar instruments in active markets, quoted prices for identical or similar instruments in non-active markets and other inputs that are observable for the instrument (e.g. yield curves, implied volatility, credit spreads) that can be used as input for the valuation model. Indirect level 2 inputs are inputs derived from observable market data. The valuation techniques used on the basis of observable parameters are the discounting of future cash flows, and comparisons with the fair value of a similar instrument;
- Level 3 inputs are non-observable inputs. They are based on assumptions used by the Company in the valuation. Examples of non-observable inputs are the historical volatility of a quoted share, and non-observable interest rates derived from observable data, but which are not confirmed by observable data.

When the fair value measurement uses inputs from different levels, the asset or liability is classified according to the lowest level of the inputs concerned (with level 1 as the highest and level 3 as the lowest level).

24.2. Financial instruments not recognised at fair value

The fair values recorded under this heading are mainly obtained on the basis of internal calculations, except for the debt securities that are listed. These can fluctuate on a daily basis owing to the parameters used, such as interest rates, commercial margin, and counterparty creditworthiness. Nor is there any intention to realise the fair value immediately. As a result, this value does not represent the substantial value to the Company on a going concern basis.

Estimating the fair value of financial instruments measured at historical cost requires the use of techniques, models, hypotheses and assumptions.

The calculation of the fair value of financial instruments, where this is not obtained externally, can be summarised as follows:

- The fair value of consumer credits, mortgage loans, term loans and term financial liabilities (fixed-term deposits, retail savings certificates, bonds and subordinated loans and bonds) is determined by discounting contractual cash flows by the discounted cash flow method. The discount rate is based on the risk-free reference rate to which a market-based margin is applied. This includes, among other things, a commercial margin spread, a capital cost and a credit cost. The yield curves are analogous to those used in the sensitivity analysis of interest rate risk (see risk section 5.1). The sensitivity of the market values of the level 3 values is contained in the "economic values" calculation mentioned (in this case with an impact on all levels);
- The fair value of cash, deposits, regulated savings deposits, deposits of a special nature and mortgage-linked deposits is assumed to be equal to the carrying amount, in view of their immediately retrievable or short-term nature;
- For bonds, quoted (unadjusted) prices are used where these are traded on an active market. Where the instruments are deemed less liquid, valuation methods are used (theoretical or modelled prices with price control – level 2, or pricing by third parties for which no benchmark is possible due to a lack of market data – level 3).

The following table presents the carrying amounts and fair values of financial assets and financial liabilities that, in the consolidated balance sheet, are not stated at their fair value.

The table does not include the fair value of non-financial instruments such as property, plant and equipment and other intangible assets that were discussed previously in the respective notes.

	Carrying amount 31/12/2023	Fair value 31/12/2023	Carrying amount 31/12/2024	Fair value 31/12/2024
Cash and cash equivalents	62,600,333	62,600,333	66,244,880	66,244,880
Cash balances at central banks and other demand deposits	2,153,523,163	2,153,523,163	2,390,329,068	2,390,329,068
Financial assets at amortised cost				
Loans to credit institutions	2,056,122	2,056,122	2,124,785	2,124,785
Cash collateral to financial institutions	126,423,820	126,423,820	133,448,898	133,448,898
Loans and advances to other customers				
Consumer loans	427,815,655	422,342,039	451,152,420	449,013,459
Mortgage loans	40,056,309,428	36,817,112,882	42,131,676,233	39,853,192,661
Term loans	1,484,976,649	1,429,910,162	1,418,283,606	1,370,797,467
Advances and overdrafts	3,059,280	3,059,280	5,413,392	5,413,392
Leasing	40,441,728	40,441,728	42,191,523	42,191,523
Debt securities	7,118,153,567	6,895,545,026	7,342,132,726	7,265,592,277
Total financial assets	51,475,359,743	47,953,014,554	53,982,997,531	51,578,348,411
Financial liabilities at amortised cost				
Deposits from central banks	0	0	0	0
Deposits from credit institutions	1,130,294,811	1,130,294,811	862,766,910	862,766,910
Deposits from other than central banks and credit institutions				
Deposits on demand	6,067,620,094	6,067,620,094	6,379,967,125	6,379,967,125
Fixed-term deposits	8,338,474,447	8,379,739,780	6,841,772,590	6,917,805,313
Regulated savings deposits	24,766,586,799	24,766,586,799	27,274,721,363	27,274,721,363
Mortgage-linked deposits	630,183,927	672,943,001	694,637,509	745,896,634
Cash collateral	109,204,000	109,204,000	56,005,000	56,005,000
Other deposits	2,509,394,293	2,509,394,293	2,431,635,295	2,431,635,295
Senior debt securities issued				
Other	6,727,324,493	6,385,641,543	7,461,999,198	7,181,312,731
Other financial liabilities	85,899,307	85,899,307	93,093,464	93,093,464
Total financial liabilities	50,364,982,170	50,107,323,629	52,096,598,454	51,943,203,835

The table below shows the *fair values* of the listed IFRS classifications presented schematically by hierarchy level. The reference figure for 2023 for “Financial liabilities at amortised cost” has been adjusted because of the correction of a presentation error.

A level 2 is assigned by the Company to the very short-term financial instruments – with the carrying amount used as fair value – while a level 3 is assigned to all other calculated fair values.



31/12/2023	Fair value	Level 1	Level 2	Level 3
Cash and cash equivalents	62,600,333	0	62,600,333	0
Cash balances at central banks and other demand deposits	2,153,523,163	0	2,153,523,163	0
Financial assets at amortised cost	45,736,891,059	5,535,760,981	1,525,553,991	38,675,576,086
Loans and advances	38,841,346,033	0	171,980,950	38,669,365,083
Debt securities	6,895,545,026	5,535,760,981	1,353,573,042	6,211,003
Financial liabilities at amortised cost	50,107,323,629	4,677,335,831	34,601,542,351	10,828,445,447

31/12/2024	Fair value	Level 1	Level 2	Level 3
Cash and cash equivalents	66,244,880	0	66,244,880	0
Cash balances at central banks and other demand deposits	2,390,329,068	0	2,390,329,068	0
Financial assets at amortised cost	49,121,774,462	6,077,032,173	1,365,541,730	41,679,200,558
Loans and advances	41,856,182,185	0	183,178,598	41,673,003,587
Debt securities	7,265,592,277	6,077,032,173	1,182,363,133	6,196,971
Financial liabilities at amortised cost	51,943,203,835	5,815,976,182	38,463,525,706	7,663,701,947



Cash and balances at central banks and other demand deposits are measured at level 2 fair values (given the short-term nature).

Loans and advances measured at level 3 fair value relate primarily to mortgage loans to individuals for which Argenta has calculated a market valuation based on a DCF model. Here, certain assumptions are applied with respect to spread and prepayment rate. The spread used includes, among other things, a commercial margin including an add-on to reflect a potential loss of a portion of commercial margin in the valuation, a capital cost and a credit cost. For Dutch mortgages cash flows after interest rate adjustment are not included for the fair value calculation.

The Company periodically monitors the commercial margin and compares it with the observed commercial margin in transactions in the market (in particular, the commercial margin ceded to investors in an RMBS transaction).

“Financial assets at amortised cost” includes the relevant debt securities from the securities portfolio. The relevant fair values are obtained externally.

Financial liabilities measured at amortised cost included in level 2 relate to deposits from credit institutions, demand deposits, regulated savings deposits and other deposits. Given the short-term nature of these liabilities, they are treated as a level 2 (carrying amount equivalent to fair value).

The financial liabilities included in level 3 are the fixed-term deposits. Here a market value is calculated based on a DCF model. The covered bonds and issues under the EMTN programme are included under level 1, as there is sufficient evidence available for the existence of a liquid market for these instruments. Since 2024, RMBS securities issued are also included under level 2.

Overall, the fair value has increased compared to 2023 owing to the slight decrease in the long-term yield curve during 2024. The fall in the risk-free yield curve causes the fair value (of mainly fixed-interest instruments) to rise relatively and consequently also the fair value/carrying amount ratio.

24.3. Financial instruments measured at fair value

The following tables present the fair values of the financial instruments that are already recognised in the balance sheet at their fair value.

The table below provides an overview of the level hierarchy of financial assets and liabilities recognised at fair value.

In determining the fair value, the Company first uses the quoted (unadjusted) prices in an active market. For this the Company uses the same external sources as in previous years, namely Bloomberg and Euroclear. Instruments are classified as level 2 where theoretical or modelled prices are available that can be substantiated by/benchmarked against another source or pricing by third parties. For instruments included in level 3, prices are received from third parties for which the Company does not have a benchmark.

The fair values of financial derivatives are calculated internally using a FINCAD application. In accordance with the European Market Infrastructure Regulation (EMIR), the market values are calculated daily.

Collateral management (margin calls) takes place on a daily basis. The external market values obtained with the margin calls are systematically compared with the internally calculated fair values.

Vanilla derivatives (vanilla IRSs, swaptions and caps) are measured on the basis of yield curves and implicit volatilities observable in the market (level 2 inputs). The fair value of these transactions is therefore considered as level 2.

The table below provides an overview of the level hierarchy of financial assets and liabilities recognised at fair value.

31/12/2023	Total	Level 1	Level 2	Level 3
Assets measured at fair value	9,496,327,073	7,221,770,550	2,264,460,040	10,096,483
Financial assets held for trading	63,051,701		63,051,701	0
Assets related to unit linked insurance contracts (branch 23)	2,995,790,474	2,995,790,474	0	0
Financial assets at fair value through other comprehensive income	4,906,197,652	4,153,994,359	749,839,167	2,364,126
Non-trading financial assets mandatorily at fair value through profit or loss	106,229,924	71,985,717	26,511,850	7,732,357
Derivatives used for hedging	1,425,057,322	0	1,425,057,322	0
Liabilities measured at fair value	3,290,996,188	2,995,790,474	295,205,714	0
Financial liabilities held for trading	52,642,345	0	52,642,345	0
Liabilities measured at fair value with valuation changes through profit and loss	2,995,790,474	2,995,790,474	0	0
Derivatives used for hedging	242,563,369	0	242,563,369	0



31/12/2024	Total	Level 1	Level 2	Level 3
Assets measured at fair value	9,046,996,043	6,945,840,457	2,090,334,745	10,820,841
Financial assets held for trading	28,431,717	0	28,431,717	0
Assets related to unit linked insurance contracts (branch 23)	3,218,139,911	3,218,139,911	0	0
Financial assets at fair value through other comprehensive income	4,516,887,273	3,654,510,611	860,394,747	1,981,916
Non-trading financial assets mandatorily at fair value through profit or loss	107,829,888	73,189,936	25,801,027	8,838,925
Derivatives used for hedging	1,175,707,254	0	1,175,707,254	0
Liabilities measured at fair value	3,557,423,583	3,218,139,911	339,283,672	0
Financial liabilities held for trading	22,912,955	0	22,912,955	0
Liabilities measured at fair value with valuation changes through profit and loss	3,218,139,911	3,218,139,911	0	0
Derivatives used for hedging	316,370,716	0	316,370,716	0

In the portfolio “financial assets at fair value through other comprehensive income”, sporadic changes occur between level 1 and level 2 as a result of changes in the liquidity of the instruments (for example, more providers).

In 2023 there was one change from level 1 to level 2 for the instruments measured at fair value. In 2024, there was one reclassification from level 2 to level 1 (carrying amount EUR 200 million) for the instruments measured at fair value.

The following table provides a reconciliation of level 3 fair values between 1 January 2023 and 31 December 2024.

	Financial assets at fair value through other comprehensive income	Financial assets (mandatorily) at fair value through profit or loss
Opening at 01/01/2023	2,398,292	7,843,989
Purchases and new contracts	0	64,316
Expired instruments	0	0
(Partial) repayments	0	-239,384
Changes to other levels	0	0
Changes from other levels	0	0
Other changes (including value changes)	-34,166	63,436
Closing at 31/12/2023	2,364,126	7,732,357
Purchases and new contracts	0	872,848
Expired instruments	0	0
(Partial) repayments	0	-56,833
Changes to other levels	0	0
Changes from other levels	0	0
Other changes (including value changes)	-382,211	290,553
Closing at 31/12/2024	1,981,915	8,838,925

As can be seen from the table, there is only a limited amount of level 3 market values in the financial instruments involved. The total of the debt securities and equity instruments measured at level 3 fair values was EUR 10,820,840 as of 31 December 2024.



Level changes do not have P&L impact. The delta in market value of the financial instruments at fair value through comprehensive income appear in equity.

The EUR 10,820,840 equity instruments with a level 3 fair value mainly consist of shares of an infrastructure fund, real estate certificates and units of an ESG fund where the Company receives pricing or valuation from third parties.

Note on the credit risk in the market value of derivatives

In line with market practices, a CVA (Credit Valuation Adjustment) and a DVA (Debit Valuation Adjustment) have been taken into account in establishing the market value of derivatives. The combined impact of both elements amounted to EUR 3.3 million on the 2024 valuation as against EUR 7.0 million in 2023, with an impact on the result of EUR -3.7 million in 2024.

25. Derivatives

Besides derivatives embedded in contracts, the Company has three types of derivatives (derived financial instruments) on its balance sheet on 31 December 2023: interest rate options (purchased and sold caps), (purchased) swaptions and swaps.

Under IFRS, derivatives are to be recorded in the trading portfolio, unless a hedging relationship is demonstrated between the asset concerned and a specifically hedged component.



Such a hedge relationship can be considered as effective if, under the influence of market factors such as a change in interest rates, the price fluctuations or cash flows of the financial derivative almost entirely offset the price fluctuations or cash flows of the hedged component.

Owing to the strict IFRS criteria that have to be satisfied to classify these as hedging instruments, they are sometimes classified as derivatives held for trading.

The Company uses hedging transactions that satisfy all the required criteria for IAS 39 hedging transactions as approved by the EU. As a result, the particular hedging instruments are classified as derivatives used for hedging. The framework for recognising *micro hedges* in the portfolio at fair value through other comprehensive income and the framework for the treatment of derivatives as *cash flow hedges* were also embedded in the Company.

In 2023 and 2024 no *offsetting* was undertaken when accounting for the derivatives both on and off the balance sheet. As a result, no disclosures in this respect were made as described in IFRS 7.

Interest rate options

Interest rate options are used as protection against the interest rate risk. These are options where the seller commits to pay the buyer an interest rate difference in exchange for a premium paid by the buyer. The interest rate difference is the difference between the current interest rate and an agreed interest rate for a notional amount.

At the end of 2024 the Company had 2 interest rate caps in its balance sheet with a notional amount of EUR 0.35 billion. These are used in managing the global interest rate risk.

The Company also has securitisation-related caps on its balance sheet. At the end of 2024, it had six securitisation-related caps (back-to-back) on its balance sheet.

Financial assets (unlisted)	Number	Notional	31/12/2023	Number	Notional	31/12/2024
Interest rate options – caps	3	650,000,000	10,261,279	2	350,000,000	5,490,663
Securitisation transactions – caps	4	2,857,860,129	52,790,422	3	1,895,534,695	22,941,054

Financial liabilities (unlisted)	Number	Notional	31/12/2023	Number	Notional	31/12/2024
Interest rate options – caps	0	0	0	0	0	0
Securitisation transactions – caps	4	2,857,860,129	52,642,345	3	1,895,534,695	22,912,955

Although serving to hedge the interest rate risk, under IFRS these 2 caps are treated as instruments held for trading.

The fair values used for the separately presented financial derivatives above were determined solely using measurement techniques based on objectively observable market parameters.

Swaptions

In 2024 there were 20 swaptions in total with a nominal value of EUR 2.54 billion.

A swaption entitles the buyer to conclude a swap after the option period and thus to pay or receive a fixed rate. With a payer swaption, the buyer is entitled to pay fixed interest and receive a floating rate. These swaptions are treated as hedging derivatives (macro hedge) with neutralisation of the delta intrinsic value and with the delta time value in NII.

Interest rate swaps

Interest rate swaps are contractual agreements between two parties in which interest cash flows in the same currency are exchanged. These obligations are calculated on the basis of various interest types. With the majority of interest rate swaps, a net exchange of cash flows takes place. This consists of the difference between the fixed and variable interest payments.

The following table lists all swaps and swaptions recognised at year-end, the hedged items and the IFRS treatment.

31/12/2023				
Number	Notional	Hedge type	Treatment in IFRS	Derivative type
127	18,250,000,000	Interest rate risk on loan portfolio	Macro portfolio fair value hedge	Interest rate swaps
11	836,373,888	Interest rate risk individual debt securities	Micro fair value hedge	Interest rate swaps
4	2,000,000,000	Interest rate risk individual debt securities issued	Micro fair value hedge	Interest rate swaps
8	1,150,000,000	Interest rate risk on loan portfolio	Macro portfolio fair value hedge	Swaptions



31/12/2024				
Number	Notional	Hedge type	Treatment in IFRS	Derivative type
150	21,075,000,000	Interest rate risk on loan portfolio	Macro portfolio fair value hedge	Interest rate swaps
10	582,576,388	Interest rate risk individual debt securities	Micro fair value hedge	Interest rate swaps
3	1,500,000,000	Interest rate risk individual debt securities issued	Micro fair value hedge	Interest rate swaps
20	2,535,000,000	Interest rate risk on loan portfolio	Macro portfolio fair value hedge	Swaptions



Notes to the consolidated statement of profit or loss

26. Net interest income

The breakdown of interest income and expenses by type of interest margin-generating financial instrument can be found in the table below. Interest income and interest expense are accounted for using the effective interest method.

	31/12/2023	31/12/2024
Interest income calculated using the effective interest method	1,405,022,416	1,659,807,361
Financial assets at fair value with recognition of fair value changes through profit or loss	1,303,302	1,741,684
Financial assets at fair value through other comprehensive income	105,322,207	115,860,506
Financial assets at amortised cost – loans and advances	919,183,107	1,035,119,619
Financial assets at amortised cost – debt securities	130,870,498	174,014,644
Derivatives used for hedging	245,160,882	329,886,375
Other assets	2,499,938	2,502,268
Interest income on liabilities	682,482	682,265
Interest expenses	581,089,847	882,352,255
Deposits from central banks and credit institutions	55,464,172	42,574,735
Deposits from other than central banks and credit institutions	312,189,497	586,369,661
Senior debt securities issued	144,031,331	166,866,351
Subordinated debt securities issued	0	0
Lease liabilities	1,148,219	1,730,122
Derivatives used for hedging	65,485,254	82,061,672
Other liabilities	2,679,083	2,749,714
Interest expenses on assets	92,291	0
Net interest income	823,932,569	777,455,106
of which interest income from impaired financial assets	507,381	597,010

Net interest income has decreased in 2024.

Interest income has increased due to a continued positive contribution by the derivatives (positive impact of the hedging carried out on an interest rate rise which continued to take effect) and the increase in the interest income from the mortgage and investment portfolio, where the return on recent production and purchases is higher than that coming at final maturity date. Furthermore, the portfolio of granted loans continues to rise.

Interest expenses, being the funding costs (excluding derivatives), increased due to higher interest rates on deposits and term deposits. In addition, further efforts were made to issue non-retail funding with the existing, but not further extended RMBS bonds and EMTN issues and the additional issuances of covered bonds.



The hedging result continued to develop positively. The hedging – with its associated cost in past years – is now bearing fruit. Because of the high Euribor interest rates there are positive returns on the derivatives portfolio.

27. Dividend income

Dividends received are specified below.

	31/12/2023	31/12/2024
Dividend income	8,249,479	8,029,915
Equity instruments at fair value through other comprehensive income	6,674,572	6,784,942
Equity instruments mandatorily measured at fair value through profit or loss	1,574,907	1,244,973

28. Net fee and commission income

Net fee and commission income increased from EUR 86.8 million to EUR 116.6 million for the 2024 financial year.

	31/12/2023	31/12/2024
Fee and commission income	276,265,913	329,165,284
Securities: buy and sell orders and other	11,779,470	21,173,842
Asset management, including central administrative services for collective investment	209,046,015	241,736,044
Customer funds distributed but not managed	17,071,953	17,355,931
Payment services	29,264,047	40,806,343
Other	9,104,429	8,093,124
Fee and commission expenses	-189,433,426	-212,584,562
Acquisition costs	-143,089,772	-160,902,192
Asset management	-8,725,225	-9,645,426
Custody	-2,070,051	-2,306,005
Payment services	-30,615,671	-34,500,183
Other	-4,932,708	-5,230,756
Net fee and commission income	86,832,488	116,580,722
of which net fee and commission income	87,792,559	118,517,745
of which net fee and commission income allocated to insurance result	-960,071	-1,937,023

In the development of the fee and commission income, we see rising fees on buy and sell orders, a significant increase in the management fee received from the funds (because the underlying portfolio continues to grow year-on-year) and an increase in the income from the payment services.

Under the expenses we see the increased acquisition costs paid to the Company's independent branch managers – which are related to the production figures of these offices – and rising fees for the payment services.



29. Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss

The gains and losses on derecognition of, on the one hand, financial assets at fair value through other comprehensive income and, on the other hand, financial assets at amortised cost, can be presented as follows:

	31/12/2023	31/12/2024
Gains on derecognition		
Debt securities at fair value through other comprehensive income	123,102	2,905,729
Financial assets at amortised cost	0	210,978
Losses on derecognition		
Debt securities at fair value through other comprehensive income	-336,779	-9,705
Financial assets at amortised cost	-86,940	-10,695
Total result on derecognition	-300,617	3,096,306
of which debt securities at fair value through other comprehensive income	-213,677	2,896,024
of which financial assets at amortised cost	-86,940	200,283

The fair values of the category "Financial assets at amortised cost" are given in Note 24. In 2023 and 2024 there were no results on derecognition from financial liabilities (not measured at fair value through profit or loss).

In 2024, the realised results were respectively EUR 2,896,024 for debt securities measured at fair value through other comprehensive income and EUR 200,283 for financial assets at amortised cost.

The sales under the financial assets at amortised cost heading (hold-to-collect business model) are 5 positions with a carrying amount of EUR 59,769,887 that were near maturity at the time of sale.

30. Gains and losses on financial assets and liabilities held for trading

The results of the assets and liabilities held for trading can be shown as follows:

	31/12/2023	31/12/2024
Fair value changes related to caps	-5,626,767	-2,121,663

The result of interest options can be found under the net result. Under the ALM policy, all caps are concluded for the account of the Company.

The gains and losses on caps are the result of the recognition of the relevant instruments at market value on the balance sheet, with changes in market value taken in profit and loss.



31. Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss

This heading groups the gains or losses on assets that are not held for trading purposes but that are required to be recognised at fair value through profit or loss.

This shows the impact on market value of the equity portfolio at fair value through profit and loss and a limited portfolio of securities that did not meet the SPPI tests and were therefore recognised in the balance sheet at market value with impact on profit and loss.

	31/12/2023	31/12/2024
Fair value changes related to debt securities	1,107,030	2,922,591
Fair value changes related to equity instruments	3,963,320	4,978,072

32. Gains or losses from hedge accounting

For derivatives that are part of the fair value hedge transactions undertaken to hedge the interest rate risk of a portfolio of individual securities, the relevant interest is given under net interest income.

Changes in the fair value of these derivatives and changes in fair value arising from the hedged risk of the hedged assets are recognised in the item "Gains and losses from hedge accounting".

	31/12/2023	31/12/2024
Macro fair value hedge		
Fair value changes of the hedged items	799,235,195	353,639,405
Fair value changes of the derivatives used for hedge accounting	-804,739,360	-355,131,245
Micro fair value hedge of individual debt securities		
Fair value changes of the hedged items	30,575,454	15,126,129
Fair value changes of the derivatives used for hedge accounting	-30,697,410	-15,068,516
Micro fair value hedge of individual debt securities issued		
Fair value changes of the hedged items	-63,098,744	-40,880,996
Fair value changes of the derivatives used for hedge accounting	63,090,342	40,646,150
Gains or losses from hedge accounting	-5,634,523	-1,669,073

The gains and losses from hedge accounting are the difference between the changes in the market value of the hedged items and the change in market value of the hedging instruments. This includes the macro hedge (hedging of the interest rate risk of a portfolio) and the micro hedge (hedging of the interest rate risk of individual instruments).



33. Gains or losses on the derecognition of non-financial assets

The table below shows the gains and losses on the derecognition of assets other than assets held for sale.

	31/12/2023	31/12/2024
Gains on property, plant and equipment	78,770	19,348
Gains on investment properties	747	0
Losses on property, plant and equipment	-442,601	-30,269
Losses on investment properties	0	0
Total	-363,084	-10,920

34. Net other operating income

Net other operating income consists of the following elements:

	31/12/2023	31/12/2024
Other operating income		
Rental income from investment properties	0	0
Cost-sharing, group companies	0	0
Agent recuperations	9,944,228	8,623,288
Other	7,564,870	7,157,122
Other operating expenses		
Cost-sharing, group companies	0	0
Other	-1,893,799	-2,011,470
Total	15,615,298	13,768,941
of which net operating income	15,518,988	14,567,000
of which net operating income allocated to insurance result	96,310	-798,059

“Other” under other operating income includes recoveries of administrative costs (file costs) from customers and of rental costs and IT infrastructure cost from agents.



35. Administrative expenses

Staff expenses consist of the following components:

	31/12/2023	31/12/2024
Wages and salaries	97,624,565	107,002,626
Social security charges	22,492,716	25,151,387
Pension expenses	6,883,467	9,372,530
Share-based payments	0	0
Other	5,741,094	4,759,426
Total staff expenses	132,741,843	146,285,968
of which staff expenses	119,918,329	128,427,898
of which staff expenses allocated to insurance result	12,823,514	17,858,070
Average number of employees in FTE	1,103.6	1,170.7

The increase in remuneration reflects the increase in FTEs and the inflation cost of the remuneration. The Company is now actively working on becoming less dependent on external consultants and is recruiting internal staff (resulting in, among other things, the increase in FTEs).



The Company mainly has pension obligations based on defined contribution schemes. The contributions are only paid by the employer. In Belgium such group insurance schemes are required to provide a minimum return.

There are no share-based payments at the Company.

Other administrative expenses include:

	31/12/2023	31/12/2024
Marketing expenses	6,385,912	6,624,238
Professional fees – ICT	71,231,448	53,933,077
Professional fees (including legal and fiscal)	30,085,075	23,844,198
IT expenses	75,160,212	69,503,820
Rental expenses	4,559,067	3,434,817
Other taxes and bank levies	112,020,480	108,843,233
Servicing charges (mortgage loans, ATMs)	22,825,861	24,061,635
Utilities	8,631,709	8,198,346
Supervisor	11,180,174	13,575,607
Postage	3,506,425	5,048,654
Interim labour	1,815,145	1,462,552
Other	27,360,570	28,699,249
Total administrative expenses	374,762,077	347,229,425
of which administrative expenses	336,558,231	313,467,248
of which insurance expenses	38,203,846	33,762,178

The decrease in administrative expenses is the result of focusing on insourcing/filling vacancies, decreasing professional fees (EUR -23.5 million). There is also a general focus on cost control and efficiency, resulting in decreased IT costs (EUR -5.7 million) and a stabilisation of other costs, despite the inflationary environment.

The “Professional fees – ICT” and “IT expenses” items consist mainly of the costs of external ICT employees and/or managed services contracts, application management, storage, maintenance and infrastructure. Investments in digitalisation and projects to renew the application and data infrastructure were continued.

Rental expenses contain additional charges and costs related to rental contracts and leases that are considered to be short-term and/or immaterial.

“Other taxes and bank levies” remains a large part of the administrative expenses and has decreased from EUR 112.0 million to EUR 108.8 million.

The “Other” heading includes expenses for telephony, postage, office supplies, professional contributions and travel expenses. These are cost items that are strictly monitored.

36. Impairments

The changes in impairments can be broken down as follows:

	31/12/2023	31/12/2024
Debt securities at fair value through other comprehensive income	-2,734,914	558,837
Debt securities at amortised cost	-10,056,446	-3,187,245
Loans and advances at amortised cost	-3,231,724	4,054,376
Buildings, land, equipment	0	0
Goodwill	0	0
Impairments	-16,023,084	1,425,967

The tables below show the composition and evolution of the impairments as of 31 December 2023 and 31 December 2024. The impairments on future obligations and guarantees given are explained in Notes 4.1.3 and 21.

In 2023, there is a net negative impact of EUR 16,023,084, of which EUR 12,791,360 for debt securities (EUR 2,734,914 for debt securities measured at fair value through other comprehensive income and EUR 10,056,446 for debt securities measured at amortised cost) and EUR 3,231,724 for loans and advances.

For the financial year 2024, there is a positive impact of EUR 1,425,967, comprising a (net) negative impact of EUR 2,628,408 on debt securities and a positive impact of EUR 4,054,376 on loans and advances.



	01/01/2023	Changes in classification as a result of the initial application of IFRS 17	Changes of balance sheet impairments	31/12/2023	Recoveries in profit or loss	Direct write-offs	Total impact on profit and loss
Debt securities at fair value through other comprehensive income	-4,387,425	-739,218	-2,734,914	-7,861,557	0	0	-2,734,914
Stage 1	-3,094,745	-739,218	-163,778	-3,997,741			-163,778
Stage 2	-1,292,680	0	-2,571,136	-3,863,816			-2,571,136
Stage 3	0	0	0	0	0	0	0
Debt securities at amortised cost	-6,863,544	739,218	-10,056,446	-16,180,772	0	0	-10,056,446
Stage 1	-5,242,425	739,218	-1,142,512	-5,645,719			-1,142,512
Stage 2	-1,621,119	0	-8,913,934	-10,535,053			-8,913,934
Stage 3	0	0	0	0	0	0	0
Loans and advances at amortised cost	-45,535,642	0	-49,863	-45,585,504	1,378,636	-4,560,497	-3,231,724
Stage 1	-5,502,295	0	-945,699	-6,447,994			-945,699
Stage 2	-14,803,845	0	2,230,922	-12,572,923			2,230,922
Stage 3	-25,229,502	0	-1,335,086	-26,564,588	1,378,636	-4,560,497	-4,516,947
of which consumer loans	-4,915,222	0	-286,760	-5,201,982	236,028	-1,809,259	-1,859,992
of which mortgage loans	-18,575,249	0	-1,884,727	-20,459,976	705,523	-1,212,111	-2,391,315
of which term loans	-462,736	0	57,511	-405,226	0	0	57,511
of which advances and overdrafts	-1,276,295	0	778,891	-497,404	437,085	-1,539,127	-323,152
Total	-56,786,611	0	-12,841,223	-69,627,833	1,378,636	-4,560,497	-16,023,084



	01/01/2024	Changes of balance sheet impairments	31/12/2024	Recoveries in profit or loss	Direct write-offs	Total impact on profit and loss
Debt securities at fair value through other comprehensive income	-7,861,557	558,837	-7,302,720	0	0	558,837
Stage 1	-3,997,741	2,346,303	-1,651,438			2,346,303
Stage 2	-3,863,816	-1,787,466	-5,651,282			-1,787,466
Stage 3	0	0	0	0	0	0
Debt securities at amortised cost	-16,180,772	-3,187,245	-19,368,017	0	0	-3,187,245
Stage 1	-5,645,719	2,909,016	-2,736,703			2,909,016
Stage 2	-10,535,053	-6,096,262	-16,631,315			-6,096,262
Stage 3	0	0	0	0	0	0
Loans and advances at amortised cost	-45,585,504	5,915,879	-39,669,626	1,812,771	-3,674,275	4,054,376
Stage 1	-6,447,994	3,556,847	-2,891,147			3,556,847
Stage 2	-12,572,923	-527,071	-13,099,994			-527,071
Stage 3	-26,564,588	2,886,103	-23,678,484	1,812,771	-3,674,275	1,024,600
of which consumer loans	-5,201,982	-593,307	-5,795,289	382,816	-1,076,695	-1,287,186
of which mortgage loans	-20,459,976	3,709,174	-16,750,802	956,957	-1,680,292	2,985,838
of which term loans	-405,226	73,087	-332,139	46,087	0	119,174
of which advances and overdrafts	-497,404	-302,850	-800,255	426,911	-917,288	-793,227
Total	-69,627,833	3,287,471	-66,340,363	1,812,771	-3,674,275	1,425,967

The stage 3 impairments are the individual impairments that have been applied. The detailed change table for impairments on 31 December 2023 and 2024 has been included in the note on credit risk in Note 4.1.3.

Expected credit losses (ECL) on the financial instruments are calculated on the basis of a scenario-weighted model that includes historical and forward-looking information. The ECL figure is calculated as the weighted average of the credit losses in three macroeconomic scenarios.

The ECL is calculated by applying the probability of a borrower defaulting to the expected exposure in the event of default, taking into account the expected loss in the event of default, discounted at the effective interest rate of the instrument and adjusted for the credit's survival chances.

The following approach has been used to calculate the ECL as of 31 December 2024:

- Updating of the forecast of the main forward-looking indicators causing credit losses in the retail and non-retail portfolios. The loss expectations differ for each scenario and cover a soft landing, a hard landing and an external shock respectively.
- The soft landing scenario is based on the macroeconomic projections the central banks (ECB, NBB and DNB) announced in December 2024. The hard landing scenario assumes that significant monetary tightening results in a recession, leading the ECB to cut interest rates again faster and deeper. The 3rd scenario assumes stagflation, where growth stagnates but inflation remains above the ECB target (> 2%) due to deglobalisation. In this scenario, further ECB rate cuts are limited. Both (hard landing and stagflation) are internal scenarios. The assumptions are based on market research, historical analysis and our internal assessment of the prospects for the macroeconomic environment.



- The probability of the scenarios is estimated at 45% for the soft landing, 35% for the hard landing and 20% for the stagflation scenario. The weighting of the different scenarios is adjusted at regular intervals on the basis of the development of the main macroeconomic indicators in combination with our internal assessment of where we are in the economic cycle.

The table below shows the comparison of the main forward-looking indicators for the retail portfolio and the non-retail portfolio according to the different scenarios as of 31 December 2024 compared to 31 December 2023.

31/12/2023							31/12/2024					
Soft landing	2023E	2024E	2025E	2026E	2027E	2028E	2024E	2025E	2026E	2027E	2028E	2029E
Retail												
Unemployment BE (%)	5.6	5.5	5.5	5.6	5.5	5.5	5.6	5.6	5.6	5.7	5.7	5.7
Unemployment NL (%)	3.6	4.0	4.2	3.8	3.8	3.8	3.7	3.9	4.0	4.0	4.0	4.0
House price index BE (% YoY)	0.0	0.0	1.8	1.4	2.0	2.0	0.8	2.9	1.4	1.7	2.0	2.0
House price index NL (% YoY)	-3.3	0.4	2.2	2.0	2.0	2.0	8.9	7.5	4.1	2.0	2.0	2.0
Non-retail												
Eurozone GDP (% YoY)	0.6	0.8	1.5	1.5	1.4	1.3	0.7	1.1	1.4	1.3	1.3	1.3
Eurozone inflation (% YoY)	5.4	2.7	2.1	1.9	2.0	2.0	2.4	2.1	1.9	2.1	2.0	2.0
Eurozone unemployment (%)	6.5	6.6	6.5	6.4	6.3	6.3	6.4	6.5	6.3	6.1	6.3	6.3

31/12/2023							31/12/2024					
Hard landing	2023E	2024E	2025E	2026E	2027E	2028E	2024E	2025E	2026E	2027E	2028E	2029E
Retail												
Unemployment BE (%)	5.6	8.2	8.6	8.2	7.8	7.4	5.6	7.8	7.7	7.2	6.7	6.2
Unemployment NL (%)	3.6	6.0	6.4	6.0	5.6	5.2	3.7	6.0	6.0	5.5	5.0	4.5
House price index BE (% YoY)	0.0	-5.0	1.3	1.6	2.0	2.3	0.8	-2.0	-2.0	1.5	1.5	2.0
House price index NL (% YoY)	-3.3	-10.0	1.3	1.6	2.0	2.3	8.9	-5.0	-5.0	1.5	1.5	2.0
Non-retail												
Eurozone GDP (% YoY)	0.6	-2.0	0.0	0.4	0.9	1.3	0.7	-0.6	0.6	0.4	0.3	0.3
Eurozone inflation (% YoY)	5.4	4.5	1.0	1.3	1.7	2.0	2.4	1.7	1.4	1.5	1.5	1.5
Eurozone unemployment (%)	6.5	8.9	9.3	8.9	8.5	8.1	6.4	8.5	8.3	7.8	7.3	6.8



External shock	31/12/2023						31/12/2024					
	2023E	2024E	2025E	2026E	2027E	2028E	2024E	2025E	2026E	2027E	2028E	2029E
Retail												
Unemployment BE (%)	5.6	7.3	7.0	6.7	6.4	6.1	5.6	6.2	7.2	6.8	6.4	5.7
Unemployment NL (%)	3.6	5.4	5.1	4.8	4.5	4.2	3.7	4.3	5.3	4.8	4.4	4.0
House price index BE (% YoY)	0.0	-2.0	2.3	2.3	2.3	2.3	0.8	-2.0	-2.0	2.0	2.0	2.0
House price index NL (% YoY)	-3.3	-4.0	2.3	2.3	2.3	2.3	8.9	0.0	-5.0	2.0	2.0	2.0
Non-retail												
Eurozone GDP (% YoY)	0.6	-0.5	0.5	0.8	1.0	1.3	0.7	0.4	0.6	1.1	1.3	1.3
Eurozone inflation (% YoY)	5.4	2.5	2.0	2.0	2.0	2.0	2.4	2.7	2.4	2.2	2.0	2.0
Eurozone unemployment (%)	6.5	8.1	7.8	7.5	7.2	6.9	6.4	7.0	8.0	7.5	6.9	6.3

The net impairments for non-retail positions (debt securities and (local) government and business loans under loans and advances at amortised cost) rose in 2024 to EUR 27.7 million, compared to EUR 26.4 million at the beginning of the year, which resulted in a total impact of EUR -1.3 million on the statement of profit or loss.

The increase in impairments was mainly attributable to further rating downgrades to CCC- combined with an LGD increase from 45% to 55% from investment exposure to a property counterparty within stage 2. The impairments are consequently largely due, on the one hand, to rating migrations with regard to stage 2 for EUR -9.5 million and EUR +6.8 million due to changes in the forward-looking indicators (including recalibration) and the weighting of the scenarios with regard to the total portfolio.

Currently, there are no impairments in stage 3 for non-retail positions.

The impact of net impairments on the statement of profit or loss on retail positions for mortgage loans and consumer loans for financial year 2024 amounts to EUR -4.5 million (of which EUR -0.4 million on future commitments and guarantees given that are explained in Note 21). In addition, EUR 3.7 million of loans were permanently written down and EUR 1.8 million of recoveries on written-down receivables were received.

For the Dutch mortgage portfolio, stage 1 and 2 impairments decreased by EUR 2.8 million – with the introduction of a new model. The main reasons for this decrease are:

- Development of macroeconomic figures, with a favourable development of forecast house prices (HPI) and low unemployment rate (EUR +1.0 million).
- Development of the portfolio, including rating improvements, repayments of bridging loans and effective increases in the value of collateral (EUR +1.8 million).

With regard to the stage 3 impairments, these decreased by EUR 0.3 million for Dutch mortgages in the course of 2024. This decrease is mainly due to repayments on existing defaults during 2024, while the inflow and outflow of defaults balance each other out. A limited amount in loans in default were written off.

In the course of 2024, stage 1 and 2 impairments in the Belgian mortgage portfolio increased by EUR 1.1 million. The main cause of this increase is the introduction of a new model, with mainly increased PD (effect of EUR 0.8 million).

Stage 3 impairments decreased by EUR 3.6 million for the Belgian mortgage portfolio in 2024 as a result of the introduction of a new model, which takes into account the effect of the time value of future cash receipts as well as macroeconomic scenarios, particularly the estimated development of house prices. In addition, there were EUR 1.7 million in write-offs of loans in default.



In the LOA portfolio, the stage 3 impairments increased by EUR 0.6 million and stage 1 and 2 impairments fell by EUR 0.6 million. The increase in the stage 3 impairments is mainly explained by the inflow of EUR 2.0 million in 90-day overdue loans. On the other hand, there were EUR 1.1 million in write-offs of loans in default.

In the course of 2024 EUR 0.9 million was written off for the current accounts (debit balances and overdrafts). The impairments in stage 3 increased by EUR 0.3 million in this portfolio. The provisions in stage 1 and 2 increased by EUR 0.8 million because of the introduction of a new model.

Management overlays have been phased out with the introduction of the new models. Thus, only additional allocations to stage 2 remain:

- Additional allocation to stage 2 on account of sensitivity to high energy prices: for the Belgian portfolio the impact is EUR 0.25 million, for the Dutch portfolio the impact is EUR 1.3 million;
- Allocation to stage 2 of non-repaying loans for which there is insufficient recent information to accurately assess affordability at maturity: impact EUR 1.4 million.

These additional allocations to stage 2 are approved by the responsible first-line directors and acted upon in the GRC-FR. No other overlays or additional staging are applied at this time.

The main sensitivity of the stage 1 and 2 impairments for the retail portfolios relates to the HPI (house price index). If house prices were to experience a downward shock of 20%, the stage 1 and 2 provisions for the Belgian mortgage portfolio would increase by EUR 1.6 million and for the Dutch mortgage portfolio by EUR 2.8 million.

The negative scenario, would lead to an increase of the impairments by EUR 0.8 million for the Belgian mortgage portfolio and EUR 1.1 million for the Dutch mortgage portfolio as a result of a growing risk of the projected fall in property values.



We note that the negative scenario for the Dutch portfolio is the hard landing scenario, while for the Belgian portfolio it is the stagflation scenario. In the stagflation scenario, a lower degree of prepayments is assumed, so the future size of the portfolio is larger and thus more losses are projected. The difference in forecasts in terms of the unemployment rate and house prices in Belgium, between the hard landing and stagflation scenarios, is insufficient to compensate for this for the Belgian mortgage portfolio.

The full weighting on the soft landing scenario would lead to a total fall of EUR 1.4 million.

37. Tax expense

The details of current and deferred taxes are shown below:

	31/12/2023	31/12/2024
Current taxes		
Current tax expenses for the financial year	103,179,573	121,161,216
Current tax expenses for prior periods	-310,742	-5,496,633
Deferred taxes		
Deferred taxes relating to fiscal losses and DRD	19,489,639	11,578,983
Deferred taxes for prior periods	-184,523	-44,176
Deferred taxes relating to accounting timing differences	-1,914,232	-1,692,834
Impact of total tax on profits or loss	120,259,714	125,506,557
Reconciliation of statutory and effective tax rate		
Profit or loss before tax	430,288,837	452,611,626
Statutory tax rate	25.00%	25.00%
Income tax calculated using statutory rate	107,572,209	113,152,906
Tax effect of different tax rates in other jurisdictions	868,770	641,735
Impairment on deferred taxes	302,720	0
Tax effect of non-taxable income	-1,825,160	-2,195,395
Tax effect of non-tax-deductible expenses	14,007,712	19,590,061
Prior period taxation	-495,265	-5,540,809
Other differences in statutory taxation	-171,273	-141,940
Total income tax expense	120,259,714	125,506,557
Effective tax rate	27.95%	27.73%

As reflected in the table above, the effective tax rate was 27.95% in 2023 and 27.73% in 2024 compared to the statutory tax rate of 25.00% in Belgium.

Part of the taxable basis is realised in the Netherlands and Luxembourg.

The result in the Netherlands is realised largely by the Company's branch office, whereby the Company provides financing to the branch office and carries out a number of activities (mainly in the areas of general strategy and risk management) for the branch office.

For the allocation of results to the branch office, we refer to the notes included in Note 6 Operating segments and country-by-country reporting.

In 2024, all deferred taxes related to losses carried forward and tax deductions were reversed, as they are used for current taxes.

The prior period taxation consists of adjustments following objections submitted or corrections due to the difference between the tax provision recognised at the end of the financial year and the actual tax return.



The increase in the “Non-tax-deductible expenses” item is the result of the introduction of the limitation to 80% of the deductibility of the annual credit institutions tax (for financial year 2023) and the limitation to 100% for financial years from 2024 onwards (with a delta of EUR 17.4 million).

On 22 December 2021 the European Commission published a directive to guarantee a global minimum level of taxation of multinational Groups and sizable domestic Groups in the Union (Pillar 2). This directive was transposed into Belgian law on 19 December 2023.

Today the Company has an effective tax rate higher than 15% in all the jurisdictions in which it is present. The Company falls under the safe-harbour transitional measures and follows the mandatory temporary exception to account for deferred taxes associated with the implementation of the directive.



Other notes

38. Encumbered assets

By circular 2015/03 the Belgian regulator brought into effect in the Belgian prudential framework the guidelines of the European Banking Authority (EBA) of 27 June 2014 on the disclosure of encumbered and unencumbered assets.

Institutions are required, on an advancing basis, to disclose basic information about the previous twelve months based on median values of at least quarterly data. Below is an overview of the encumbered assets at the Company as reported on 31 December 2023 and 2024, together with the average value for 2024.

	31/12/2023		31/12/2024		Average 2024	
	Nominal value	Fair value	Nominal value	Fair value	Nominal value	Fair value
Debt securities						
Collateral for derivatives (caps and swaps)	563,000,000	550,719,387	535,000,000	517,390,680	563,692,308	543,024,817
Collateral for Bank Card Company	70,450,000	67,326,169	73,650,000	73,218,136	73,157,692	71,588,910
Collateral for TLTRO	0	0	0	0	0	0
Collateral for covered bonds	45,000,000	46,085,039	105,000,000	106,868,438	82,000,000	82,343,807
Collateral for Target2 platform	50,000,000	51,900,875	50,000,000	53,150,700	50,000,000	50,821,457
Collateral for NBB credit lines received	314,193,000	292,333,234	319,193,000	309,637,050	315,500,692	299,339,641
Total collateral given	1,042,643,000	1,008,364,703	1,082,843,000	1,060,265,005	1,084,350,692	1,047,118,632
Debt securities						
Collateral for derivatives (caps and swaps)	0	0	-98,457,712	-103,139,516	-54,567,628	-55,586,895
Total collateral received	0	0	-98,457,712	-103,139,516	-54,567,628	-55,586,895
Loans and advances						



	31/12/2023		31/12/2024		Average 2024	
	Nominal value	Fair value	Nominal value	Fair value	Nominal value	Fair value
Collateral for covered bonds	3,055,863,811		5,534,420,004		4,486,296,751	
Total collateral given	3,055,863,811		5,534,420,004		4,486,296,751	
Cash						
Paid cash (derivative products)		126,423,820		133,448,898		72,696,002
Cash received (derivative products)		-1,232,349,994		-914,091,108		-1,218,920,868
Net collateral received		-1,105,926,174		-780,642,211		-1,146,224,866

At the end of 2024, a nominal EUR 535.0 million was encumbered in respect of derivatives, EUR 73.7 million relating to the use of credit cards by the Company's customers and EUR 105.0 in debt instruments and EUR 5.5 billion for the covered bond issues. Part of the loans encumbered under the covered bond issues relates to the Company's own retained covered bond amounting to EUR 553.4 million.

In addition, EUR 133.4 million of cash was paid and EUR 914.1 million of cash received in respect of collateral management for derivatives. This involves the exchange of collateral (in cash – variation margin) to hedge the credit risk (as a result of the fair value) on derivatives.

The bank has given EUR 50 million of collateral for the Target2 platform. There is also a EUR 319.2 million credit line with the NBB, for which securities will be encumbered as and when this credit line is used.

39. Off-balance sheet liabilities

The Company has issued guarantees against its own financial assets. The reasons and nominal values of the assets involved can be found in the table below.

	31/12/2023	31/12/2024
Collateral received	51,523,180,227	54,773,253,538

The collateral received relates to the collateral received in return for lending (including mortgage registrations and pledged securities).

The financial guarantees granted and received are given below.

	31/12/2023	31/12/2024
Financial guarantees issued	4,566,889	5,264,459
Financial guarantees received	0	0

Finally, there are credit lines granted and received. The credit lines granted relate to notified credit lines and credit offers for retail lending.

The credit lines received relate to the credit lines received from other financial institutions on the Company's accounts with these institutions.

	31/12/2023	31/12/2024
Credit lines granted	1,515,538,739	2,771,181,017
Credit lines received	263,300,000	276,775,000

The Bank Pool has a EUR 276.8 million credit line with the NBB. The increase in credit lines granted and loans in application is volume driven. These are mainly loan applications in the process of approval for the purposes of mortgage lending.

The impairments on future obligations (credit commitments) and guarantees given are explained in Notes 4.1.3 and 21.

Argenta also offers investments to its customers. The table below breaks down the securities in custody broken down into i) funds managed by subsidiaries Argenta Asset Management and Arvestar ii) securities distributed but not managed by Argenta. Argenta has no discretionary management.

	31/12/2023	31/12/2024
Assets under custody	16,145,548,206	18,675,951,198
asset management	15,030,714,710	17,523,227,273
distributed but not managed	1,114,833,496	1,152,723,925



40. Contingent liabilities

The Company is a defendant in a number of disputes within the context of normal business operations.

The Company recognises provisions for such cases when, in the opinion of management and after consultation with its legal advisers, it is probable that the Company will have to make payments, and the payable amount can be reasonably estimated.

These provisions were briefly explained in Note 21 Provisions.

The Company has an uncertain tax position related to the filed (not yet approved) ruling application regarding the distribution of profits between the Company's head office (located in Belgium) and the branch office (in the Netherlands) that was described in Note 6 Operating segments.

For further claims and legal proceedings against the Company of which the management is aware (and for which, in accordance with the principles described above, no provision has been set aside), management believes, after obtaining professional advice, that these claims have limited chance of success, or that the Company can defend itself successfully against them, or that the outcomes of these cases are not expected to result in a significant loss in the statement of profit or loss. The Company is currently not involved in any material disputes.

Overview of abbreviations used

AAM	Argenta Asset Management
ABS	Asset Backed Securities
AE	Asset Encumbrance
AER	Asset Encumbrance Ratio
AFS	Available For Sale
ALCO	Assets and Liability Committee
ALM	Asset Liability Management
Aras	Argenta Assuranties nv
Aspa	Argenta Spaarbank nv
BM	Business Model
BVg	Argenta Bank- en Verzekeringsgroep nv
CBFA	Commissie Bank-, Financie- en Assurantiewezen (Bank, Finance and Insurance Commission)
CBHK	Centraal Bureau voor Hypothecaire Kredieten
CCO	Chief Commercial Officer
CD	Certificates of Deposits
CEO	Chief Executive Officer
CET1	Common Equity Tier 1
CFH	Cash Flow Hedge
CFO	Chief Financial Officer
CGU	Cash Generating Unit
CODM	Chief Operating Decision Maker
COO	Chief Operating Officer
COREP	Common Reporting
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CRA	Credit Risk Analysis
CRD	Capital Requirements Directive
CRO	Chief Risk Officer
CRR	Capital Requirements Regulations
CVA	Credit Valuation Adjustment
DC	Danish Compromise
DCF	Discounted Cash Flow method
DTA	Deferred tax assets
DSTI	Debt Service To Income
DVA	Debit Valuation Adjustment
EAD	Exposures At Default
EBA	European Banking Authority
ECB	European Central Bank



ECL	Expected Credit Losses
ELBE	Expected Loss Best Estimate
EMIR	European Market Infrastructure Regulation
EONIA	Euro OverNight Index Average
EPC	Energy Performance Certificate
ESTR	Euro Short Term Rate
FICOD	Financial Conglomerates Directive
FIRB/AIRB	Foundation Internal Ratings Based/Advanced Internal Rating Based
FVOCI	Fair Value through Other Comprehensive Income
GRC	Group Risk Committee
HTM	Held To Maturity
IAS	International Accounting Standards
IBNR	Incurred But Not Reported
ICAAP	Internal Capital Adequacy Assessment Process
IFRS	International Financial Reporting Standards
ILAAP	Internal Liquidity Adequacy Assessment Process
IO	Investment Consultation
IPT	Individual Pension Commitment
IRB	Internal Ratings Based (AIRB advanced, FIRB foundation)
IRS	Interest Rate Swap
JST	Joint Supervisory Team
Kreco	Credit Risk Committee – retail
KRI	Key Risk Indicator
KRS	Branch Risk Score
LAT	Liability Adequacy Test
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
LRE	Leverage Ratio Exposure
LTI	Loan To Income
LTRO	Long Term Refinancing Operation
MBS	Mortgage Backed Securities
MCR	Minimum Capital Requirements
MREL	Minimum Requirement on own funds & Eligible Liabilities
NFR	Non-Financial Risk
NHG	National Mortgage Guarantee (Netherlands)
NSFR	Net Stable Funding Ratio
OCI	Other Comprehensive Income
OLO	Obligation Linéaire/Lineaire Obligatie/Linear Bond



ORSA	Own Risk & Solvency Assessment
OTC	Over The Counter
PD	Probability of Default
PIT	Point In Time
Prico	Pricing Committee
Proco	Product Committee
RA(S)CI	Responsible Accountable (Supportive) Consulted Informed
RAF	Risk Appetite Framework
RMBS	Residential Mortgage Backed Security
RO	Rating Consultation
ROE	Return On Equity
ROI	Return On Investment
SCR	Solvency Capital Requirements
SFCR	Solvency and Financial Condition Report
SII	Solvency II
SPPI	Solely Payments of Principal and Interest
SREP	Supervisory Review & Evaluation Process
TC	Total Capital
TIM	Treasury & Investment Management
TIS	Treasury and Investment Service
TLTRO	Targeted Longer-Term Refinancing Operations
TREA	Total Risk Exposure Amount
TTC	Through the Cycle
VRC	Insurance Risk Committee
WAP/LPS	Supplementary Pensions Act
WVV	Belgian Companies and Associations Code



FREE TRANSLATION OF THE DUTCH ORIGINAL

LIMITED ASSURANCE REPORT OF THE REGISTERED AUDITOR TO THE GENERAL SHAREHOLDERS' MEETING ON THE CONSOLIDATED SUSTAINABILITY STATEMENT OF ARGENTA BANK- EN VERZEKERINGSGROEP NV FOR THE ACCOUNTING YEAR ENDED ON 31 DECEMBER 2024

We present to you our registered auditor's report in the context of our limited assurance engagement on the consolidated sustainability statement of Argenta Bank-en Verzekeringsgroep NV (the "Company") and its subsidiaries (jointly "the Group"). The consolidated sustainability statement of the Group is included in "Chapter 6 Sustainability Statement" of the "Integrated 2024 annual report" on 31 December 2024 and for the year then ended (hereafter "the consolidated sustainability statement").

We have been appointed by the general meeting d.d. 25 February 2025, following the proposal formulated by the board of directors and following the recommendation by the audit committee and the proposal formulated by the works' council to perform a limited assurance engagement on the consolidated sustainability statement of the Group.

Our mandate will expire on the date of the general meeting which will deliberate on the annual accounts for the year ended 31 December 2026. We have performed our assurance engagement on the consolidated sustainability statement for one year.

Limited assurance conclusion

We have conducted a limited assurance engagement on the consolidated sustainability statement of the Group.

Based on the procedures we have performed and the assurance evidence we have obtained, nothing has come to our attention that causes us to believe that the consolidated sustainability statement of the Group, in all material respects:

- has not been prepared in accordance with the requirements of article 3:32/2 of the Companies' and Associations' Code, including compliance with the applicable *European Sustainability Reporting Standards (ESRS)*;
- is not in accordance with the process (the "Process") carried out by the Group, as disclosed in note "6.1.4 Impact, risks and opportunities(IRO)" to identify the information reported in the consolidated sustainability statement on the basis of ESRS;
- does not comply with the requirements of article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") disclosed in note "6.5 Taxonomy reporting".

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information ("ISAE 3000 (Revised)"), as applicable in Belgium. Our responsibilities under this standard are further described in the "Responsibilities of the registered auditor on the limited assurance engagement on the consolidated sustainability statement" section of our report.

We have complied with all ethical requirements that are relevant to assurance engagements of sustainability statements in Belgium, including those related to independence.

We apply International Standard on Quality Management 1 (ISQM 1), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have obtained from the board of directors and Company officials the explanations and information necessary for performing our limited assurance engagement.

We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Other matter

The scope of our work is limited to our limited assurance engagement regarding the consolidated sustainability information of the Group. Our limited assurance engagement does not extend to information related to the comparative figures included in the consolidated sustainability statement.

Responsibilities of the board of directors relating to the preparation of the consolidated sustainability statement

The board of directors is responsible for designing and implementing a Process and for disclosing this Process in note "6.1.4 Impact, risks and opportunities(IRO)" of the consolidated sustainability statement. This responsibility includes:

- understanding the context in which the activities and business relationships of the Group take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long- term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

The board of directors is further responsible for the preparation of the consolidated sustainability statement, which includes the information established by the Process:

- in accordance with the requirements referred to in article 3:32/2 of the Companies' and Associations' Code, including the applicable European Sustainability Reporting Standards (ESRS);
- in compliance with the requirements of article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") disclosed in note "6.5 Taxonomy reporting".

This responsibility comprises:

- designing, implementing and maintaining such internal control that the board of directors determines is necessary to enable the preparation of the consolidated sustainability statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

The audit committee is responsible for overseeing the Group's sustainability reporting process.

Inherent limitations in preparing the consolidated sustainability statement

In reporting forward-looking information in accordance with ESRS, the board of directors is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected and the deviation from that can be of material importance.

Responsibilities of the registered auditor on the limited assurance engagement on the consolidated sustainability statement

Our responsibility is to plan and perform the assurance engagement with the aim of obtaining a limited level of assurance about whether the consolidated sustainability statement contains no material misstatements, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or errors and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the consolidated sustainability statement.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), as applicable in Belgium, we apply professional judgment and maintain professional scepticism throughout the engagement. The work performed in an engagement aimed at obtaining a limited level of assurance, for which we refer to the section "Summary of work performed," is less in scope than in an engagement aimed at obtaining a reasonable level of assurance. Therefore, we do not express an opinion with a reasonable level of assurance as part of this engagement.

As the forward-looking information in the consolidated sustainability statement and the assumptions on which it is based, are future related, they may be affected by events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different from the assumptions, as the anticipated events frequently do not occur as expected, and the deviation from that can be of material importance. Therefore, our conclusion does not provide assurance that the reported actual outcomes will

correspond with those included in the forward-looking information in the consolidated sustainability statement.

Our responsibilities regarding the consolidated sustainability statement, with respect to the Process, include:

- obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- designing and performing work to evaluate whether the Process is consistent with the description of the Process by the Group, as set out in note “6.1.4 Impact, risks and opportunities(IRO)”.

Our other responsibilities regarding the sustainability statement include:

- acquiring an understanding of the entity's control environment, the relevant processes, and information systems for preparing the sustainability information, but without assessing the design of specific control activities, obtaining supporting information about their implementation, or testing the effective operation of the established internal control measures;
- identifying where material misstatements are likely to arise, whether due to fraud or error, in the consolidated sustainability statement; and
- designing and performing procedures responsive to where material misstatements are likely to arise in the consolidated sustainability statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of work performed

A limited assurance engagement involves performing procedures to obtain evidence about the consolidated sustainability statement. The procedures carried out in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement.

Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing, and extent of procedures selected depend on professional judgment, including the identification of areas where material misstatements are likely to arise in the consolidated sustainability statement, whether due to fraud or errors.

In conducting our limited assurance engagement with respect to the Process, we have:

- obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
 - reviewing the Group's internal documentation relating to its Process.
- evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Group was consistent with the description of the Process set out in note “6.1.4 Impact, risks and opportunities(IRO)”.



In conducting our limited assurance engagement, with respect to the consolidated sustainability statement, we have:

- obtained an understanding of the Group's reporting processes relevant to the preparation of its consolidated sustainability statement by obtaining an understanding of the Group's control environment, processes and information system relevant to the preparation of the consolidated sustainability statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control;
- evaluated whether the information identified by the Process is included in the consolidated sustainability statement;
- evaluated whether the structure and the presentation of the consolidated sustainability statement is in accordance with the ESRS;
- performed inquiries of relevant personnel and analytical procedures on selected information in the consolidated sustainability statement;
- performed substantive assurance procedures on selected information in the consolidated sustainability statement;
- evaluated the methods/assumptions for developing estimates and forward-looking information as described in the section 'Responsibilities of the registered auditor on the limited assurance engagement on the consolidated sustainability statement';
- obtained an understanding of the Group's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the consolidated sustainability statement.

Statement related to independence

Our registered audit firm and our network did not provide services which are incompatible with the limited assurance engagement, and our registered audit firm remained independent of the Group in the course of our mandate.

Diegem, 9 April 2025

PwC Bedrijfsrevisoren BV
Represented by

Jeroen Bockaert*
Bedrijfsrevisor

*Acting on behalf of Jeroen Bockaert BV



Statutory auditor's report to the general meeting of Argenta Bank- en Verzekeringsgroep NV on the consolidated financial statements as of and for the year ended 31 December 2024

FREE TRANSLATION OF UNQUALIFIED STATUTORY AUDITOR'S REPORT ORIGINALLY PREPARED IN DUTCH

In the context of the statutory audit of the consolidated financial statements of Argenta Bank- en Verzekeringsgroep NV ("the Company") and its subsidiaries (jointly "the Group"), we provide you with our statutory auditor's report. This includes our report on the consolidated financial statements and the other legal and regulatory requirements. Our report is one and indivisible.

We were appointed as statutory auditor by the general meeting of 26 April 2024, in accordance with the proposal of the board of directors on the recommendation of the audit committee and as presented by the workers' council. Our mandate will expire on the date of the general meeting deliberating on the annual accounts for the year ended 31 December 2026. We have performed the statutory audit of the consolidated financial statements of the Group for four consecutive financial years.

Report on the consolidated financial statements

Unqualified opinion

We have audited the consolidated financial statements of the Group as of and for the year ended 31 December 2024, prepared in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board, as adopted by the European Union, and with the legal and regulatory requirements applicable in Belgium. These consolidated financial statements comprise the consolidated balance sheet (before profit distribution) as at 31 December 2024, the consolidated statements of profit or loss, comprehensive income, changes in equity and cash flows for the year then ended and notes, comprising material accounting policies and other explanatory information. The total of the consolidated balance sheet (before profit distribution) amounts to EUR 62.674.143.315 and the consolidated statement of profit or loss shows a profit for the year of EUR 327.105.069.

In our opinion, the consolidated financial statements give a true and fair view of the Group's equity and financial position as at 31 December 2024 and of its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board, as adopted by the European Union, and with the legal and regulatory requirements applicable in Belgium.



Basis for our unqualified opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs") as adopted in Belgium. In addition, we have applied the ISAs as issued by the IAASB and applicable for the current accounting year while these have not been adopted in Belgium yet. Our responsibilities under those standards are further described in the "Statutory auditors' responsibility for the audit of the consolidated financial statements" section of our report. We have complied with the ethical requirements that are relevant to our audit of the consolidated financial statements in Belgium, including the independence requirements.

We have obtained from the board of directors and the Company's officials the explanations and information necessary for performing our audit.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Board of directors' responsibilities for the preparation of the consolidated financial statements

The board of directors is responsible for the preparation of these consolidated financial statements that give a true and fair view in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board, as adopted by the European Union, and with the legal and regulatory requirements applicable in Belgium, and for such internal control as board of directors determines, is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the board of directors is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the board of directors either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Statutory auditor's responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance as to whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of the users taken on the basis of these consolidated financial statements.



When performing our audit, we comply with the legal, regulatory and professional requirements applicable to audits of the consolidated financial statements in Belgium. The scope of the statutory audit of the consolidated financial statements does not extend to providing assurance on the future viability of the Group nor on the efficiency or effectivity of how the board of directors has conducted or will conduct the business of the Group. Our responsibilities regarding the going concern basis of accounting applied by the board of directors are described below.

As part of an audit in accordance with ISAs, we exercise professional judgement and maintain professional skepticism throughout the audit. We also perform the following procedures:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- Obtain an understanding of internal controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by board of directors;
- Conclude on the appropriateness of board of directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern;
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation;
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.



We communicate with the board of directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Other legal and regulatory requirements

Responsibilities of the Board of directors

The board of directors is responsible for the preparation and the content of the board of directors' annual report on the consolidated financial statements including the sustainability information, prepared on a voluntary basis.

Statutory auditor's responsibilities

In the context of our engagement and in accordance with the Belgian additional standard which is complementary to the International Standards on Auditing as applicable in Belgium, our responsibility is to verify, in all material respects, the board of directors' annual report on the consolidated financial statements, and to report on this matter.

This responsibility does not include the performance of the assurance engagement on the consolidated sustainability information included in the annual report on the consolidated financial statements, as the Company has appointed another auditor for this assurance engagement.

Aspects concerning the board of directors' annual report on the consolidated financial statements

Based on specific work performed on the board of directors' annual report on the consolidated financial statements, we are of the opinion that this annual report is consistent with the consolidated financial statements for the same period and has been prepared in accordance with article 3:32 of the Companies' and Associations' Code.

In the context of our audit of the consolidated financial statements, we are also responsible for considering, in particular based on the knowledge gained throughout the audit, whether the board of directors' annual report on the consolidated financial statements contains material misstatements, that is information incorrectly stated or misleading. In the context of the procedures carried out, we did not identify any material misstatements that we have to report to you.

The annual report on the consolidated financial statements contains the consolidated sustainability information that is prepared on a voluntary basis and that is the subject of a separate report on the limited assurance with respect to this sustainability information, issued by PwC Bedrijfsrevisoren BV dated 9 April 2025. This section does not cover the assurance on the sustainability information included in the annual report on the consolidated financial statements.



Statutory auditor's report to the general meeting of Argenta Bank- en Verzekeringsgroep NV on the consolidated financial statements as of and for the year ended 31 December 2024

Information about the independence

- Our audit firm and our network have not performed any engagement which is incompatible with the statutory audit of the consolidated accounts and our audit firm remained independent of the Group during the term of our mandate.
- The fees for the additional engagements which are compatible with the statutory audit referred to in article 3:65 of the Companies' and Associations' Code were correctly stated and disclosed in the notes to the consolidated financial statements.

Zaventem, 9 April 2025

KPMG Bedrijfsrevisoren - Réviseurs d'Entreprises
Statutory Auditor
represented by

Kenneth Vermeire
Bedrijfsrevisor / Réviseur d'Entreprises