Argenta Spaarbank

Integrated 2024 annual report

ARGENTA

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

Argenta in 2024

Key figures

Number of customers:

1,83 million

Number of employees:

1,041

Customer satisfaction:

NPS
Net Promotor Score
+54

Net profit:

273 million

Number of branches:

370

Return on equity:

10.0%

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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 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.

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.

Argenta valt in de prijzen

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.

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.

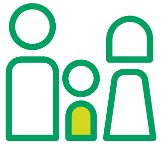
Instalment loans can help our customers deal with unexpected expenses and manage their finances. Our instalment loans offer a flexible and reliable solution tailored to the needs of our customers – whether the funds are to support sustainable mobility, such as buying an electric car, or to meet other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


Savings accounts

Argenta is ready to protect customers against all kinds of risks within the family, home or mobility. The sister company 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

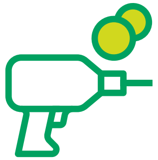

Fire insurance

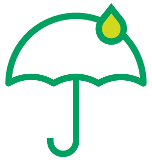

Family insurance


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

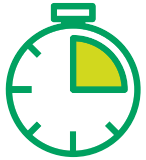

Renovation loan


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.

Freely translated: 'One-off stunts. We don't do that. Going the extra mile for all our customers every day. That's what we do.'


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 senior managers 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.

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.

‘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.

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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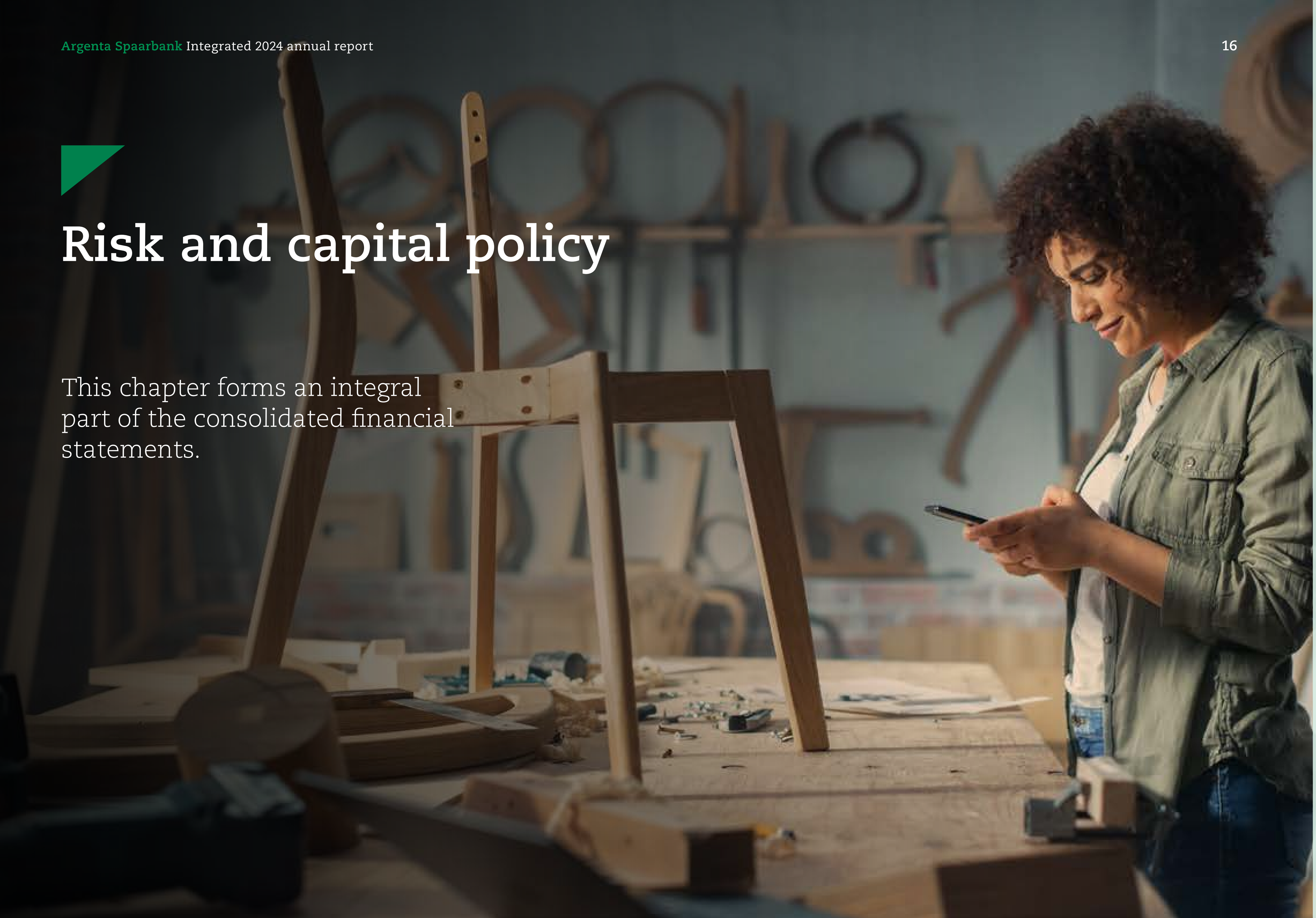

Risk and capital policy

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

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Risk 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-defence 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.

‘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 & Validatie	> Monitors compliance with the statutory, regulatory and ethical rules of integrity and conduct by Argenta and its staff
	• Compliance	> waakt over de naleving van de wettelijke, reglementaire en deontologische integriteits- en gedragsregels door Argenta en zijn medewerkers
	• Actuariële functie	> 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).

The senior managers 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.

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 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.

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.

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).

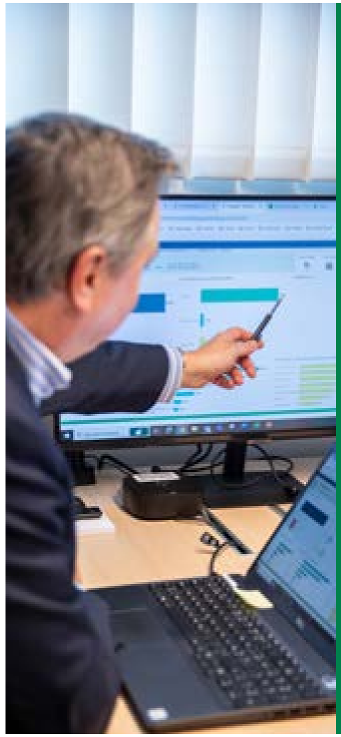
Based on the results of the DMA, the risk profiles will be further expanded in 2025 and adjusted in line with the materiality of the identified risks.

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.

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

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

The company falls under CRR and CRD legislation[1]. Information on Pillar 1 (minimum capital requirements) and Pillar 2 is provided below. BVg's Pillar 3 disclosures are published separately on the company's website.

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.

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

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)

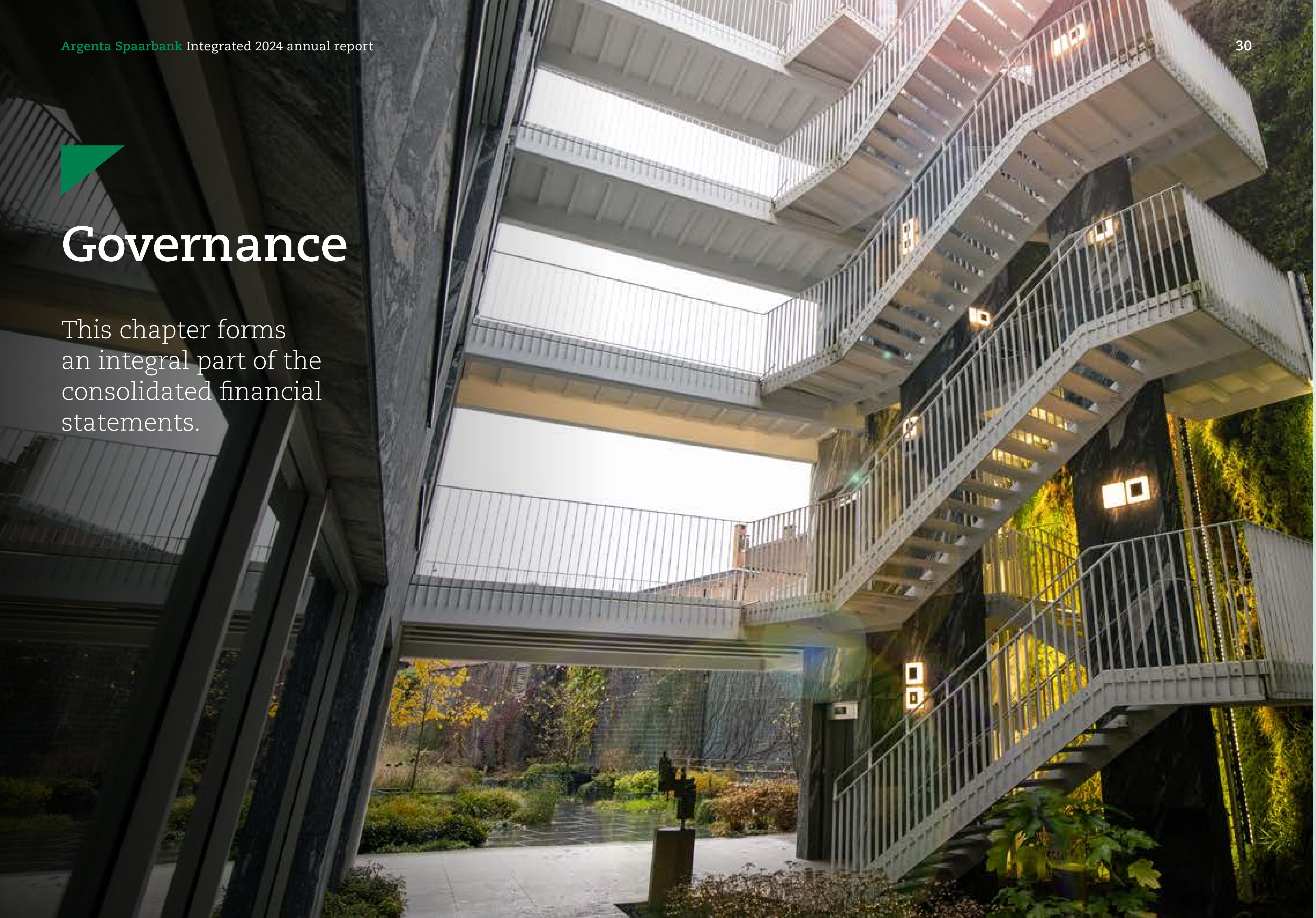
Solvency in the company (unaudited)

The following table shows the company's solvency figures, in accordance with CRR and CRD legislation.

Solvency of the Bank pool	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%**

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. This has led to a decrease of the risk-weighted assets of 1.8 billion euros.



Governance

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

Argenta in 2024
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Group structure

Investar nv
Investeringsmaatschappij Argenta is a mixed financial holding company and owns 87.43% of 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 subsidiaries, Argenta Spaarbank and Argenta Assurantics.

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

- 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 and sister company of the Company. Argenta Assuranties 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.

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.

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 an associated company of Argenta Bank- en Verzekeringsgroep at consolidated level.

An overview of the Group structure for the consolidated financial statements at Argenta Spaarbank level is given below.

Consolidation Group structure	%	31/12/2023	31/12/2024
Argenta Spaarbank nv		consolidating entity	consolidating entity
Argenta Asset Management nv	99.71 %	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

Board of Directors and Committees

This chapter covers the administrative bodies of the various entities.Overview of administrative, management and supervisory bodies

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.

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 Business conduct chapter.

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.ragsregels oplegt en het goede voorbeeld geeft.

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 Governance memorandum.

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.

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 Spaarbank was composed as follows:
- Marc van Heel: chair of the Board of Directors
- Geert Ameloot: executive director and CFO
- Sander Blommaert: executive director and CEO the Netherlands
- Ann Brands: executive director and CO Retail
- Brigitte Buyle: executive director and CIO
- Peter Devlies: executive director and CEO
- Agnita Deweerdt: executive director and CO Affluent & Business
- Marie-Anne Haegeman: non-executive director
- Rudi Peeters: non-executive director and member of the Risk Committee and the Audit Committee
- Baudouin Thomas: non-executive and independent director, chair of the Risk Committee and member of the Audit Committee
- Veerle Timmermans: non-executive and independent director and member of the Risk Committee
- Cynthia Van Hulle: non-executive director
- Bart Van Rompuy: non-executive director
- Raf Vanderstichele: non-executive, independent director, chair of the Audit Committee and member of the Risk Committee
- Gert Wauters: executive director and CRO

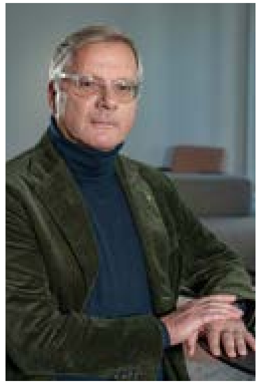
On 26 April 2024, non-executive, independent director Carlo Henriksen retired. On 22 October 2024, Caroline Thijssen resigned as non-executive, independent director.

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.


Marc van Heel

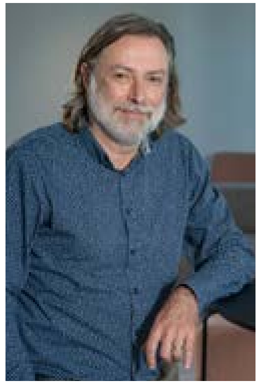

Bart Van Rompuy


Marie-Anne Haegeman


Cynthia Van Hulle


Raf Vanderstichele


Baudouin Thomas


Rudi Peeters


Veerle Timmermans

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).

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).

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, 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

Since 2018, independent director at 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

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 Asssuranties.

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.

Veerle Timmermans

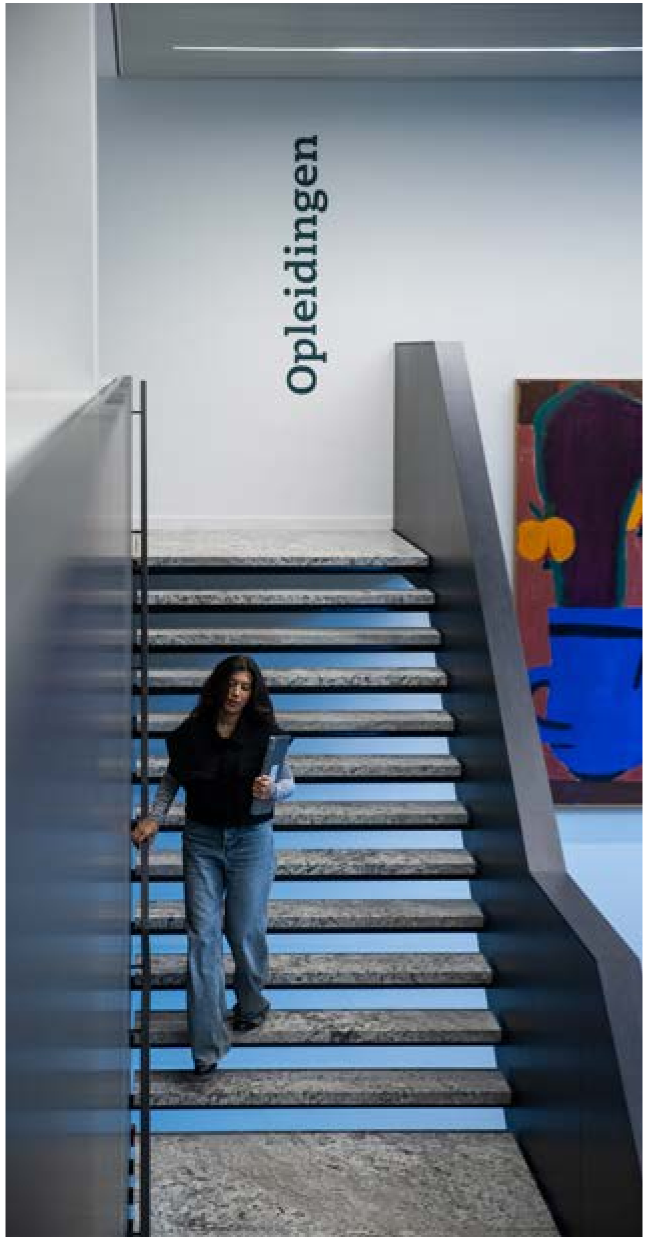
Since 2024, independent director at Argenta

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 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.

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 Assurenties.

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

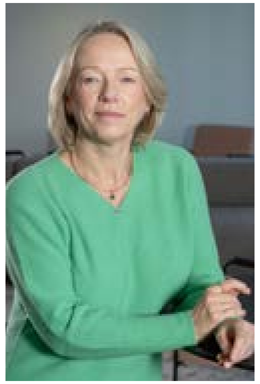
There is an Executive Committee for BVg, Aspa and Aras. The BVg Executive Committee generally meets together with the Aspa and Aras Executive Committees.
The members of the Executive Committee are members of the Board of Directors as executive directors
.
All members of the Executive Committees are expected 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.

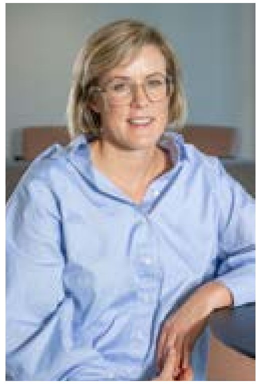

Peter Devlies


Geert Ameloot


Gert Wauters


Ann Brands


Brigitte Buyle


Agnita Deweerdt


Sander Blommaert

Het directiecomité bestond eind 2024 uit deze leden:

Peter Devlies

- Chief Executive Officer (CEO) 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).

Geert Ameloot

- Chief Financial Officer (CFO) since June 2011[2]
- Member of the Board of Directors of Argenta Spaarbank nv, Argenta Assuranties nv and Argenta Bank- en Verzekeringsgroep nv

[2] End of mandate 25 february 2025

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 2023 [3]
- 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.

[3] End of mandate 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

Het directiecomité van Argenta Bank- en Verzekeringsgroep bepaalt het kader waarbinnen de verschillende groepsvennootschappen hun activiteiten en verantwoordelijkheden uitoefenen.

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.

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 senior managers 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.
- 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 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 Argenta Spaarbank amounted to EUR 2,036,052.05. In 2023, this figure was EUR 1,809,922.29.

Contributions to the group supplementary pension and disability policies for the executive directors and chair of the Board of Directors amounted to EUR 501,239.42 in 2024. In 2023, this figure was EUR 408,296.35.

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).

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]
Brands Ann Executive director	Van Ameyde Services Belgium BV - until 12.03.2024	Belgium	Insurance Company	Manager, appointed by Aras	N	N
De pestel Geert Senior manager	G&I Business Consulting BV	Belgium	Managementvennootschap	Director	N	N
Devillé Peter Senior manager	Le Manoir d'Odette BV	Belgium	Management company	Director	N	N
Devlies Peter Executive Director	European Savings and Retail Banking Group	Belgium	European banking association	Director appointed by Aspa	N	N
	Assuralia - since 24.06.2024	Belgium	Professional association of insurance companies	Director appointed by Aras	N	N
	Febelfin - since 20.09.2024	Belgium	Federation for the Belgian financial sector	Member of the Exco Director appointed by Aspa	N	N
	BVB - since 20.09.2024	Belgium	Belgian association of banks and stockbroking companies	Member of the executive committee Director	N	N
	Kompanjon VZW	Belgium	Education	Director	N	N
Es Edmond – until 01.02.2024 Senior manager	Jofico CV	Belgium	Other financial institution	Director appointed by Aspa	N	N
Haegeman Marie-Anne Non-executive director	Euroclear Bank NV	Belgium	Credit institution	Credit institution Executive director	N	N
Henriksen Carlo - until 26.04.2024 Non-executive director	Cofena VZW	Belgium	Culture	Director	N	N
	Royal Golf Club Ostend	Belgium	Golf	Chair	N	N

[4]This concerns the capital link of the companies.

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]
Neutens Wim Senior Manager	Jofico CV	België	Other financial institution	Director appointed by Aspa	N	N
Peeters Rudi 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
Schalk Willy Senior manager	Stichting Alzheimer onderzoek SON	Belgium	Scientific research	Director	N	N
Spans Ben Senior manager	Van Ameyde Services Belgium BV	Belgium	Insurance company	Manager appointed by Aras	N	N
Thijssen Caroline - 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
Thomas Baudouin 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
Timmermans Veerle Non-executive director	Securex VZW	Belgium	External Service for Prevention and Protection at Work	CEO (via 2 Times a Lady)	N	N
	2 Times a Lady BV	Belgium	Management company	Director	N	N
van Heel Marc 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 Charity	Director	N	N
Van Hulle Cynthia 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

Van Rompuy Bart Non-executive director	Investeringsmaatschappij Argenta NV	Belgium	Financial holding company	Director	N	N
	Rapportering en coördinatie BV	Belgium	Management company	Director	N	N
Vanderstichele Raf 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 22,700 excluding VAT
  - auditing assignments: EUR 404,516 excluding VAT
- for subsidiaries of the company:
  - non-auditing assignments: EUR 0 excluding VAT
  - auditing assignments: EUR 90,973 excluding VAT

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.

6 female directors
(total of 16 board members)
37,5 %

3 female directors
(total of 7 directors)
42,9 %

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.

Sustainability Statement

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 (WVV). Reporting within the scope of Article 8 of the EU Taxonomy Regulation has also been incorporated in this section.

Argenta Spaarbank reports its consolidated sustainability information on the 2024 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 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 on 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.

[5]Section 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 PCAF[6] 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.
- 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.

[6] PCAF: Partnership for Carbon Accounting Financials

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.
- 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 Sustainablity 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 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	Board of Directors, advisory and supporting committees
E1 Climate change	• 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	• Sustainability action plan (sustainability manager) • HR policy (HR director)	x	x
S4 Consumers and end users	• Sustainability action plan (sustainability manager) • Proposition strategies (proposition senior managers)	x	x
G1 Business conduct	• Sustainability action plan (sustainability manager) • Governance policy (secretary-general, responsible policies and standards) • Integrity Charter (compliance officer)	x	x
Entity-specific matters: • Investing responsibly • Investing locally • Innovation • Sustainable investment product range • Sustainable credit product range	• Sustainability action plan (sustainability manager) • Sustainable investment policy (sustainability manager, asset managers) • Sustainable homes (proposition directors)	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.

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	• Strategy and business model • Governance of sustainability
Interaction with stakeholders	• 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. The principles of the UN Global Compact serve as a general guideline here, because these principles are supported worldwide and are based on international treaties and conventions.
Identification and assessment of impact	• Employee commitment • Anti-corruption and bribery • Sustainable investment principles
Monitoring and communication	• 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	• 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	• 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	• 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	• 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	•Incorporation of controls, see 3 lines of defence in the CSRD task force • Monitoring of developments by Sustainability team and Legal department

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.

Sustainability strategy

Business model and value chain

Argenta Spaarbank is a bank operating in Belgium and the Netherlands, with 1,041 employees on a consolidated level 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.

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) 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

Argenta sees it as its mission to make banking 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.

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

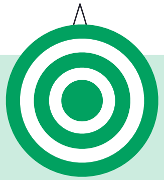
Customers put their trust in our bank. And they only do that if we are and remain a stable and reliable bank, even in the light of significant new and more stringent regulations and technological developments. That is why we constantly set the bar high for ourselves, manage our risks, and strive to achieve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

SREP:

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

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

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 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 Environment (E1), Customers (S4), Employees (S1) en 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.

Value creation model

Input

The resources we need to run our bank, from the time, skills and know-how of our employees to the equity provided by the bank's shareholders.

Financial
Deposits, savings and fees from customers, as well as financial capital from stakeholders and other investors

Social
Focus on extensive simplicity

Intellectual
Investments in innovation, purchased hardware and software, and consultancy services

Production
Use of branches, real estate and equipment

Nature
Consumption of water, energy and other natural resources at our head office

Human capital
Time, expertise and skills of employees, including investments in training and development

Business model

This shows how we translate input via our activities into value for our stakeholders in the value chain.

Our mission
Argenta makes banking simple for families and business, empowering them to make informed choices about improving their financial health.

Our strategic pillars
- Customer relevance
- Simplicity in everything we do
- Argentans
- Professionalism

Our business activities
Banking services
- We provide natural persons and companies alike with banking services.
- Our largest source of income is the net interest income.
- We also receive fees in exchange for our services

Financing and risk management
We finance our loans via deposits, savings accounts and capital markets. In addition, we actively manage the associated risks.

Reinvestment and sharing of return
We use our income to cover our operating expenses, reinvest in our company and pay returns to our shareholders.

Output

The tangible result of our activities and impact on stakeholders in the value chain – such as the loans and mortgages provided to our customers or the salaries and other benefits paid to our employees. The results of our efforts in 2024 for our customers and employees can be found here.

Financial
- Interest paid to customers and counterparties
- Payouts to shareholders and investors
- Tax paid

Social
- Contribution to our customers' financial literacy and cooperation with partners on social matters

Intellectual
- Availability of the app and internet banking
- Consideration for security and privacy

Production
- Provision of mortgages and other loans to individuals and families, and lending to businesses
- Customer investments

Nature
- Reduction in our carbon footprint

Human capital
- The employment and commitment of staff
- Nurturing of talent via training and courses

Outcomes

The impact of our activities on our stakeholders – e.g. how our products and services help customers save and invest.

Financial
- The return on equity for shareholders.
- Return for investors via the issuing of debt securities

Social
- Diversity in management

Customer satisfaction
- NPS +54

Environment
- Our CO_2 reduction targets

Ambassadorship of employees
- eNPS +41

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	• Customer research (via market research, interviews) • Stakeholder survey on sustainability • Branches and contact centre • Argenta website and digital channels • Complaint management	• 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	• Via proxyvoting (via ISS) • Direct interaction via investments in local projects	• To emphasise the importance of ESG at the General Meeting of Shareholders and, in turn, boost the process of making the company more sustainable	• We extend our sustai-nability vision to fund management activities •We want to make a positive impact via our own investment portfolios, by investing locally
Authorities and regu-lators / 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.	• 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	• 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	• We translate this into the sustainable investment policy • We monitor our ESG performance via ESG risk management
Branches	• Stakeholder survey on sustainability • Branch surveys • Direct interaction with head office via various consultative bodies	• 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	• Direct relationship • Supplier diligence processes	• 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 • 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	• 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	• 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	• Stakeholder survey on sustainability • Employee surveys • Social consultative bodies • CPBW • Direct consultation with managers • Confidential contact persons	• 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

Impact, risks and opportunities (IRO)

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.

1 Identify stakeholders

List stakeholders which have an impact on the organisation

Assign weighting to stakeholders based on their significance

2 Determine and define the long list of ESG matters

Long list
- ESRS topics
- Own topics, see NFRD
- Rating agencies (e.g. Sustainalytics)
- Source analysis (e.g. peer analysis, scientific research)

Short list
Reduce to a short list of 54 identified topics

3 Assess matters

1. Produce an IRO canvas template
2. Have matters scored by a group of experts
3. Analyse data

4 Conduct a stakeholder survey

The results from the internal scoring are included in the stakeholder survey. This survey is used to map which sustainability matters are of most importance to our stakeholders. We can then determine the right focus and priorities.

5 Validate and carry out a strategic review

The results of the DMA are validated by the Executive Committee and Board of Directors. The Board of Directors determines the strategy, ambitions and KPIs for the material matters. These are then incorporated in the sustainability action plan and reporting to the Board of Directors.

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.

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 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 adaptation	Climate mitigation Sustainable credit product range
S1 Own workforce	Correct remuneration Engagement Training and development Bonus culture	-	-	-
S4 Consumers and end-users	Customer satisfaction Responsible marketing practices	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

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 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 23 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.

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 been 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.
- 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

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:
- De exposure binnen de portefeuille die blootgesteld is aan klimaat- en milieurisico kan evolueren doorheen de tijd.
- De kans dat een klimaat- en milieurisico-event zich voordoet wijzigt doorheen de tijd of is tijdsafhankelijk.
- De NGFS-klimaatscenario's[7] by design verschillen in de manier waarop klimaat- en milieurisico's verwacht worden zich te materialiseren. We onderscheiden het 'orderly scenario[8], het 'disorderly scenario'[9] en het 'hot house scenario'[10].

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 2024[11] 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).

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[7]Network for Greening the Financial System.
[8]The orderly scenario assumes climate policies are introduced early and become gradually more stringent. Both physical and transition risks are relatively subdued.
[9]The disorderly scenario explores higher transition risks due to policies being delayed or divergent across countries and sectors.
[10]The 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.
[11]Argenta 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.

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.

Materiality analysis 2024	Climate risk - transition risk		Climate risk - physical risk		Other environmental risks		Social risks		Governance risks	
	KRIs available	Final assessment	KRIs available	Final assessment	KRIs available	Final assessment	KRIs available	Final assessment	KRIs available	Final assessment
Financial risk: credit risk										
Mortgages in BE Aspa	x	Material	x	Material		Not material		Not material		n/a
Mortgages NL Aspa	x	Material	x	Material		Not material		Not material		n/a
LOA		Not material		Not material		Not material		Not material		n/a
Investment Ptf Aspa	x	Material	x	Material	x	Not material	x	Not material	x	Not material
Financial risk: market risk & liquidity risk										
Wholesale funding & liquidity	x	Material		Not material		Not material		Not material		Not material
Financial risk: business risk										
Funds (Argenta AAM & Arvestar)	x	Material		Not material		Not material		Not material		Not material

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 Spaarbank's various business activities, based on the various climate scenarios (orderly, disorderly and hot house scenarios):

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							
Investment activities Aspa	x	x		x	x		x	x				
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							
Investment activities Aspa	x	x		x	x		x	x				
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			x			
Investment activities Aspa				x	x	x	x	x	x			
Wholesale funding												
Asset management activities												

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 CO_2 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.[12] 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 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.

Investment portfolio of the bank
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 CO_2 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.

- 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.

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.

Stress tests

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

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.

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.

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.

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 ICMA[12] 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.

[12] International Capital Market Association

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.

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.

Argenta rapporteert over de activiteiten die eligible en aligned zijn, in lijn met de EU Taxonomy regulation 2020/852 art. 8. Voor deze verklaring verwijzen we naar hoofdstuk 6.5 Taxonomy rapportering.

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 CO_2 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.

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:

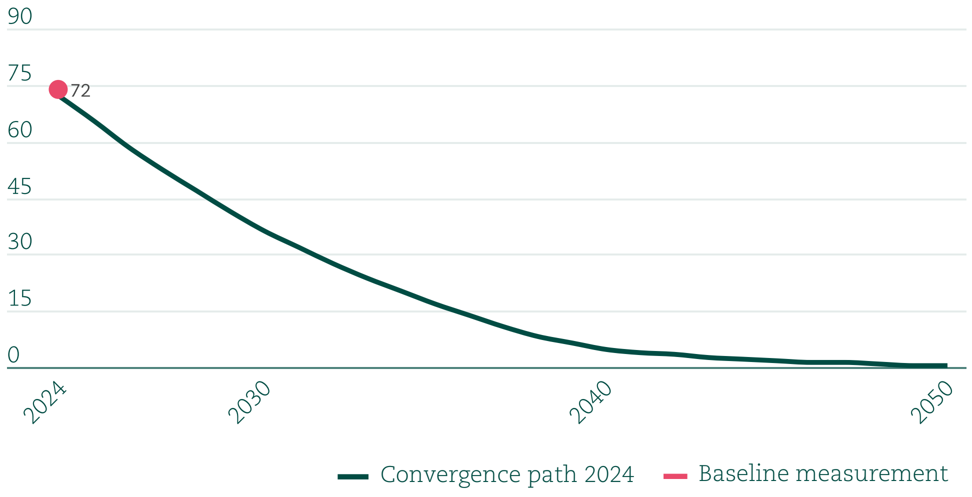
- We expect the government to impose a general obligation to renovate alongside the existing obligation to renovate when property is purchased (in Flanders). We expect the requisite EPC rating to become more stringent over time in both cases.
- We assume there will be a sharp increase in the degree of 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

Development 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]

[13] Argenta 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.

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 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.

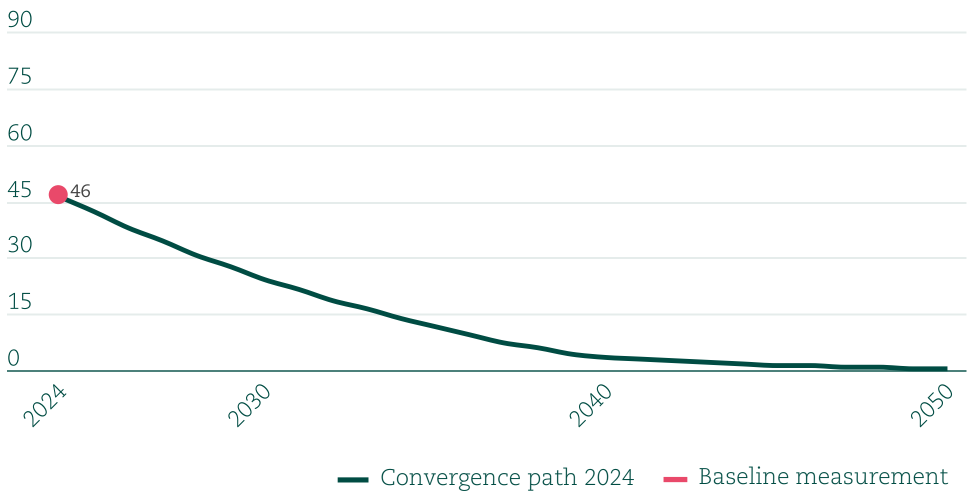
The mortgage portfolio of Argenta Nederland is composed of properties with relatively favourable EPC labels (A and B). The transition model is based on the general assumption that the Dutch government will incentivise the process of making homes more sustainable.

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 Warmtefonds (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

Development of emission intensity The Netherlands



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:

[14] Argenta 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.

- 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.

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

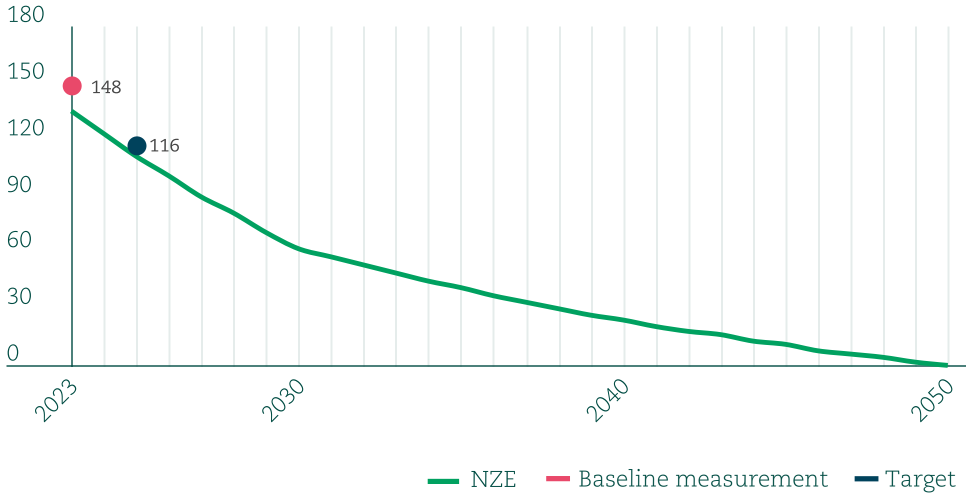
Transition plan

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 CO_2 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.

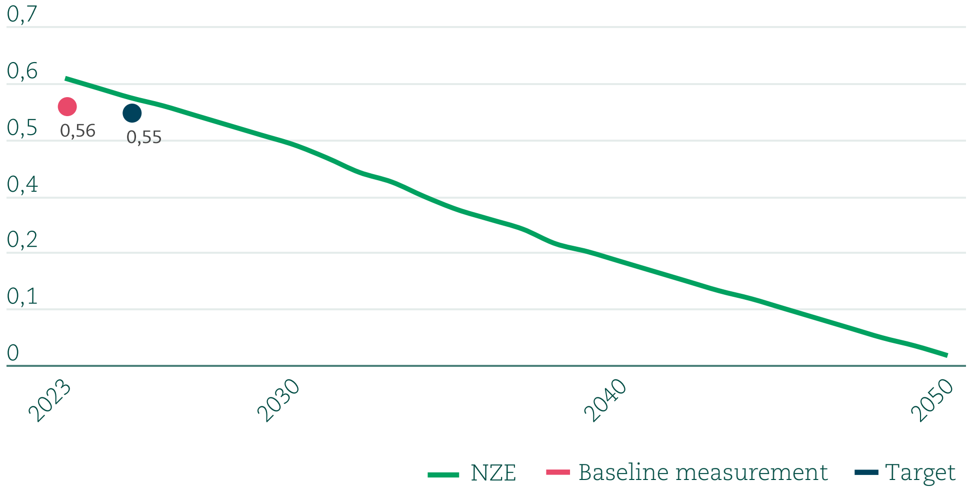
In 2024, Argenta engaged an external data provider, ESG Moody's, to collate the counterparties' emission data (Scopes 1, 2 and 3). Data coverage is a focus area on which we must continue working in the coming years. For any missing data, we use PCAF as an approximation. The PCAF standard provides for 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 positions[15] 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 CO_2 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 (gCO_2/vkm)

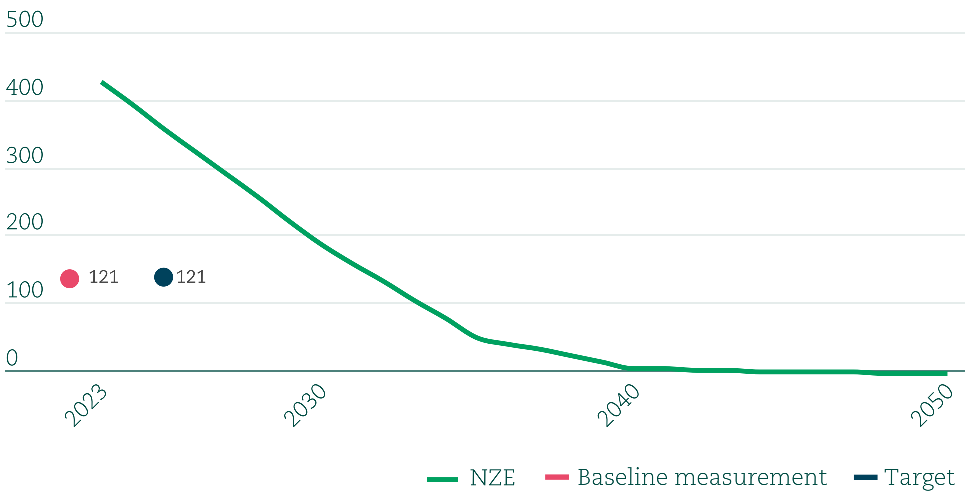


Cement (tCO_2/t)



[15] These 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-scenarionze

Electricity (gCO_2/kWh)



Reduction targets in investment activities:[17]

	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.

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

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.

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, 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 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 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.

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 investment portfolios (transition risk, limit key figure)
- E-score (environmental score) for the bank’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)

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)	311	296	279	260	242	223
Average EPC value of mortgages in the Netherlands (Aspa, Aras)	206	212	203	194	186	177
Carbon-transition score of the investment portfolio (Aspa, Aras)	15	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.

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 country:[21]

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%	44.99%
Production of non-renewable energy	-	-	-
Production of renewable energy	-	-	-

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

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 protocol.[22]

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, 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 3,870,004 tCO_2e (market-based), 99% of which relate to the core activities and less than 1% to own activities.

	Retrospective base year 2024	% of total greenhouse gas emissions
Scope 1 emissions		
Gross Scope 1 emissions (tCO_2eq)	1,696.23	0.04%
Scope 2 emissions		
Gross location-based Scope 2 emissions (tCO_2eq)	446.51	0.01%
Gross market-based Scope 2 emissions (tCO_2eq)	34.96	0.00%
Significant Scope 3 emissions		
Total gross indirect (Scope 3) emissions (tCO_2eq)	3,868,273.00	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	0.03%
15 Investments	3,866,725.64	99.92%
Mortgages in Belgium	575,098.84	14.86%
Mortgages in the Netherlands	381,460.80	9.86%
Investment portfolios of the bank	2,910,166.00	75.20%
Total greenhouse gas emissions		
Total greenhouse gas emissions (location-based) (tCO_2eq)	3,870,415.74	100.0%
Total greenhouse gas emissions (market-based) (tCO_2eq)	3,870,004.20	100.0%

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

Greenhouse gas intensity based on net revenue	2024
Total greenhouse gas emissions (location-based) (tCO_2eq) based on net revenue	0.005
Total greenhouse gas emissions (market-based) (tCO_2eq) based on net revenue	0.005

Net revenue used to calculate greenhouse gas intensity	EUR 837,752,770
Net revenue (other)	-
Total net revenue (in financial statements)	EUR 837,752,770

Operational activities in Belgium, the Netherlands and Luxembourg

The greenhouse gas emissions from own activities of the Argenta Groupamounted to 3,280 tonnes CO_2 (market-based method) in 2024. 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
- CO_2 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 the Argenta Group'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.

The head office in Belgium runs a monitoring system for CO_2, 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 suppliers.[24]

Scope 3 emissions

The Scope 3 emissions comprise the greenhouse gas emissions from own activities of the Argenta Group 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.

[24] Luxembourg's electricity consumption is based on the figures for 2023.
[25] The 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.

The lending activities in Belgium and the Netherlands represent around 25% of total emissions in 2024. The investment activities of the bank represent 75% 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	Financed emissions are calculated using the PCAF methodology, in absolute terms in tCO_2eq and in relative terms as intensity in $kgCO_2eq/m^2$. The applied emission factors are based on the published energy balances of the Belgian and Netherlands governments. 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. If neither of these is available, we use the PCAF proxy. Scopes 1 and 2 are included in the calculation.	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.
Listed & unlisted equity, corporate bonds and business loans	Financed emissions are calculated using the PCAF methodology in absolute and relative emissions based on the investment portfolio of ASPA as at 31 December 2024. 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. Scopes 1, 2 and 3 are included in the calculations.	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. 85% 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.
Government bonds	Financed emissions are calculated using the PCAF methodology in absolute emissions based on the investment portfolios of ASPA as at 31 December 2024 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. Scopes 1, 2 and 3 are included in the calculations.	For Scopes 2 and 3, we use 2018 data published by the PCAF.

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 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.

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.

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

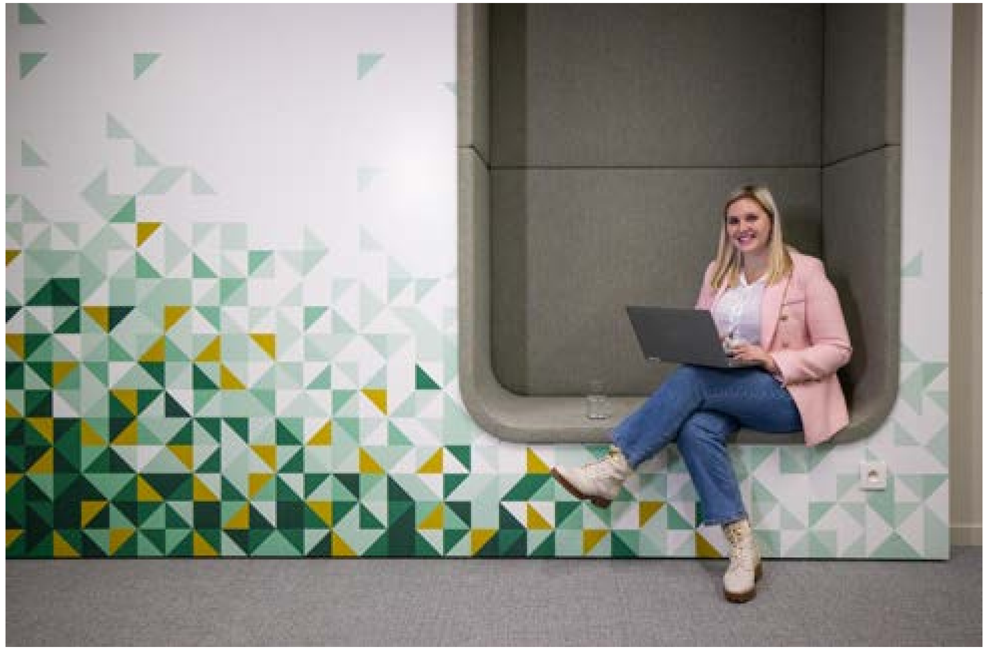
We have been systematically gauging customer satisfaction since 2011 via market research. The Net Promoter Score (NPS) gives an indication of the probability that customers will recommend Argenta, for example to family and friends. The score thereby correlates with customer loyalty. The score is expressed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

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: Ombudsfin (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.

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.

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.

Argenta in 2024
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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.

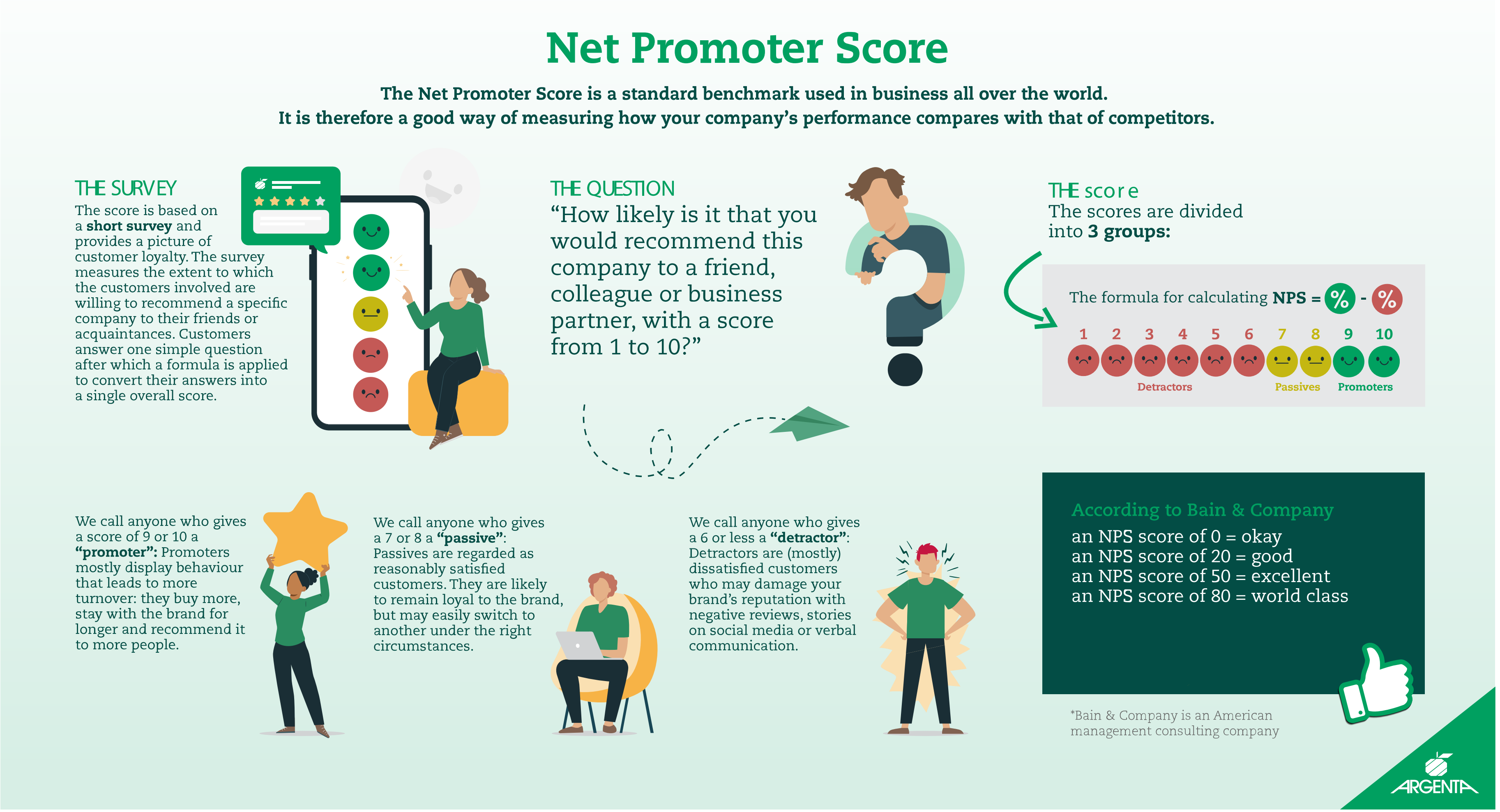
The internal training platform is used to measure and monitor the figures on attended training sessions (mandatory as well as additional training sessions), with reporting taking place on a quarterly basis. Employees who have not completed the mandatory training are monitored via the sanctions policy.

The target is tracked by the Chief Information Security Office.

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.

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.



'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 CO_2 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.

At 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.

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, 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 bank pooland 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 bank pooland the business or management school, supplier or temporary employment agency. 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.

Characteristics of our in-house employees

By “head count”, we mean the number of active in-house employees employed at the Argenta bank poolas 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	942
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	562
Female	458

Head count of permanent in-house employees, by country

Country	2024
Belgium	940
The Netherlands	67
Luxembourg	21
Total	1.028

Head count of permanent in-house employees, by country

Gender	2024
Male	568
Female	460

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

Geslacht	2024
Male	9
Female	4

Head count of full-time in-house employees by gender and country

Country	Gender	2024
Belgium	Male	478
Belgium	Female	275
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	48
Belgium	Female	141
Luxembourg	Male	6
Luxembourg	Female	5
The Netherlands	Male	3
The Netherlands	Female	20

The workforce at Argenta bank pool is 45% women and 55% 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	92
The Netherlands	7
Luxembourg	2
Total	101

Turnover percentage of in-house employees

Country	2024
Belgium	10.23%
The Netherlands	9.46%
Luxembourg	10.53%
Total	10.15%

Characteristics of non-salaried employees

By head count, we mean the number of active non-salaried employees employed at the Argenta bank poolas at 31 December 2024. The characteristics refer to the non-salaried employees in Belgium, the Netherlands and Luxembourg.

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 the bank pool 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
ASPA	Male	22
ASPA	Female	8

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 Bank Pool	<30	0	97
Argenta Bank Pool	30-50	12	631
Argenta Bank Pool	>50	18	313

Work-life balance

Argenta voorziet standaard voltijdse posities binnen de organisatie. Deeltijds werk is mogelijk op verzoek van de medewerker en dus een volledig vrijwillige keuze. Medewerkers verzoeken hier voornamelijk om in functie van een betere werk-privébalans. Deeltijds werk is mogelijk onder verschillende vormen: tijdskrediet, thematisch verlof en contractueel deeltijds. Alle medewerkers hebben recht op minstens één van de types van gezinsverlof.

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 Bank Pool	Total	7.30%
Argenta Bank Pool	Male	4.51%
Argenta Bank Pool	Female	10.78%

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.

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 Bank Pool	13.40%

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 Bank Pool	2.99

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

De directeur Organisatie & Talent is eigenaar van de beleidslijn. Het directiecomité, remuneratiecomité, risicocomité en de Raad van Bestuur zijn bevoegd voor de uitvoering.

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.

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 6.4.2 on corporate culture and business conduct 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.

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 GoodHabitz, 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 ourselves as well as Argenta.
4. Digital enthusiasm: we work on digital skills and explore new tools and technologies.

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.

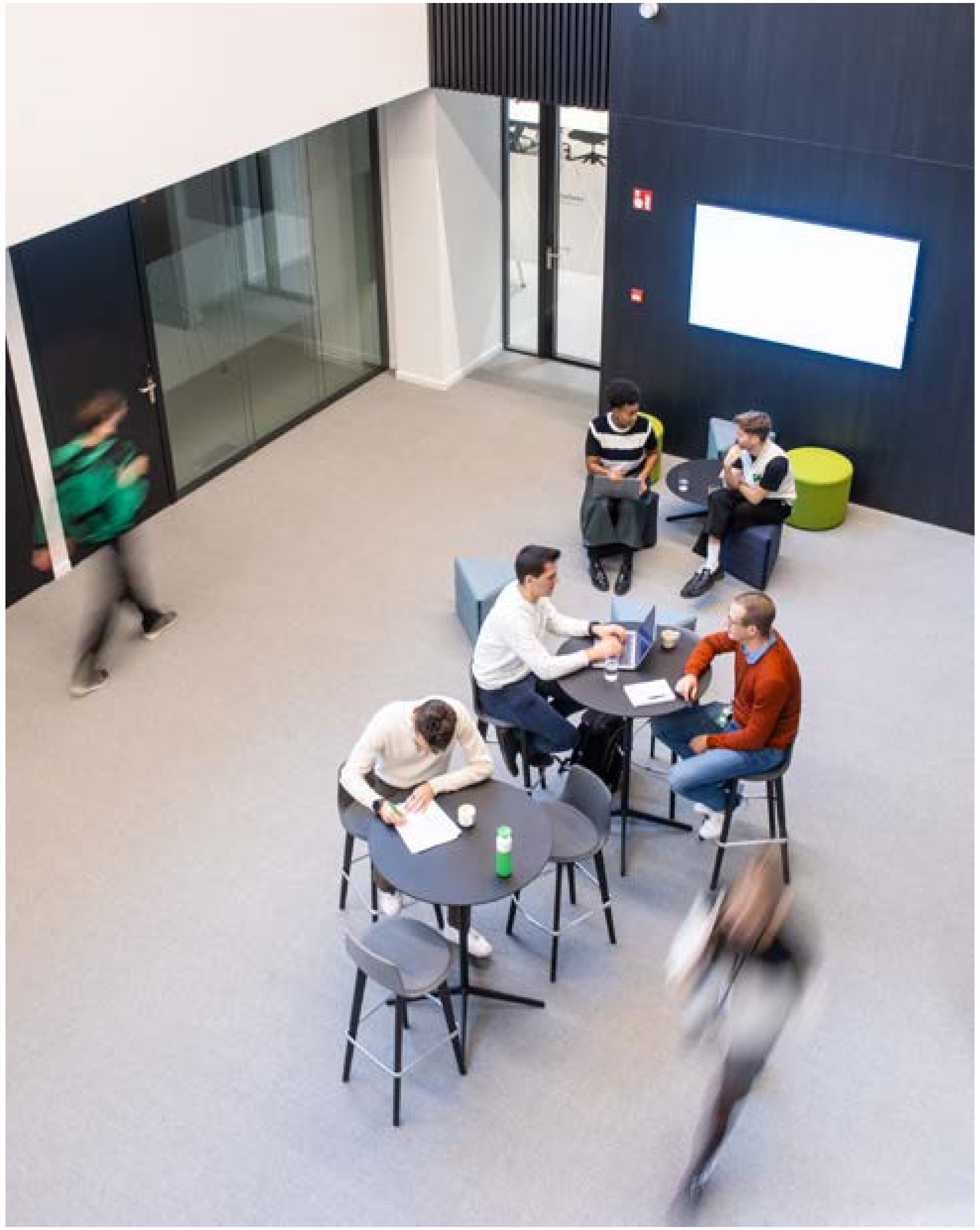
Overview of training and development[26]

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	4.7	526	18,294.92
Belgium	Female	4.4	416	13,363.62
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		4.7	1,041	35,733.10

Incidents

In 2024, there were no incidents in the context of human rights.



[26]Argenta 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.

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.

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. And that might lead to financial sanctions.

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-out 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.

- **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.

DOPE

Dichtbij
Ondernemend
Pragmatisch
Eenvoudig

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.

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.

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. 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).

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.

[27] In 2024, Argenta reported all in-house employees in a higher-risk function, in order to meet the reporting requirement.

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 directors who completed at least 1 training in 2024	69%
Number of senior managers (DC-1) 31.12.2024	**21**
Number of senior managers who completed at least 1 training in 2024	17
Total hours in 2024	35.5
Percentage of senior managers who completed at least 1 training in 2024	81%
Number of in-house employees as at 31.12.2024	**1,041**
Number of employees who completed at least 1 training in 2024	902
Total hours in 2024	2,293.5
Perentage 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%).

Anti-money laundering

Laundering practices and terrorism financing can undermine the sustainability of Argenta and the society. In the AML/CFT[28] 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.

[28]AML/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.

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.

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 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.

Aras 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.

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, and can therefore include the four 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) and investment firms (Annex VIII).

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.

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 Pool, the reporting will be split into Argenta as a credit institution 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 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%
Asset management - GIR	1.77%	2.16%
Consolidated KPI	11.22%	11,42%

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 exter-nal data provider (Moody's ESG Solutions) which pro-vides 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.
	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 assets. Mortgage loans for the purchase 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. The substantial contribution criteria are assessed on the basis of the year of construction[29] 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. 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. The substantial contribution criteria are assessed on the basis of the year of construc-tion 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] 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. Renovation loans and car loans from 1 January 2020 are reported as taxonomy-eligible. 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.	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. 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.
Local governments	Exposures to local governments are considered as not eligible and not aligned. Argenta only has general loans to local governments. All these exposures are unknown 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.

[29] In 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.
[30] In 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	0,0851

			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	0,0483
	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 dislcose 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

		Disclosure reference date T																														
Million EUR			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)				
		Total [gross] carrying amount	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	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	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								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																							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																							39.165,97	5.888,83	5.888,83		
of which building renovation loans	26	1.529,29	1.529,29																									1.529,29				
of which motor vehicle loans	27	212,21	212,19																									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	41.332,54	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
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	41.332,54	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
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																
Financial guarantees	54	5,26																														
Assets under management	55	20.069,59	650,06	286,41	0,00	23,69	149,44	7,70	0,83	0,00	0,48	0,40	0,16	0,00	0,02	77,56	4,54	0,00	3,37	118,44	0,34	0,00	0,00	0,20	0,03	0,00	0,00	854,36	292,31	0,00	23,69	153,31
Of which debt securities	56	5.397,57	37,94	17,98	0,00	1,06	9,80	0,61	0,01	0,00	0,01	0,07	0,03	0,00	0,00	4,49	0,60	0,00	0,45	1,35	0,14	0,00	0,00	0,12	0,03	0,00	0,00	44,59	18,78	0,00	1,06	10,25
Of which equity instruments	57	14.101,81	612,13	268,43	0,00	22,62	139,65	6,91	0,82	0,00	0,47	0,32	0,13	0,00	0,01	73,07	3,94	0,00	2,92	117,08	0,20	0,00	0,00	0,08	0,00	0,00	0,00	809,59	273,53	0,00	22,62	143,05

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 collaterals 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																	38.755,11	5.344,49		6,09	310,16
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	38.226,08	5.344,18		6,09	309,84	177,76	0,32		0,32																	38.755,11	5.344,49		6,09	310,16
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																
Financial guarantees	54	4,57																														
Assets under management	55	16.971,32	597,76	273,93	0,00	16,29	172,78	60,28	0,05	0,00	0,04	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	658,04	273,98	0,00	16,29	172,82
Of which debt securities	56	5.917,67	41,00	18,97	0,00	0,68	9,85	9,20	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	50,20	18,97	0,00	0,68	9,85
Of which equity instruments	57	10.500,75	556,76	254,96	0,00	15,61	162,93	51,09	0,05	0,00	0,04	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	607,84	255,01	0,00	15,61	162,97

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 collaterals 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 - 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 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																							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																							39.165,97	5.888,83	5.888,83		
of which building renovation loans	26	1.529,29	1.529,29																									1.529,29				
of which motor vehicle loans	27	212,21	212,19																									212,19				
Local governments financing	28	297,85																														
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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																														
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Loans and advances	35	869,31																														
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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. 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 collaterals 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 - CapEx

Disclosure reference date T-1

Million EUR		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																																
Financial guarantees	54	4,57																														
Assets under management	55	16.971,32	924,39	394,24	0,00	23,47	219,72	22,46	6,20	0,00	0,01	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	946,85	400,44	0,00	23,47	219,73
Of which debt securities	56	5.917,67	69,27	37,63	0,00	1,03	17,02	1,93	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	71,21	37,63	0,00	1,03	17,02
Of which equity instruments	57	10.500,75	855,12	356,61	0,00	22,44	202,70	20,52	6,20	0,00	0,01	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	875,64	362,81	0,00	22,44	202,71

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 collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
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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

		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)			
	Breakdown by sector - NACE 4 digits level (code and label)	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)	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			

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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.

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 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																									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	0,8043	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 dislcose 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 environmentatlly 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

% (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 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 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	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	0,8365	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		0,0000	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																															
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		0,0000	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		0,0000	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		0,0000	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 dislcose 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 environmentatlly 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

		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)					
% (compared to total covered assets in the denominator)		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 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	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																								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	0,7739	0,1081		0,0003	0,0054																					0,7810	0,1081		0,0003	0,0054	1,0000

1. Institution shall dislcose 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 environmentatlly 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 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)					
% (compared to flow of total eligible assets)		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	0,7888	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																															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	0,7888	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 dislcose 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

Disclosure reference date T

% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		Proportion of total covered assets funding 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
	CODE	a	b	c	d	e	f	g	h	i
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

% (compared to total eligible off-balance sheet assets)		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding 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
	CODE	j	k	l	m	n	o	p	q	r	s	t	u
Financial guarantees (FinGuar KPI)	1												
Assets under management (AuM KPI)	2	0,0005	0,0002		0,0000	0,0908	0,0053		0,0039	0,1386	0,0004		0,0000

% (compared to total eligible off-balance sheet assets)		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 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	v	w	x	z	aa	ab	ac	ad	ae
Financial guarantees (FinGuar KPI)	1									
Assets under management (AuM KPI)	2	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

		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)				
% (compared to total eligible off-balance sheets assets)		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
	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
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

		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)				
% (compared to total eligible off-balance sheets assets)		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
	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
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		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

		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)				
% (compared to total eligible off-balance sheets assets)		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
	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
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		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 Asset Management and Arve

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.

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 Spaarbank - blootstelling buiten balansstelling

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	0,00	0,0000	0,00	0,0000	0,00	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	0,02	0,0000	0,02	0,0000	0,00	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	0,16	0,0000	0,16	0,0000	0,00	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	0,0000	0,00	0,0000	0,00	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	287,06	0,0174	286,23	0,0174	0,83	0,0001
Total applicable KPI	8	287,24	0,0174	286,41	0,0174	0,83	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	0,0000	0,00	0,0000	0,00	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	0,03	0,0000	0,03	0,0000	0,00	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	0,01	0,0000	0,01	0,0000	0,00	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	0,01	0,0000	0,01	0,0000	0,00	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	0,00	0,0000	0,00	0,0000	0,00	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	354,25	0,0215	353,71	0,0215	0,54	0,0000
Total applicable KPI	8	354,30	0,0215	353,76	0,0215	0,54	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	1,0000
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	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	1,0000
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	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	6,87	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	6,87	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	%
	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	0,00	0,0000	0,00	0,0000	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	0,00	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	2,15	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	2,15	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

Other statements

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 bodies	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 remu-nera-tion 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 invest-ment pro-duct 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 manage-ment	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.

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 inhouse 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 preven-tion 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: • 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 satisfaction	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 bodies	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.

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 objectives, 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 Commit-tee	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	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: • 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 devel-opment	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	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. 1/ We adopt a general sustainable exclusion policy for our own investment portfolio, our Argenta funds and the Arvestar funds. 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. 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.
Responsible mar-keting 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 em-ployees using the well-being indicators, which we use to gauge the drivers and levers impacting employees' well-being at Argenta.

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.54
BP-2	Disclosures in relation to specific circumstances	p.55-56
GOV-1	The role of the administrative, management and supervisory bodies	p.35-47
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	p.35-49
GOV-3	Integration of sustainability-related performance in incentive schemes	p.48, 58
GOV-4	Statement on due-diligence	p.58
GOV-5	Risk management and internal controls over sustainability reporting	p.58-59
SBM-1	Strategy, business model and value chain	p.60-63
SBM-2	Interests and views of stakeholders	p.64
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p.-67-68, 69-70, 95-96, 104, 105, 117-119, 125, 127, 129
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	p.65-67
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	p.68, 172-176

Environment Disclosure requirement		Page
E1 - Climate change		
ESRS2 GOV-3	Integration of sustainabilityrelated performance in incentive schemes	p.48, 58
E1-1	Transition plan for climate change mitigation	p.80-89
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p.69-70
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	p.70-74
E1-2	Policies related to climate change mitigation and adaptation	p.79-80
E1-3	Actions and resources in relation to climate change policies	p.80-89
E1-4	Targets related to climate change mitigation and adaptation	p.80-89
E1-5	Energy consumption and mix	p.90
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	p.91-95

Social Disclosure requirements		Page
S1 - Own workforce		
ESRS 2 SBM-2	Interests and views of stakeholders	p.64, 105
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p.105
S1-1	Policies related to own workforce	p.109-111
S1-2	Processes for engaging with own workers and workers' representatives about impacts	p.112
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	p.112-113
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.113-116
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p.113-116
S1-6	Characteristics of the undertaking's employees	p.106-107
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	p.107-108
S1-8	Collective bargaining coverage and social dialogue	p.108
S1-9	Diversity metrics	p.108
S1-10	Adequate wages	p.109
S1-13	Training and skills development metrics	p.113-115
S1-15	Work-life balance metrics	p.108
S1-16	Compensation metrics (pay gap and total compensation)	p.109
S1-17	Incidents, complaints and severe human rights impacts	p.116

Social Disclosure requirements		Page
S4 - Klanten		
ESRS 2 SBM-2	Interests and views of stakeholders	p.64, 96
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p.95-96
S4-1	Policies related to consumers and end-users	p.96-98
S4-2	Processes for engaging with consumers and endusers about impacts	p.98-99
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	p.99-100
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.100-102
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p.102-104

Governance Disclosure requirements		Page
G1 - Verantwoord beleid		
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	p.35-47
SRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	p.65-67
G1-1	Business conduct policies and corporate culture	p.119-123
G1-3	Prevention and detection of corruption and bribery	p.123-125
G1-4	Confirmed incidents of corruption or bribery	p.125

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	Bench-mark regulation reference	EU Klimaatwet	Material	Page
ESRS 2 GOV-1	21 d	Board's gender diversity	■		■		Yes	p.52
ESRS 2 GOV-1	21 e	Percentage of board members who are independent			■		Yes	p.36
ESRS 2 GOV-4	30	Statement on due diligence	■				Yes	p.58
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.80-89
ESRS E1-1	16(g)	Undertakings excluded from Paris-aligned benchmarks		■	■		Yes	p.80-89, 125-129
ESRS E1-4	34	GHG emission reduction targets	■	■	■		Yes	p.80-89
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.90
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.91-95
ESRS E1-6	53-55	Gross GHG emissions intensity	■	■	■		Yes	p.92
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	
ESRS E1-9	67(c)	Breakdown of the carrying value of its real estate assets by energyefficiency classes		■			Phase-in	

Disclosure requirement	Paragraph	Datapoint	SFDR	Pijler 3	Bench-mark regulation reference	EU Klimaatwet	Material	Page
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 EPRTR 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 reused	■				No	
ESRS E3-4	29	Total water consumption in m^3 per net revenue on own operations	■				No	
ESRS 2 IRO-1 E4	16(a) i		■				Yes	p.65-68
ESRS 2 IRO-1 E4	16(b)		■				Yes	p.65-68
ESRS 2 IRO-1 E4	16(c)		■				Yes	p.65-68
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.109
ESRS 2 SBM-3 S1	14(g)	Risk of incidents of child labour	■				Yes	p.109
ESRS S1-1	20	Human rights policy commitments	■				Yes	p.109
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			■		Yes	p.109
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	■				Yes	p.109
ESRS S1-1	23	workplace accident prevention policy or management system	■				Yes	p.111
ESRS S1-3	32(c)	Grievance/complaints handling mechanisms	■				Yes	p.112-113
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	
ESRS S1-16	97(a)	Unadjusted gender pay gap	■		■		Yes	p.109

Disclosure requirement	Paragraph	Datapoint	SFDR	Pijler 3	Bench-mark regulation reference	EU Klimaatwet	Material	Page
ESRS S1—16	97(b)	Excessive CEO pay ratio	■				Yes	p.48
ESRS S1-17	103(a)	Incidents of discrimination	■				Yes	p.116
ESRS S1-17	104(a)	Nonrespect of UNGPs on Business and Human Rights and OECD	■		■		Yes	p.116
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	■				No	
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	■		■		No	
ESRS S3-4	36	Human rights issues and incidents	■				No	
ESRS S4-1	16	Policies related to consumers and end-users	■				Yes	p.96-98
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	■		■		Yes	p.96-98
ESRS S4-4	35	Human rights issues and incidents	■				Yes	p.99-100
ESRS G1-1	10(b)	United Nations Convention against Corruption	■				Yes	p.123-124
ESRS G1-1	10(d)	Protection of whistleblowers	■				Yes	p.122
ESRS G1-4	24(a)	Fines for violation of anti-corruption and anti-bribery laws	■		■		Yes	p.123-124
ESRS G1-4	24(b)	Standards of anticorruption and anti-bribery	■				Yes	p.123-124

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, strategy 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 environmental 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 reporting	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 sustainability 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

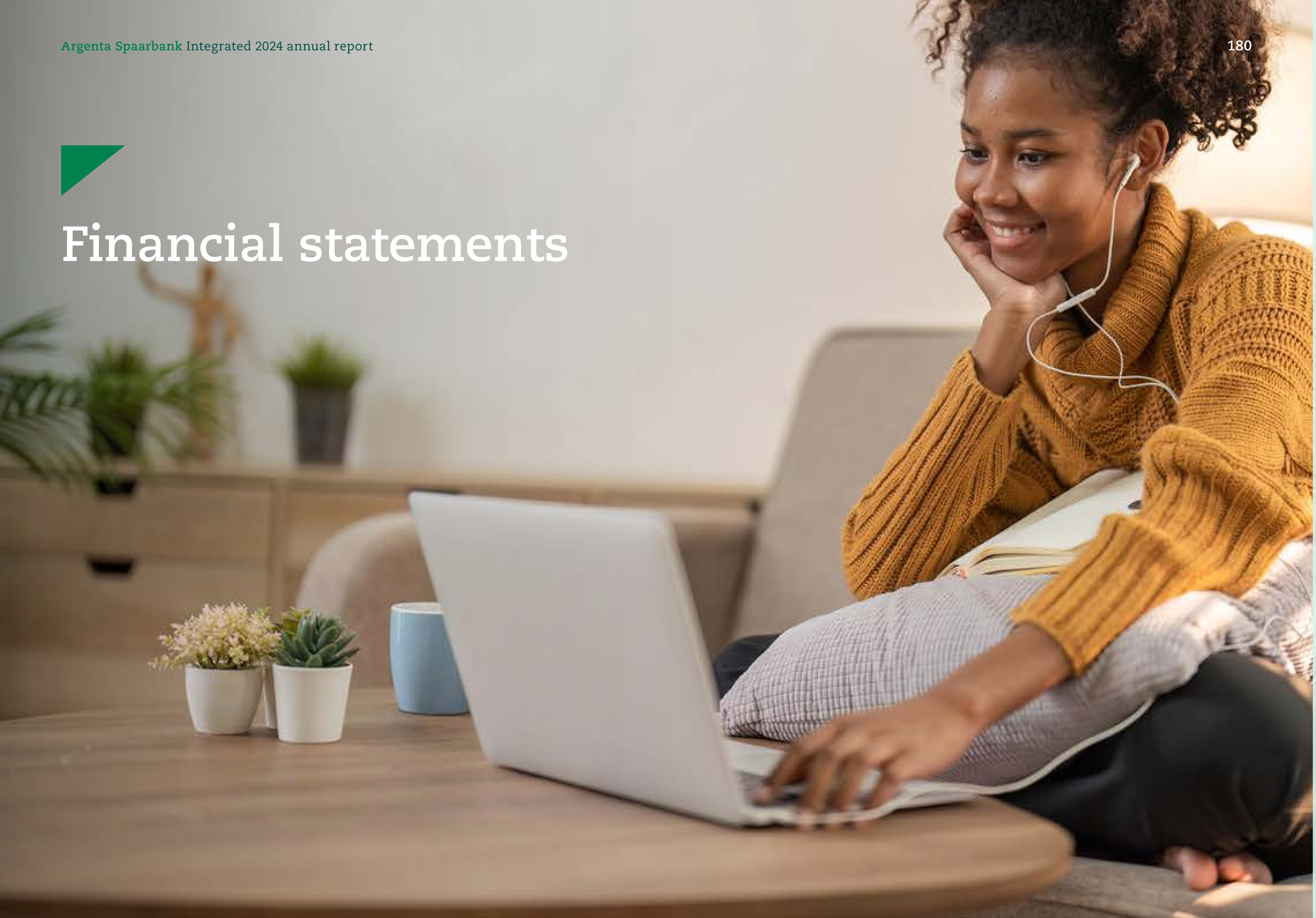
Qualitative note in context of social risks

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

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. Transparancy 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. Transparancy e. Conflicts of interest Internal communication with regard to controversies	4.1 Risk policy 4.1.4 Risk policy on sustainability

Financial statements



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) remain unchanged after the share transfer and are described in an amended version of the Financial Management Agreement entered into between Arvestar and DPAM that also entered 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.

Argenta in 2024
Table of contents

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.

In 2024 there was also close collaboration between IT and the business and suppliers, enabling Argenta to regularly deliver new functionalities to stay in line with the evolving environment. The continuity of the IT platforms remains a priority here, i.e. the continued availability, reliability, stability, predictability and security of these platforms.

Moreover, the introduction of more and more digital flows means fewer paper documents and fewer administrative trips to the branch are required. In addition, IT is making the environmental footprint of the technological landscape more sustainable by maximising optimisation.

The most important visible development for customers is the further refinement of the Argenta app, which is increasingly widely used by Argenta customers.

Capital increases

During the 2024 financial year, the Company carried out a capital increase of EUR 70,124,625 on 21 October. No new shares were issued. This increased the Company's capital from EUR 1,009,963,900 to EUR 1,080,088,525.

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.

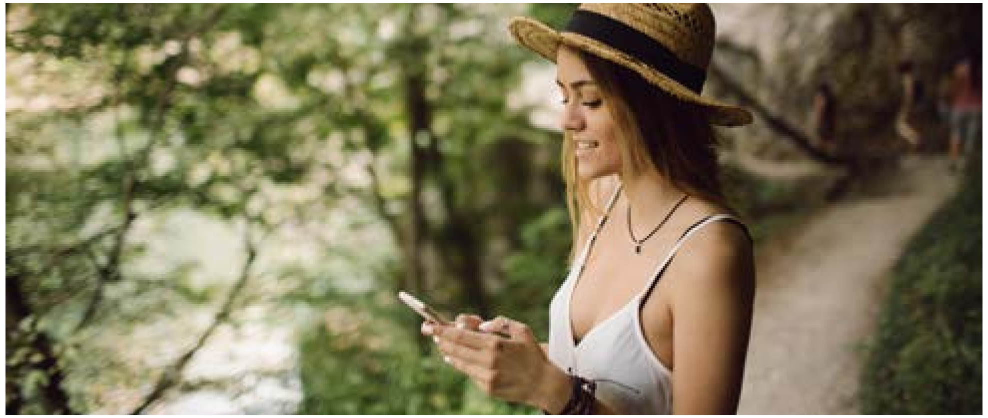
Measures using financial instruments

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.



Discussion of the separate financial statements of Argenta Spaarbank

Balance sheet

Total assets increased by more than EUR 2.4 billion in 2024, from EUR 51,232,320,212 to EUR 53,634,842,799.

On the asset side, we see an increase in receivables from credit institutions, from EUR 2.1 billion to EUR 2.4 billion. Furthermore, there is an increase in receivables from customers, from EUR 38.1 billion to EUR 40.6 billion, while the portfolio of bonds and other fixed-income securities fell from EUR 10.2 billion to EUR 9.7 billion.

These developments are due to the continued production of mortgage loans in both Belgium and the Netherlands and the maintenance of the investment portfolio as a liquid and profitable buffer.

Overview of main asset components	31/12/2023	31/12/2024
Receivables from credit institutions	2,078,754,282	2,403,867,577
Receivables from customers	38,087,504,956	40,662,376,397
Bonds and other fixed-income securities	10,223,732,220	9,776,687,065
issued by public bodies	2,205,293,396	2,360,645,818
issued by other borrowers	8,018,438,824	7,416,041,246

On the liabilities side, liabilities to customers increased by EUR 1.1 billion from EUR 42.1 billion to EUR 43.2 billion. Savings amounted here to EUR 27.2 billion at the end of 2024.

Due to a big maturity date for the term account at 1 year, where both the loyalty account and term accounts were promoted as follow-on investments, there is a return to an increase in savings (savings books) and a decrease in the term account (with agreed maturity date or period of notice).

The portfolio of debt securities increased from EUR 5.1 billion to EUR 6.2 billion as a result of new issues (3 covered bond issues totalling EUR 2 billion) and repayment of an outstanding Green Apple issue.

Overview of main liabilities items	31/12/2023	31/12/2024
Liabilities to credit institutions	1,079,535,811	839,899,910
Liabilities to customers	42,059,218,053	43,193,584,175
Savings deposits	24,739,930,217	27,201,989,886
Payable on demand	8,881,324,052	9,107,533,487
with agreed maturity dates or periods of notice	8,437,963,784	6,884,060,802
Debt securities in issue	**5,091,528,255**	**6,274,830,730**
Subordinated liabilities	**0**	**0**

During 2024, additional swaps and swaptions were entered into in the context of the ALM interest rate risk policy. The unconsolidated balance sheet shows the pro rata interest of the swaps and the unamortised premiums of the caps, while swaptions are included in accrued expenses and deferred income.

Result

The profit for the financial year available for appropriation amounts to EUR 273,589,598, compared with EUR 260,079,286 at 31 December 2023.

The net interest result in the unconsolidated profit and loss account decreased compared to the previous year. The interest income increased due to the combination of the increase in the return on cash and cash equivalents and securities portfolio and a higher outstanding mortgage portfolio. However, interest expenses increased more than the increase in interest income due to higher interest rates granted on savings and term accounts. Chapter 8.9. Discussion of consolidated financial statements includes a more detailed explanation of the change in the interest result.

It should also be noted that part of the income from the securitised loans (the so-called deferred selling price in these transactions) is included in the unconsolidated profit and loss account under “gains from financial transactions”.

	31/12/2023	31/12/2024
Interest income less interest expenses	744,636,190	708,976,611
Income from variable-yield securities	52,290,269	53,257,049
Commissions received less commissions paid	-29,944,235	-18,113,189
Gain (loss) on financial transactions	14,667,440	18,452,110
Depreciation and amortisation	-48,664,764	-48,001,409
Impairments on (credit) receivables	-5,516,003	-1,391,195
Impairments on investment portfolio	-412,430	848,503

In 2024, a dividend of EUR 52.8 million was received from subsidiary AAM (Argenta Asset Management) compared with EUR 51.8 million in 2023.

The amount of commissions fell. There is a continued base of fees received from the global portfolio funds with a positive contribution from current account fees as well. At the same time, there are the fees paid to independent branches for their service to and proximity to clients.

The result from financial transactions rose to EUR 18.4 million. This amount includes proceeds of EUR 11.1 million from the so-called deferred selling price of the securitisation transactions. These amounts are recorded as gains in the unconsolidated balance sheet but are actually interest income from the underlying loans of the transactions in question.

Depreciation and amortisation fell slightly from EUR 48.6 million to EUR 48.0 million, remaining at a high level due to the high rate of investment in recent years.

The amount of impairments fell from EUR 5.5 million to EUR 1.3 million due to lower loan provisions.

To view the global costs, the headings below have been combined in the financial statements. Personnel and other costs are passed on between group entities in Belgium via a cost sharing system, and are recorded under “other operating income” and “other operating expenses”.

	31/12/2023	31/12/2024
Salaries, social security charges and pensions	-104,728,278	-114,446,374
Other administrative expenses	-266,293,421	-236,898,547
Other operating income	73,750,132	100,016,606
Other operating expenses	-107,881,984	-113,785,860
	-405,153,552	**-365,114,175**

Taking these headings together, we observe an overall decrease in expenses by EUR 40 million. This change is mainly explained by the decrease in “other administrative expenses” (from EUR 266 million to EUR 236 million) and a refinement of the cost allocation between the Argenta Group entities.

Profit appropriation at the end of the financial year

It was proposed to the general meeting that the profit for the financial year of EUR 273,589,598 be appropriated as follows:

- to the legal reserve: EUR 7,012,462
- to other reserve: EUR 266,577,136
- distributed profits: EUR 101,385,000

No profit was distributed to the shareholders through the profit appropriation for the financial year.

In October 2024, an interim dividend of EUR 101,385,000 (EUR 600 per Argenta Spaarbank share) was paid. This was followed by a capital increase of EUR 70,124,625. The cash out was thus EUR 31,260,375.

Equity

After the aforementioned appropriation of profit, the accounting equity amounted to EUR 2,821,110,729 compared with EUR 2,578,781,506 as of 31 December 2023.

This gives a return on equity of 10.6% compared to 11.1% for the 2023 financial year.

The Tier 1 equity amounted to EUR 2,687,090,174 compared to EUR 2,462,747,671 as of 31 December 2023.

The main factor explaining the increase in Tier 1 equity is the allocation of the profit for the financial year to reserves minus the cash out of the interim dividend. Although no final dividend is envisaged, a theoretical dividend amount – calculated in accordance with ECB rules – was not included when calculating Tier 1 equity.

The Tier 1 ratio has fallen from 20.9% to 27.51% as of 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). The risk-weighted assets decreased in the course of 2024 as a result of the approved internal model for Dutch home loan portfolios, the application file for which was submitted in 2022. This led to a decrease in the risk-weighted assets by EUR 1.8 billion.

	31/12/2023	31/12/2024
Return on equity	11.14%	10.61%
CET-1 ratio	20.93%	27.51%

Discussion of the consolidated financial statements of Argenta Spaarbank

The consolidated financial statements for the 2024 financial year (1 January 2024 to 31 December 2024) of Argenta Spaarbank 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.

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 was further boosted 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 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.

In 2024, Argenta managed not to increase costs at group level, and the introduction of refined cost allocation between group entities also means fewer costs are allocated to Argenta Spaarbank.

Argenta Spaarbank's net profit increased by EUR 30 million to EUR 273 million. Most of the profits were also added to reserves in 2024, further growing equity, which supports the high capital ratios. All the solvency requirements were easily met. The liquidity ratios remained comfortable.

Key figures (unaudited)

The table below gives the key figures of Argenta Spaarbank nv, or Aspa for short (hereinafter the Company).

	31/12/2023	31/12/2024
Return on equity	9.8%	10.0%
Return on total assets	0.45%	0.49%
Cost/income ratio (excluding bank levies)	43.6%	39.3%
Cost/income ratio (including bank levies)	56.0%	51.7%
Common equity Tier 1 ratio	22.0%	28.9%
Total capital ratio	22.0%	28.9%
Leverage ratio	4.8%	5.1%
Liquidity coverage ratio	219%	197%
Net stable funding ratio	140%	145%
Minimum requirement for own funds and eligible liabilities (LRE) (Bank Pool)	8.7%	8.8%
Minimum requirement for own funds and eligible liabilities subordinated (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 subordinated (TREA) (Bank Pool)	39.5%	50.0%

In calculating the cost/income ratio, the amounts recovered under cost sharing arrangements with the other group companies – which are recognised under other operating income – are allocated to the relevant other administrative expenses and fee and commission expenses.

The return on equity is calculated by dividing the net profit by the equity available at the beginning of the financial year.

The Tier 1 ratio rose from 22.0% to 28.9% 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). The risk-weighted assets decreased in the course of 2024 as a result of the approved internal model for Dutch home loan portfolios, the application file for which was submitted in 2022. This led to a decrease in the risk-weighted assets by EUR 1.8 billion.

Evolution of the balance sheet

Total assets rose by 3.7% from EUR 53.8 billion as of 31 December 2023 to EUR 55.8 billion as of 31 December 2024.

Cash and balances with (central) banks rose by EUR 0.2 billion to EUR 2.4 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 0.3 billion compared to the end of 2023. This amount consists of i) a EUR 2.3 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	33,615,223	35,334,486
Financial assets at fair value through other comprehensive income	2,849,599,421	2,337,317,646
Financial assets at amortised cost – debt securities	7,090,119,165	7,313,499,803
Total securities portfolio	**9,973,333,810**	**9,686,151,934**

The portfolio of loans and advances increased from EUR 40.9 billion as of 31 December 2023 to EUR 43.0 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 41.2 billion as of 31 December 2024, compared to EUR 39.1 billion in 2023.

	31/12/2023	31/12/2024
Financial assets at amortised cost – loans and ad-vances	40,941,681,240	42,971,046,762
of which mortgage loans	39,099,706,812	41,152,569,722

Financial liabilities measured at amortised cost increased by EUR 1.7 billion to EUR 52.3 billion as of 31 December 2024.

Deposits from credit institutions fell further 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.

	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 insti-tutions	42,615,213,836	43,842,394,390
Senior debt securities issued	6,752,523,947	7,487,208,960
Subordinated debt securities issued	0	0
Other financial liabilities	85,677,345	91,903,666
Financial liabilities at amortised cost	**50,583,709,939**	**52,284,273,927**

The other financial liabilities include EUR 91.9 million of lease liabilities. The assets side of the balance sheet shows a similar increase for the assets related to these leases.

Result drivers

In 2024 the Company achieved a consolidated net profit (including minority interests) of EUR 273,096,104 for the 2024 financial year compared to EUR 242,602,414 for the previous financial year. This increase reflects an improvement in the result at Argenta Spaarbank (EUR +21.0 million) and an increase in the result of the two management companies (EUR +9.4 million).

The interest result as the main driver of the recurring operating result was supplemented to a significant degree by the net fee and commission income related to the provision and management of investment funds.

Net interest income fell from EUR 740.9 million to EUR 687.5 million. Interest income increased due to the combination of the increase in yields on the securities portfolio (EUR +47.9 million), a combination of the increase in yields and further growth of the mortgage portfolio (EUR +121.1 million) and the increase in interest income on consumer loans and term loans (EUR +9.4 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.

There was a positive change in the net interest result of hedging derivatives. 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 50.1 million in 2023 to EUR 75.1 million for financial year 2024. There was an increase in fees paid to independent branch managers (EUR +19.7 million) with a simultaneous increase in net management fees received (EUR +28.9 million) and transaction costs (EUR +9.3 million) on assets under management and custody in the Investment pillar. 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 5.2 million, which is an increase of EUR 6.0 million.

Net other operating income amounted to EUR 71.4 million and includes recoveries as a result of cost sharing with the other group companies, of recovery of administrative costs from customers, and of rent and IT infrastructure-related recoveries from the agents. As a result of updating the cost allocation, more costs were recharged to other group entities.

Staff expenses amounted to EUR 119.1 million for financial year 2024 compared to EUR 107.7 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.

Other administrative expenses fell from EUR 344.0 million in financial year 2023 to EUR 315.5 million in financial year 2024. Expenses for complying with all legal requirements and bank levies remained high at EUR 96.5 million (EUR -4.0 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 -22.6 million). There is also a general focus on cost control and efficiency, which resulted in decreased IT costs (EUR -6.0 million) and stable other costs, despite the inflationary environment.

Depreciation and amortisation remained virtually unchanged at EUR 23.8 million in 2024.

In 2024, there was a net reversal of impairments of EUR 1.8 million compared to net recognition of impairments totalling EUR 12.8 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 107.5 million. Deferred taxes are also included under this heading. In 2023, the effective tax rate was 28.6%, and in financial year 2024 it was 28.2%.

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.

Solid capital base and liquidity position (unaudited)

In the fourth quarter of 2024, an interim dividend of EUR 101.4 million was paid to the shareholders, followed by a capital increase of EUR 70.1 million. 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 28.9% as of 31 December 2024 compared with 22.0% 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 145% as of 31 December 2024 compared to 219% and 140%, respectively, as of 31 December 2023. Liquidity is further explained in Note 4.1.2.

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	2,152,396,828	2,389,807,691
Financial assets held for trading	8, 23	63,051,701	28,431,717
Non-trading financial assets mandatorily at fair value through profit or loss	9	33,615,223	35,334,486
Financial assets at fair value through other comprehensive income	10, 22	2,849,599,421	2,337,317,646
Financial assets at amortised cost	11	48,031,800,405	50,284,546,565
Derivatives used for hedging	12, 23	1,425,057,322	1,175,707,254
Fair value changes of the hedged items in portfolio hedge of interest rate risk	12	-1,245,442,292	-937,134,618
Investments in joint ventures and associates	13	56,700	63,628
Tangible assets	14, 21	63,485,946	66,541,521
Property, plant and equipment		63,176,917	66,241,196
Investment property		309,029	300,325
Intangible assets	15	23,126,581	19,887,034
Goodwill	15	0	0
Tax assets	16	98,581,382	103,019,394
Current tax assets		84,612,533	103,014,201
Deferred tax assets		13,968,849	5,193
Other assets	17	283,615,427	262,785,456
Total assets		**53,841,544,977**	**55,832,552,654**

Liabilities and equity	Note	31/12/2023	31/12/2024
Financial liabilities held for trading	8, 23	52,642,345	22,912,955
Financial liabilities at amortised cost	18, 22	50,583,709,939	52,284,273,927
Deposits from central banks		0	0
Deposits from credit institutions		1,130,294,811	862,766,910
Deposits from other counterparties than central banks and credit institutions		42,615,213,836	43,842,394,390
Senior debt securities issued		6,752,523,947	7,487,208,960
Subordinated debt securities issued		0	0
Other financial liabilities		85,677,345	91,903,666
Derivatives used for hedging	12, 23	242,563,369	316,370,716
Fair value changes of the hedged items in portfolio hedge of interest rate risk	12	0	0
Provisions	19	11,118,524	12,785,849
Tax liabilities	16	21,383,375	25,556,565
Current tax liabilities		4,189,420	6,770,591
Deferred tax liabilities		17,193,955	18,785,974
Other liabilities	20	200,023,990	186,679,984
Total liabilities		**51,111,441,542**	**52,848,579,997**
Equity attributable to the owners of the parent	2	2,729,607,715	2,983,394,682
Equity attributable to minority interests	3	495,720	577,975
Total equity		**2,730,103,435**	**2,983,972,657**
Total liabilities and equity		**53,841,544,977**	**55,832,552,654**

Consolidated statement of profit or loss

	Note	31/12/2023	31/12/2024
Total operating income		**828,791,579**	**837,752,770**
Net interest income	24	740,937,030	687,516,675
Interest income		1,322,582,331	1,570,210,325
Interest expenses		-581,645,301	-882,693,650
Dividend income	25	438,841	408,477
Net fee and commission income	26	50,088,141	75,059,372
Fee and commission income		248,697,432	298,633,639
Fee and commission expenses		-198,609,291	-223,574,268
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	27	-863,920	5,164,500
Financial assets at fair value through other comprehensive income		70,358	2,883,496
Financial assets and liabilities at amortised cost		-934,278	2,281,003
Gains or losses on financial assets and liabilities held for trading	28	-5,626,767	-2,121,663
Gains or losses on non-trading financial assets mandatorily at fair value through profit and loss	29	845,992	1,968,071
Gains or losses from hedge accounting	30	-5,634,523	-1,669,073
Gains or losses on the derecognition of non-financial assets	31	-363,084	-10,920
Net other operating income	32	48,969,870	71,437,332
Other operating income		64,308,478	87,941,375
Other operating expenses		-15,338,608	-16,504,042
Administrative expenses	33	**-451,693,708**	**-434,631,911**
Staff expenses		-107,675,308	-119,148,888
Other administrative expenses		-344,018,400	-315,483,023
Depreciation and amortisation	14, 15, 21	**-24,263,845**	**-23,811,025**
Property, plant and equipment		-12,828,863	-14,221,483
Investment property		-9,545	-9,509
Other intangible assets		-11,425,438	-9,580,034
Modification gains or losses		**0**	**0**
Provisions or reversal of provisions		**-91,581**	**-535,273**
Impairments or reversal of impairments	34	**-12,770,379**	**1,807,896**

	Note	31/12/2023	31/12/2024
Financial assets (debt securities) at fair value through other comprehensive income		33,408	1,284,595
Financial assets at amortised cost		-12,803,787	523,301
Goodwill		0	0
Property, plant and equipment		0	0
Share in results of associates and joint ventures		**9,822**	**6,928**
Profit or loss before tax		**339,981,889**	**380,589,385**
Tax expense	35	-97,379,475	-107,493,280
Profit or loss after tax		**242,602,414**	**273,096,104**
Profit or loss attributable to owners of the parent		242,261,320	272,697,092
Profit or loss attributable to minority interests		341,094	399,012

Consolidated statement of comprehensive income

Statement of profit or loss and other comprehensive income	Note	31/12/2023	31/12/2024
Profit or loss		**242,602,414**	**273,096,104**
Profit or loss attributable to owners of the parent		242,261,320	272,697,092
Profit or loss attributable to minority interests		341,094	399,012
Items that will not be reclassified to profit or loss		**-2,922,633**	**-3,587,792**
Equity instruments at fair value through other comprehensive income	10	601,210	-1,207,692
Valuation gains or losses taken to equity		607,006	-1,218,874
Deferred taxes		-5,797	11,182
Actuarial gains or losses on defined benefit pension plans	19	-3,523,842	-2,380,100
Gross actuarial gains or losses on defined benefit pension plans		-4,704,473	-3,179,531
Deferred taxes		1,180,630	799,432
Items that may be reclassified to profit or loss		**38,233,880**	**15,937,801**
Debt securities at fair value through other comprehensive income	10	38,233,880	15,937,801
Valuation gains or losses taken to equity		51,082,273	25,322,450
Transferred to profit or loss		-103,767	-4,072,049
Deferred taxes		-12,744,627	-5,312,600
Total other comprehensive income		**35,311,248**	**12,350,008**
Comprehensive income		**277,913,661**	**285,446,113**
Comprehensive income attributable to the owners of the parent		277,572,698	285,047,343
Comprehensive income attributable to minority interests		340,963	398,769

Consolidated statement of changes in equity

		Accumulated other comprehensive income							
	Paid up capital	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	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	**933,925,150**	**-63,559,993**	**-4,744,406**	**-1,602,769**	**1,409,161,162**	**195,753,375**			
Capital increase	76,038,750	0	0	0	0	0	76,038,750	0	76,038,750
Profit or loss	0	0	0	0	0	242,261,320	242,261,320	341,094	242,602,414
Dividends	0	0	0	0	-92,936,250	0	-92,936,250	-312,599	-93,248,849
Valuation gains or losses taken to other comprehensive income	0	51,082,273	607,006	-4,704,299	0	0	46,984,980	-174	46,984,806
Other comprehensive income transferred to profit or loss	0	-103,767	0	0	0	0	-103,767	0	-103,767
Changes in deferred taxes	0	-12,744,627	-5,797	1,180,587	0	0	-11,569,836	44	-11,569,792
Total other comprehensive income	**0**	**38,233,880**	**601,209**	**-3,523,712**	**0**	**0**	**35,311,377**	**-130**	**35,311,247**
Other changes	0	0	0	0	0	0	0	0	0
Transfer to reserves	0	0	0	0	195,753,375	-195,753,375	0	0	0
Equity position 31/12/2023	**1,009,963,900**	**-25,326,114**	**-4,143,197**	**-5,126,481**	**1,511,978,287**	**242,261,320**	**2,729,607,714**	**495,720**	**2,730,103,434**
Capital increase	70,124,625	0	0	0	0	0	70,124,625	0	70,124,625
Profit or loss	0	0	0	0	0	272,697,092	272,697,092	399,012	273,096,104
Dividends	0	0	0	0	-101,385,000	0	-101,385,000	-316,514	-101,701,514
Valuation gains or losses taken to other comprehensive income	0	25,322,450	-1,218,874	-3,179,208	0	0	20,924,367	-323	20,924,044
Other comprehensive income transferred to profit or loss	0	-4,072,049	0	0	0	0	-4,072,049	0	-4,072,049
Changes in deferred taxes	0	-5,312,600	11,182	799,350	0	0	-4,502,068	81	-4,501,987
Total other comprehensive income	**0**	**15,937,801**	**-1,207,692**	**-2,379,858**	**0**	**0**	**12,350,250**	**-242**	**12,350,008**
Other changes	0	0	0	0	0	0	0	0	0
Transfer to reserves	0	0	0	0	242,261,320	-242,261,320	0	0	0
Equity position 31/12/2024	**1,080,088,525**	**-9,388,313**	**-5,350,889**	**-7,506,339**	**1,652,854,607**	**272,697,092**	**2,983,394,682**	**577,975**	**2,983,972,657**

Consolidated cash flow statement

	31/12/2023	31/12/2024
Cash and cash equivalents at the start of the period	**3,288,565,687**	**2,343,477,102**
Operating activities		
Profit or loss before tax	339,981,889	380,589,385
Adjustments for:		
Depreciation and amortisation	17,211,190	16,055,240
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	12,770,379	-1,807,896
Changes in assets and liabilities from hedging derivatives and hedged items	61,340,654	55,730,737
Interest expenses from financing activities	137,606,465	147,001,629
Other adjustments	19,219,172	19,396,656
Cash flows from operating profits before changes in operating assets and liabilities	**588,584,414**	**617,511,944**
Changes in operating assets (excluding cash and cash equivalents)		
Financial assets held for trading	44,534,216	34,619,984
Financial assets at amortised cost	-1,942,241,422	-2,243,379,322
Financial assets at fair value through other comprehensive income	655,832,053	528,296,479
Non-trading financial assets mandatorily at fair value through profit or loss	-374,004	-1,719,262
Other assets	11,553,186	34,793,627
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	431,566,075	1,227,180,554
Debt securities issued, retail	0	0
Financial liabilities held for trading	-38,907,449	-29,729,390
Other liabilities	-2,261,632	-13,000,034
(Paid)/refunded income taxes	-139,723,122	-123,313,777
Net cash flow from operating activities	**-1,047,343,091**	**-236,267,097**
Investing activities		
Cash payments to acquire property, plant and equipment	-3,662,149	-5,640,747
Cash proceeds from disposal of property, plant and equipment	100,090	168,327

	31/12/2023	31/12/2024
Cash payments to acquire intangible assets	-4,526,517	-6,327,387
Cash proceeds from disposal of intangible assets	313,095	0
Changes concerning consolidated companies	0	0
Net cash flow from investing activities	**-7,775,481**	**-11,799,807**
Financing activities		
Dividends paid	-93,248,849	-101,701,514
Cash proceeds from a capital increase	76,038,750	70,124,625
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	-1,005,711,951
Interest expenses paid	-137,606,465	-147,001,629
Net cash flow from financing activities	110,029,987	496,216,056
Net cash flow from financing activities	**110,029,987**	**496,216,056**
Cash and cash equivalents at the end of the period	**2,343,477,102**	**2,591,626,254**
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	330,018,524	278,558,145
Other advances	0	0
Total cash and cash equivalents at the end of the period	**2,343,477,102**	**2,591,626,254**
Cash flow from operating activities:		
Interest income received	1,311,497,695	1,569,859,406
Dividends received	438,841	408,477
Interest expenses paid	-316,751,006	-680,446,697
Cash payments resulting from lease liabilities	-7,363,397	-8,139,589
Payments for leases that fall under the valuation exemptions for leases (low value and short term)	-239,658	-339,043
Cash flow from financing activities:		
Interest expenses paid	-137,606,465	-147,001,629

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 came into application during 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 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.

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).

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),.Please note that the Company has no goodwill at present;
- 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 employee pension liabilities (see the note on employee benefits – long-term benefits).

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 34 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:
- Activities in Belgium;
- Activities in the Netherlands;
- Activities in 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, minus 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 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. Realised and unrealised results as a result of remeasurement to fair value are 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 macro economic 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 stages 1 and 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 recognising the financial asset under default the status default no longer apply, the financial asset can be remediated if no new criteria for recognising the financial asset under default status are established during the probation period of at least 3 months. 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 make not 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 as 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 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 including transaction costs, paid or received commissions and fees , 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.

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 . 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 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 carryforward 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.

2. Equity attributable to the owners of the parent

The Company is the consolidating entity, with 99.99% of its shares owned by BVg. Equity including equity attributable to minority interests amounts to EUR 2,983,972,657 on 31 December 2024 compared to EUR 2,730,103,435 on 31 December 2023. The minority interests amount to EUR 577,975 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	1,009,963,900	1,080,088,525
Share premium	0	0
Accumulated fair value changes of debt securities measured at fair value through other comprehensive income	-25,326,114	-9,388,313
Accumulated fair value changes of equity instruments measured at fair value through other comprehensive income	-4,143,197	-5,350,889
Accumulated actuarial gains or losses on defined benefit pension plans	-5,126,481	-7,506,339
Reserves	1,511,978,287	1,652,854,607
Profit or loss attributable to owners of the parent	242,261,320	272,697,092
Minority interests	495,720	577,975
Total equity	**2,730,103,435**	**2,983,972,657**

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 share capital, represented by 168,975 shares (without par value), amounted to EUR 1,080,088,525 at 31 December 2024.

Capital increases in the Company

The increase in paid up capital is the result of a capital increase of EUR 70,124,625, which took place on 21 October 2024. This capital increase involved no issue of new shares and was subscribed by the present shareholders. In 2023, there was a capital increase at the Company of EUR 76,038,750.

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 -29,469,310 on 31 December 2023 to EUR -14,739,202 on31 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	-33,768,152	-4,072,049		25,322,450		-12,517,751
Deferred taxes	8,442,039				-5,312,600	3,129,439
Equity instruments at fair value through other comprehensive income						
Accumulated valuation gains or losses	-4,130,447		0	-1,218,874		-5,349,321
Deferred taxes	-12,750				11,182	-1,568
Accumulated other comprehensive income for debt securities and equity instruments	**-29,469,310**	**-4,072,049**	**0**	**24,103,576**	**-5,301,418**	**-14,739,202**

In the 2024 financial year a total of EUR 4,072,049 was recycled to profit or loss. Note 12 gives further information on the treatment of micro hedges.

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 19 gives further information on the treatment of pension obligations.

Reserves

The reserves (EUR 1,652,854,607 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 272,697,092, compared to EUR 242,261,320 for the previous financial year.

Dividends

In the fourth quarter of 2024, an interim dividend of EUR 101,385,000 (EUR 600 per share) was paid to shareholders. Subsequently a capital increase of EUR 70,124,625 in the Company took place, subscribed by the two shareholders.

A proposal will be made by the Company's Board of Directors to the General Meeting of shareholders of the Company that no additional dividend be declared in respect of the 2024 financial year.

3. Minority interests

In 2023, EUR 495,720 was attributable to minority interests, and EUR 577,975 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 in 2024 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. The Company has no trading book. This risk 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 12 and 23.

Sensitivity analysis – interest rate risk

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 represents the Company's 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. Consequently, there is 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.

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 Aspa's market value, CSRBB RAF limits were defined that reflect the impact of a shift to an extreme spread widening scenario (99.9% percentile) as a percentage of equity (T1 equity). The table below shows the latest figures:

	31/12/2023	31/12/2024
Impact on market value in % of equity	-22.58%	-14.10%
Impact on NII	-3,341,807	-4,465,110

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.

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 risks.

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. The Company holds limited equity positions in counterparties active in real estate operations.

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	0	0
Impact on equity	-1,143,072	-1,026,043

Equity instruments at fair value through other comprehensive income amount to EUR 10,260,435 (market value) on 31 December 2024. If the markets fall by 10%, the amount in equity will decrease by EUR 1,026,043 and no impairments will be recorded in IFRS. The company has no equity instruments measured at fair value through profit or loss.

Property risk

Exposure

The evolution of real estate prices influences retail lending and s 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 a the aim of future realisation. 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 34 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 300,325. At the end of 2023, the carrying amount was EUR 309,028. A decrease of 10% of the market value will, in the absence of a permanent impairment, have no impact on the result. The maximum risk of loss is EUR 300,325.

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.

Sources of liquidity

The Company'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 source of the Company's banking activities.

The Company 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 the 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 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.

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 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

The Company 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 the Company'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, the Company 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, the Company 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.

Maturity analysis

Notes 9, 10 and 11 contain additional information on the remaining term of the financial assets at fair value and 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.

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 for 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. The interest is calculated using the fixed and variable rates on 31 December 2024 for the respectively 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 maturity - there is a decrease and a shift in maturity 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.

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 two segments for credit risk: the retail market and in particular the retail mortgage lending market (in both Belgium and the Netherlands), and the investment portfolio along with the portfolio of loans to local and regional authorities and (selectively) to corporates. Credit risk management is therefore focused on these two 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)), and for climate risk indicators (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 actions.

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.

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 Company 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 Company 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	53,330,758,466	55,249,394,259
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	**56,588,610,773**	**58,811,376,085**

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 framework 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 the 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	1.08%	451,152,420	1.08%
Mortgage loans Belgium	18,455,071,966	46.48%	19,060,686,387	45.61%
Mortgage loans Netherlands	20,644,634,846	51.99%	22,091,883,335	52.86%
Term loans	175,050,112	0.44%	182,801,593	0.44%
Total	**39,705,631,860**	**100.00%**	**41,791,937,127**	**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 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	**2,838,168,702**	**100.00%**	**2,327,057,211**	**100.00%**
Debt securities				
Public and regional authorities	905,813,335	31.92%	685,599,203	29.46%
Credit institutions	604,567,536	21.30%	417,885,653	17.96%
Other financial institutions	501,824,026	17.68%	573,813,925	24.66%
Other institutions	825,963,806	29.10%	649,758,430	27.92%
Financial assets at amortised cost	**8,197,688,604**	**100.00%**	**8,357,035,755**	**100.00%**
Debt securities				
Public and regional authorities	1,519,393,617	18.53%	1,877,329,584	22.46%
Credit institutions	2,260,521,405	27.58%	2,161,526,896	25.86%
Other financial institutions	737,674,336	9.00%	762,173,660	9.12%
Other institutions	2,572,529,806	31.38%	2,512,469,662	30.06%
Term loans	1,067,127,712	13.02%	1,001,344,429	11.98%
Leasing	40,441,728	0.49%	42,191,523	0.50%
Non-trading financial assets mandatorily at fair value through profit or loss	**33,615,223**	**100.00%**	**35,334,486**	**100.00%**
Debt securities				
Public and regional authorities	0	0.00%	0	0.00%
Credit institutions	24,660,250	73.36%	24,332,641	68.86%
Other financial institutions	8,954,973	26.64%	11,001,845	31.14%
Other institutions	0	0.00%	0	0.00%

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		31/12/2023	31/12/2024
Belgium	26.79%	22.95%	Sweden	3.78%	3.51%
The Netherlands	17.15%	17.28%	Ireland	2.43%	2.49%
France	14.02%	15.21%	Slovakia	0.98%	1.66%
Germany	7.04%	6.22%	Denmark	1.58%	1.37%
Austria	3.77%	5.70%	Iceland	1.43%	1.15%
Spain	5.28%	5.33%	Poland	1.07%	1.11%
Luxembourg	5.11%	5.14%	United States of America	1.09%	1.00%
Finland	2.94%	3.81%	Other	5.54%	6.07%
			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 34 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 weightings.

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 34 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;
- Unlikeliness 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	**42,903,091,947**	**5,010,558,073**	**179,020,113**	**45,085,490,645**	**5,079,367,301**	**178,078,782**
Debt securities	7,016,036,309	90,248,021	0	7,245,546,643	87,319,188	0
Loans and advances	35,887,055,638	4,920,310,052	179,020,113	37,839,944,001	4,992,048,113	178,078,782
of which lease receivables	40,441,728	0	0	42,191,523	0	0
Financial assets at fair value through other comprehensive income	**2,840,104,368**	**0**	**0**	**2,327,708,282**	**0**	**0**
Debt securities	2,840,104,368	0	0	2,327,708,282	0	0
Equity instruments						
Total financial assets	**45,743,196,315**	**5,010,558,073**	**179,020,113**	**47,413,198,927**	**5,079,367,301**	**178,078,782**
Loan commitments, financial guarantees and other commitments	**2,422,063,746**	**81,597,664**	**0**	**3,659,484,235**	**81,129,312**	**0**
of which acquired financial assets with reduced creditworthiness	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	**908,790,318**	**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	859,336,515	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

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 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	**908,790,318**	**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	**2,168,987,807**	**1,919,804,506**	**43,973,019**	**33,074,235**	**19,125,998**	**521,984**
Debt securities	0	0	0	0	0	0
Loans and advances	2,168,987,807	1,919,804,506	43,973,019	33,074,235	19,125,998	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	**2,168,987,807**	**1,919,804,506**	**43,973,019**	**33,074,235**	**19,125,998**	**521,984**
Loan commitments, financial guarantees and other commitments	**5,118,423**	**15,525,413**	**0**	**0**	**0**	**0**

The carrying amount of loans and advances in stage 2 increased slightly from EUR 4,920,310,052 to EUR 4,992,048,113 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 2,168,987,807 and from stage 2 to stage 1 of EUR 1,919,804,506.

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	**-11,692,607**	**-2,565,054**	**2,149,734**	**-1,321,758**	**-112,537**		**-84,258**	**-13,626,481**
Debt securities	-6,472,051	-677,719	236,575	-652,583	0		0	-7,565,778
Loans and advances	-5,220,556	-1,887,335	1,913,158	-669,176	-112,537		-84,258	-6,060,703
Stage 2	**-16,279,521**	**0**	**6,862,413**	**-12,686,399**	**237,412**		**-831,989**	**-22,698,084**
Debt securities	-1,621,119	0	0	-8,913,933	0		0	-10,535,053
Loans and advances	-14,658,401	0	6,862,413	-3,772,466	237,412		-831,989	-12,163,031
Stage 3	**-25,131,645**	**0**	**5,412,479**	**-11,208,249**	**0**	**4,446,588**	**0**	**-26,480,827**
Debt securities	0	0	0	0	0	0	0	0
Loans and advances	-25,131,645	0	5,412,479	-11,208,249	0	4,446,588	0	-26,480,827
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	-775,669	-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	-333,374
Stage 3	0	0	0	0	0	0	0	0
Total	**-54,441,970**	**-4,565,550**	**16,752,157**	**-25,202,971**	**99,969**	**4,446,588**	**-930,055**	**-63,841,832**

	01/01/2024	Origination and acquisition	Derecognition	Changes to the credit risk	Changes due to update of the methodology for estimation	Write-offs	Other	31/12/2024
Stage 1	**-13,626,481**	**-2,278,509**	**1,805,725**	**6,284,502**	**1,755,587**		**0**	**-6,059,177**
Debt securities	-7,565,778	-744,884	366,130	4,558,747	0		0	-3,385,786
Loans and advances	-6,060,703	-1,533,625	1,439,595	1,725,755	1,755,587		0	-2,673,392
Stage 2	**-22,698,084**	**0**	**5,066,100**	**-9,029,492**	**-2,696,673**		**-16,351**	**-29,374,500**
Debt securities	-10,535,053	0	8,132	-6,104,394	0		0	-16,631,314
Loans and advances	-12,163,031	0	5,057,968	-2,925,098	-2,696,673		-16,351	-12,743,186
Stage 3	**-26,480,827**	**0**	**2,813,035**	**-6,812,462**	**3,200,027**	**3,672,671**	**0**	**-23,607,555**
Debt securities	0	0	0	0	0	0	0	0
Loans and advances	-26,480,827	0	2,813,035	-6,812,462	3,200,027	3,672,671	0	-23,607,555
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	-333,374	0	246,772	-201,347	-33,775		-40	-321,764
Stage 3	0	0	0	0	0	0	0	0
Total	**-63,841,832**	**-3,852,216**	**11,564,477**	**-9,488,756**	**1,515,877**	**3,672,671**	**-16,391**	**-60,446,170**

The receivables in stage 3 amounting to EUR 178,078,782, and EUR 23,607,555 of impairments have been recorded on 31 December 2024 (13.3% 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 to adjustments in 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	228,454,276	194,081,641
Performing exposures with forbearance measures	169,824,009	142,934,847
Non-performing exposures with forbearance measures	58,630,267	51,146,794
Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions	5,496,836	4,693,939
Collateral and financial guarantees received	200,133,385	169,117,114

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.

4.2. 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 the 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.

Second-line independent control is carried out by various types of assurance assignments (monitoring, domain investigations and special investigations). The special investigations can also take place within 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	3,636,125
Financial assets at amortised cost	0	22,352	0	0	5,364,515
Other assets	2,606,045	0	0	0	11,520,002
Total assets	**2,606,045**	**22,352**	**0**	**0**	**20,520,641**
Financial liabilities at amortised cost	91,874,394	1,415,892	1,713,984	0	194,456,008
Other liabilities	1,660,132	0	0	0	14,175,035
Total liabilities	**93,534,526**	**1,415,892**	**1,713,984**	**0**	**208,631,043**
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	3,615,125
Financial assets at amortised cost		19,969	0		5,023,318
Other assets	2,346,014	0	0	0	15,203,335
Total assets	**2,346,014**	**19,969**	**0**	**0**	**23,841,777**
Financial liabilities at amortised cost	89,472,284	1,475,423	1,296,244	0	156,446,787
Other liabilities	1,540,668	0	0	0	11,963,566
Total liabilities	**91,012,952**	**1,475,423**	**1,296,244**	**0**	**168,410,353**
Loan commitments	0	30,000	0	0	240,000
Total off-balance sheet	**0**	**30,000**	**0**	**0**	**240,000**

As explained, the majority shareholder (direct parent) of the Company is BVg. The ultimate parent is the holding company Investeringsmaatschappij Argenta (hereinafter Investar). The “Parent company” column contains the data of both holding companies.

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 Argenta Assuranties and Vestar) and the associated participating interests of the other companies that are members of the Argenta Group (Epico).

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 Aras and Vestar, which also declined in 2024 due to a decrease in balances on term accounts. The other liabilities are cost-sharing liabilities. The financial liabilities at amortised cost towards joint ventures represent the lease liabilities to Jofico for the Company’s ATMs.

Statement of profit or loss 31/12/2023	Parent company	Key management personnel	Subsidiaries	Joint ventures	Associates	Other related parties
Interest expenses	2,276,089	3,303	0	10,963	0	818,001
Fee and commission expenses	0	0	0	0	0	21,349,761
Losses on financial assets and liabilities at amortised cost	0	0	0	0	0	847,338
Other operating expenses	14,147,705	0	0	0	0	0
General and administrative expenses	1,992,795	0	0	1,021,916	0	198,843
Total expenses	**18,416,589**	**3,303**	**0**	**1,032,880**	**0**	**23,213,943**
Interest income	0	510	0	0	0	278,462
Fee and commission income	0	0	0	0	0	500,335
Other operating income	512,402	278	0	0	0	46,486,268
Total income	**512,402**	**789**	**0**	**0**	**0**	**47,265,065**

Statement of profit or loss 31/12/2024	Parent company	Key management personnel	Subsidiaries	Joint ventures	Associates	Other related parties
Interest expenses	1,354,619	34,873	0	9,236	0	572,468
Fee and commission expenses	0	0		0	0	23,168,660
Losses on financial assets and liabilities at amortised cost	0	0	0	0	0	0
Other operating expenses	15,321,545	0	0	0	0	0
General and administrative expenses	1,753,213	0	0	1,067,743	0	64,250
Total expenses	**18,429,377**	**34,873**	**0**	**1,076,979**	**0**	**23,805,377**
Interest income	0	432	0	0	0	391,291
Fee and commission income	0	0	0	0	0	488,236
Income from financial assets and liabilities at amortised cost	0	0	0	0	0	2,088,113
Other operating income	449,347	278	0	19,127	0	72,188,060
Total income	**449,347**	**710**	**0**	**19,127**	**0**	**75,155,700**

Other operating income and expenses relate to cost sharing between Aspa, Aras and BVg. As a result of introducing refined cost allocation, more costs are allocated to the insurer Argenta Assurantiess, which explains the increase in other operating income.

Impairments of EUR 1,485 were recognised in 2024 on balance sheet items involving related parties.

Note on credit transfers 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 are randomly selected from recent new production of (according to Aras's risk appetite) eligible loans. After selection, they are immediately transferred.

In this way, the Company 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 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 fall under the general segment of retail banking. Until further notice, this is treated in the internal reporting as a single operating segment. The ultimate chief operating decision maker (CODM) is the Executive Committee of the Company.

Information on products and services

The Company operates under the general segment of retail banking. In the consolidated internal reporting this is treated as a single operating segment.

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.

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.

	Belgium	The Netherlands	Luxembourg	31/12/2023
Cash and cash equivalents	62,600,304	0	28	62,600,333
Cash balances at central banks and other demand deposits	1,929,288,493	220,331,011	2,777,324	2,152,396,828
Financial assets held for trading	10,261,279	52,790,422	0	63,051,701
Non-trading financial assets mandatorily at fair value through profit or loss	33,615,223	0	0	33,615,223
Financial assets at fair value through other comprehensive income	2,849,599,421	0	0	2,849,599,421
Financial assets at amortised cost	27,385,109,438	20,644,634,846	2,056,122	48,031,800,406
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
Investments in joint ventures and associates	56,700	0	0	56,700
Tangible assets	62,537,094	948,852	0	63,485,946
Intangible assets	23,113,785	0	12,797	23,126,581
Goodwill	0	0	0	0
Tax assets	36,438,090	62,143,292	0	98,581,382
Other assets	138,060,730	131,744,284	13,810,413	283,615,427
Total assets	**32,712,350,705**	**21,110,537,589**	**18,656,683**	**53,841,544,977**

	Belgium	The Netherlands	Luxembourg	31/12/2024
Cash and cash equivalents	66,244,852	0	28	66,244,880
Cash balances at central banks and other demand deposits	2,223,122,928	164,396,698	2,288,064	2,389,807,691
Financial assets held for trading	5,490,663	22,941,054	0	28,431,717
Non-trading financial assets mandatorily at fair value through profit or loss	35,334,486	0	0	35,334,486
Financial assets at fair value through other comprehensive income	2,337,317,646	0	0	2,337,317,646
Financial assets at amortised cost	28,190,538,445	22,091,883,335	2,124,785	50,284,546,565
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
Investments in joint ventures and associates	63,628	0	0	63,628
Tangible assets	66,053,804	487,718	0	66,541,521
Intangible assets	19,887,034	0	0	19,887,034
Goodwill	0	0	0	0
Tax assets	13,837,398	89,181,996	0	103,019,394
Other assets	146,201,939	99,991,197	16,592,320	262,785,456
Total assets	**33,342,665,459**	**22,468,881,998**	**21,005,197**	**55,832,552,654**

	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)	0	0	0	0
Financial liabilities at amortised cost	45,669,260,892	4,914,449,047	0	50,583,709,939
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
Provisions	9,715,680	1,402,843	0	11,118,524
Tax liabilities	1,351,126	17,193,955	2,838,294	21,383,375
Other liabilities	155,691,223	42,100,536	2,232,232	200,023,990
Total liabilities	**46,078,582,291**	**5,027,788,725**	**5,070,526**	**51,111,441,542**

	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)	0	0	0	0
Financial liabilities at amortised cost	47,394,934,374	4,889,339,552	0	52,284,273,927
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
Provisions	11,855,141	930,708	0	12,785,849
Tax liabilities	2,710,293	16,212,122	6,634,150	25,556,565
Other liabilities	146,837,931	37,691,368	2,150,685	186,679,984
Total liabilities	**47,872,708,456**	**4,967,086,706**	**8,784,835**	**52,848,579,997**

	Belgium	The Netherlands	Luxembourg	Conso	31/12/2023
Net interest income	501,083,833	239,790,821	62,375	0	740,937,030
Dividend income	438,841	0	0	0	438,841
Net fee and commission income	-21,353,251	2,247,589	70,444,242	-1,250,438	50,088,141
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	-16,582	-847,338	0	0	-863,920
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	845,992	0	0	0	845,992
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
Net other operating income	127,329,077	-78,113,638	-99,100	-146,469	48,969,870
Administrative expenses	-399,083,415	-48,689,111	-5,318,090	1,396,908	-451,693,708
Depreciation and amortisation	-23,885,290	-376,717	-1,839	0	-24,263,845
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	-14,028,497	1,258,118	0	0	-12,770,379
Share in results of associates and joint ventures	9,822	0	0	0	9,822
Profit or loss before tax	**159,484,135**	**115,410,165**	**65,087,588**	**0**	**339,981,889**
Tax expense	-50,089,586	-31,058,232	-16,231,657	0	-97,379,475
Profit or loss after tax	**109,394,550**	**84,351,933**	**48,855,931**	**0**	**242,602,414**

	Belgium	The Netherlands	Luxembourg	Conso	31/12/2024
Net interest income	513,204,085	174,228,774	83,817	0	687,516,675
Dividend income	408,477	0	0	0	408,477
Net fee and commission income	-7,836,090	2,041,019	81,764,294	-909,852	75,059,372
Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss	3,076,387	2,088,113	0	0	5,164,500
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	1,968,071	0	0	0	1,968,071
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
Net other operating income	117,292,988	-45,598,300	-115,970	-141,386	71,437,332
Administrative expenses	-383,099,050	-46,897,366	-5,686,734	1,051,238	-434,631,911
Depreciation and amortisation	-23,363,444	-434,785	-12,797	0	-23,811,025
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	-59,759	1,867,655	0	0	1,807,896
Share in results of associates and joint ventures	6,928	0	0	0	6,928
Profit or loss before tax	**216,704,864**	**87,851,910**	**76,032,611**	**0**	**380,589,385**
Tax expense	-62,086,454	-26,445,475	-18,961,352	0	-107,493,280
Profit or loss after tax	**154,618,410**	**61,406,436**	**57,071,259**	**0**	**273,096,104**

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 of from asset management activities performed in Luxembourg to 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		**828,791,579**	**339,981,889**	**-79,513,593**	**-17,865,882**	**-97,379,475**	**0**	**911**
Belgium	Bank	595,314,955	159,484,125	-30,992,101	-19,097,485	-50,089,586	0	827
The Netherlands	Bank	163,069,107	115,410,175	-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		**828,791,579**	**339,981,889**	**-79,513,593**	**-17,865,882**	**-97,379,475**	**0**	**911**

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		**837,752,770**	**380,589,385**	**-96,439,594**	**-11,053,686**	**-107,493,280**	**0**	**970**
Belgium	Bank	623,354,576	216,704,854	-50,197,635	-11,888,819	-62,086,454	0	882
The Netherlands	Bank	132,666,052	87,851,920	-27,280,608	835,133	-26,445,475	0	73
Luxembourg	Other financial services	81,732,141	76,032,611	-18,961,352	0	-18,961,352	0	15
Third country		**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total		**837,752,770**	**380,589,385**	**-96,439,594**	**-11,053,686**	**-107,493,280**	**0**	**970**

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	201,538,583	142,984,462
Total	**2,214,997,160**	**2,456,052,571**

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:

			31/12/2023			31/12/2024
Financial assets	**Number**	**Notional**	**Carrying amount**	**Number**	**Notional**	**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**

			31/12/2023			31/12/2024
Financial liabilities	**Number**	**Notional**	**Carrying amount**	**Number**	**Notional**	**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. Non-trading financial assets mandatorily at fair value through profit or loss

In the context of 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. On 31 December 2024, there was EUR 35,334,486 under this classification.

	31/12/2023	31/12/2024
Total portfolio	**33,615,223**	**35,334,486**
Breakdown by instrument type		
Variable-income securities	0	0
Fixed-income securities	33,615,223	35,334,486
Loans and advances	0	0
Breakdown by interest rate type		
Variable	26,511,850	25,801,027
Fixed	7,103,373	9,533,458
Undefined	0	0
Geographical breakdown		
Belgium	4,740,447	5,011,847

	31/12/2023	31/12/2024
European Monetary Union	28,874,776	30,322,638
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	33,615,223	35,334,486
Undefined	0	0
Breakdown by counterparty		
Public and regional authorities	0	0
Credit institutions	24,660,250	24,332,641
Other financial institutions	8,954,973	11,001,845
Other institutions	0	0
Effective interest rate at 31/12	**2.74%**	**2.67%**

10. Financial assets at fair value through other comprehensive income

Financial assets at fair value through other comprehensive income included EUR 2,337,317,646 in instruments on 31 December 2024.

	31/12/2023	31/12/2024
Total portfolio	**2,849,599,421**	**2,337,317,646**
of which hedged via micro-hedges	830,239,518	568,255,270
Breakdown by instrument type		
Equity instruments	11,430,719	10,260,435
Debt securities	2,838,168,702	2,327,057,211
Breakdown by interest rate type		
Variable	746,610,931	763,074,706
Fixed	2,091,557,772	1,563,982,505
Undefined	11,430,719	10,260,435
Geographical breakdown		
Belgium	531,023,311	254,185,202
European Monetary Union	1,883,163,651	1,765,501,338
Rest of the world	435,412,459	317,631,105
Breakdown by residual term or maturity		
Up to 1 year	707,760,701	515,702,710
1 to 5 years	1,315,079,142	1,061,878,654
More than 5 years	815,328,860	749,475,847

	31/12/2023	31/12/2024
Undefined	11,430,719	10,260,435
Breakdown by counterparty		
Public and regional authorities	905,813,335	685,599,203
Credit institutions	604,567,536	417,885,653
Other financial institutions	513,254,745	584,074,360
Other institutions	825,963,806	649,758,430
Breakdown by impairment stage (gross carrying amount)		
Debt securities		
Stage 1	2,838,168,702	2,327,057,211
Stage 2	0	0
Stage 3	0	0
Breakdown by impairment stage (impairment)		
Debt securities		
Stage 1	-1,935,666	-651,071
Stage 2	0	0
Stage 3	0	0
Effective interest rate at 31/12	**1.77%**	**1.83%**

In the past years, no individual (stage 3) impairments were recorded on this portfolio.

On 31 December 2023, there were a total of EUR 1,935,666 of stage 1 impairments. This changed during 2024 to EUR 651,071. Further information on the changes in impairments is included in Note 34.

The securities involved are all recognised in the balance sheet as financial assets at fair value through other comprehensive income. Note 22 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 its full 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), along with equity instruments of companies with which it pursues long-term relationships. In 2023 and 2024, no positions were realised and therefore no valuation gains were transferred to reserves. EUR 408,477 of dividends were received in 2024.

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 36.

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	940,290,836	-33,873,251	-604,251	905,813,334
Credit institutions	617,972,074	-13,049,096	-355,442	604,567,536
Other financial institutions	503,981,073	-2,072,117	-84,929	501,824,026
Other institutions	851,541,712	-24,686,863	-891,044	825,963,806
Equity instruments				
Shares and others	15,561,165	-4,130,446		11,430,719
Total	**2,929,346,860**	**-77,811,773**	**-1,935,666**	**2,849,599,421**

31/12/2024	Amortised cost	Accumulated fair value changes	Accumulated impairments	Fair value
Debt securities				
Public and regional authorities	707,579,939	-21,750,338	-230,398	685,599,203
Credit institutions	421,178,429	-3,199,883	-92,893	417,885,653
Other financial institutions	575,290,419	-1,441,251	-35,243	573,813,925
Other institutions	660,964,291	-10,913,324	-292,537	649,758,430
Equity instruments				
Shares and others	15,609,755	-5,349,321		10,260,435
Total	**2,380,622,834**	**-42,654,117**	**-651,071**	**2,337,317,646**

11. Financial assets at amortised cost

A distinction is made between “loans and advances” and debt securities.

	31/12/2023	31/12/2024
Total portfolio	**48,031,800,405**	**50,284,546,565**
Breakdown by instrument type		
Loans and advances	40,941,681,240	42,971,046,762
Debt securities	7,090,119,165	7,313,499,803
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	39,099,706,812	41,152,569,722
Term loans	1,242,177,824	1,184,146,023
Advances and overdrafts	3,059,280	5,413,392
Leasing	40,441,728	42,191,523

	31/12/2023	31/12/2024
Debt securities	7,090,119,165	7,313,499,803
Breakdown of debt securities by interest rate type		
Variable	308,533,343	278,905,225
Fixed	6,781,585,822	7,034,594,577
Geographical breakdown of debt securities		
Belgium	2,136,488,477	1,964,269,622
European Monetary Union	4,124,025,357	4,473,573,787
Rest of the world	829,605,331	875,656,394
Breakdown by residual term by latest maturity date		
Debt securities		
Up to 1 year	1,021,014,528	1,130,404,869
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	1,902,938,691	2,122,857,437
1 to 5 years	6,965,765,218	7,276,572,974
More than 5 years	32,072,977,331	33,571,616,351
Breakdown of debt securities by counterparty		
Public and regional authorities	1,519,393,617	1,877,329,584
Credit institutions	2,260,521,405	2,161,526,896
Other financial institutions	737,674,336	762,173,660
Other institutions	2,572,529,806	2,512,469,662
Breakdown by impairment stage (gross carrying amount)		
Debt securities		
Stage 1	7,016,036,309	7,245,546,643
Stage 2	90,248,021	87,319,188
Stage 3	0	0
Loans and advances		
Stage 1	35,887,055,638	37,839,944,001
Stage 2	4,920,310,052	4,992,048,113
Stage 3	179,020,113	178,078,782
Breakdown by impairment stage (impairment)		
Debt securities		
Stage 1	-5,630,112	-2,734,714
Stage 2	-10,535,053	-16,631,315
Stage 3	0	0
Loans and advances		
Stage 1	-6,060,704	-2,673,393

	31/12/2023	31/12/2024
Stage 2	-12,163,032	-12,743,186
Stage 3	-26,480,827	-23,607,555

Effective interest rate debt securities as at 31/12	**2.30%**	**2.34%**
Effective interest rate loans and advances as at 31/12	**2.19%**	**2.35%**

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 2,673,393 of stage 1 and EUR 12,743,186 of stage 2 impairments. The amount of stage 3 individual impairments had fallen to EUR 23,607,555. Further information on the changes in impairments is included in Note 34.

For debt securities, stage 1 impairments decreased to EUR 2,734,714 and stage 2 impairments rose to EUR 16,631,315. There are no individual impairments (stage 3) for this portfolio.

12. 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 Company 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 recognised in a separate line in equity, but is recognised in the statement of profit or loss under 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 30.

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

13. Investments in associates and joint ventures

The investments in associates and joint ventures relate to a 20.00% participation in Jofico. 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	0	0
of which not individually material	56,700	63,628
Total	**56,700**	**63,628**

The Company revalued its participation in Jofico on 31 December 2024, based on Jofico's audited financial statements, by EUR 6,928.

	31/12/2023	31/12/2024
Share of investments in associates that are not individually material	56,700	63,628
Profit before taxes	9,822	6,928
Net profit	9,822	6,928
Other comprehensive income	0	0
Total impact of the comprehensive income	**9,822**	**6,928**

14. 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	63,176,917	66,241,196
Investment property	309,029	300,325
Total	**63,485,946**	**66,541,521**
Fair value of investment properties	**309,028**	**300,325**

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**	**22,170,065**	**6,158,744**	**22,360,125**	**5,648,992**	**114,630,231**	**384,757**
Leasing additions and write-offs	-2,769,568	0	-15,592	0	-273,088	-3,058,248	0
Acquisitions	0	2,996,008	0	666,141	0	3,662,149	0
Disposals	0	-4,644,888	0	-920,006	0	-5,564,894	-6,547
Transfers	0	0	0	0	0	0	0
Other changes	0	0	0	54,940	0	54,940	0
Acquisition value at 31 December 2023	**55,522,737**	**20,521,186**	**6,143,152**	**22,161,199**	**5,375,904**	**109,724,178**	**378,210**
Accumulated depreciation and impairment losses at 1 January 2023	**-10,491,041**	**-14,891,789**	**-3,417,736**	**-7,759,128**	**-3,686,693**	**-40,246,387**	**-60,784**
Leasing additions and write-offs	320,570	0	33,833	0	1,066,468	1,420,871	0
Acquisitions	0	0	0	0	0	0	0
Disposals	0	4,292,513	0	814,606		5,107,119	1,148
Depreciation	-4,541,014	-3,725,292	-1,043,847	-2,050,916	-1,467,794	-12,828,863	-9,545
Transfers	0	0	0	0	0	0	0
Other changes	0	0	0	0	0	0	0
Accumulated depreciation and impairment losses at 31 December 2023	**-14,711,485**	**-14,324,569**	**-4,427,750**	**-8,995,437**	**-4,088,019**	**-46,547,260**	**-69,180**
Net carrying amount at 31 December 2023	**40,811,252**	**6,196,617**	**1,715,402**	**13,165,762**	**1,287,885**	**63,176,917**	**309,028**

	Property (leasing)	IT	IT (leasing)	Other equipment	Other equipment (leasing)	Total	Investment property
Acquisition value at 1 January 2024	**55,522,737**	**20,521,186**	**6,143,152**	**22,161,199**	**5,375,904**	**109,724,178**	**378,210**
Leasing additions and write-offs	3,241,524	0	-3,152,419	0	5,313,283	5,402,388	0
Acquisitions	0	5,239,356	0	401,391	0	5,640,747	0
Disposals	0	-182,662	0	-1,954,998	0	-2,137,660	0
Transfers	0	0	0	0	0	0	0
Other changes	0	-59,043	0	-124,554	0	-183,597	0
Acquisition value at 31 December 2024	**58,764,261**	**25,518,837**	**2,990,733**	**20,483,038**	**10,689,187**	**118,446,055**	**378,210**
Accumulated depreciation and impairment losses at 1 January 2024	**-14.711.485**	**-14.324.569**	**-4.427.750**	**-8.995.437**	**-4.088.019**	**-46.547.260**	**-69.180**
Leasing additions and write-offs	1,440,108	0	3,153,921	0	1,921,574	6,515,603	0
Acquisitions	0	0	0	0	0	0	0
Disposals	0	156,094	0	1,802,320	0	1,958,413	0
Depreciation	-5,031,659	-4,022,827	-423,244	-2,442,870	-2,301,687	-14,222,288	-8,704
Transfers	0	0	0	0	0	0	0
Other changes	0	0	0	90,671	0	90,671	0
Accumulated depreciation and impairment losses at 31 December 2024	**-18,303,036**	**-18,191,303**	**-1,697,073**	**-9,545,317**	**-4,468,131**	**-52,204,860**	**-77,884**
Net carrying amount at 31 December 2024	**40,461,225**	**7,327,534**	**1,293,660**	**10,937,721**	**6,221,055**	**66,241,195**	**300,325**

15. 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	**17,562,011**	**119,239,261**	**0**	**136,801,272**
Leasing additions and write-offs	0	0	0	0
Acquisitions	528,802	3,997,715	0	4,526,517
Disposals	-42,562	-48,609,666	0	-48,652,228
Transfers	0	0	0	0
Other changes	0	0	0	0
Acquisition value at 31 December 2023	**18,048,251**	**74,627,310**	**0**	**92,675,561**
Accumulated amortisation and impairment losses at 1 January 2023	**-14,101,495**	**-92,361,179**	**0**	**-106,462,675**
Leasing additions and write-offs	0	0	0	0
Acquisitions	0	0	0	0
Disposals	9,949	48,329,184	0	48,339,133
Amortisation	-1,057,422	-10,368,016	0	-11,425,438
Transfers	0	0	0	0
Other changes	0	0	0	0
Accumulated amortisation and impairment losses at 31 December 2023	**-15,148,968**	**-54,400,011**	**0**	**-69,548,980**
Net carrying amount at 31 December 2023	**2,899,282**	**20,227,299**	**0**	**23,126,581**

	Purchased software	Developed software	Goodwill	Total
Acquisition value at 1 January 2024	**18,048,251**	**74,627,310**	**0**	**92,675,561**
Leasing additions and write-offs	0	0	0	0
Acquisitions	103,391	6,223,996	0	6,327,387
Disposals	-5,039	-28,191,325	0	-28,196,364
Transfers	0	0	0	0
Other changes	33,895	0	0	33,895
Acquisition value at 31 December 2024	**18,180,497**	**52,659,982**	**0**	**70,840,479**
Accumulated amortisation and impairment losses at 1 January 2024	**-15,148,968**	**-54,400,011**	**0**	**-69,548,980**
Leasing additions and write-offs	0	0	0	0
Acquisitions	0	0	0	0
Disposals	5,039	28,191,325	0	28,196,364
Amortisation	-1,038,943	-8,541,091	0	-9,580,034
Transfers	0	0	0	0
Other changes	-20,795	0	0	-20,795
Accumulated amortisation and impairment losses at 31 December 2024	**-16,203,667**	**-34,749,777**	**0**	**-50,953,445**
Net carrying amount at 31 December 2024	**1,976,830**	**17,910,204**	**0**	**19,887,034**

The amortisation of EUR 9,580,034 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.

16. Tax assets and liabilities

The tax position can be summarised as follows:

	31/12/2023	31/12/2024
Current tax assets	84,612,533	103,014,201
Deferred tax assets	13,968,849	5,193
Total tax assets	**98,581,381**	**103,019,394**
Current tax liabilities	4,189,420	6,770,591
Deferred tax liabilities	17,193,955	18,785,974
Total tax liabilities	**21,383,375**	**25,556,565**
Total globalised deferred taxes	**-3,225,106**	**-18,780,781**

The breakdown of the deferred taxes can be found in the table below.

Deferred taxes by type	31/12/2022	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
DRD and fiscal losses	30,884,099	0	-19,305,116	11,578,984	0	-11,578,983	0
Tax liabilities on financial instruments at fair value	22,320,066	-12,750,423	-211,498	9,358,145	-5,301,418	-492,018	3,564,709
Tax assets on other items	9,528,842	1,180,631	1,207,677	11,917,150	799,431	-1,003,143	11,713,438
Total decompensated tax assets	**62,733,007**	**-11,569,793**	**-18,308,936**	**32,854,278**	**-4,501,987**	**-13,074,144**	**15,278,147**
Tax liabilities on financial instruments at fair value	0	0	0	0	0	0	0
Tax liabilities on financial instruments at amortised cost	23,339,044	0	2,852,428	26,191,472	0	2,598,295	28,789,767
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	0	0	0	0	0	0	0
Tax liabilities on other items	0	0	0	0	0	0	0
Total decompensated tax liabilities	**36,522,443**	**0**	**-443,055**	**36,079,388**	**0**	**-2,020,458**	**34,058,930**
Compensated tax assets	**26,210,565**	**-11,569,793**	**-17,865,881**	**-3,225,110**	**-4,501,987**	**-11,053,686**	**-18,780,783**

The main items in 2024 were a deferred tax liability of EUR 28,789,767 on the measurement at amortised cost (with the effective interest rate) and a tax asset of EUR 11,713,438 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 fall in the tax asset relating to tax loss carry forwards is the result of using the transferred DRD 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 35 provides further information of the impact of corporate taxes on the Company's result.

17. Other assets

An overview of the other assets can be found in the table below:

	31/12/2023	31/12/2024
Prepaid expenses	12,416,148	15,443,458
Other assets in the context of lending transactions	104,292,138	76,921,312
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	92,743,255	88,894,287
Total other assets	**283,615,427**	**262,785,456**

“Other assets in the context of lending transactions” relate to credit advances to notary accounts and to the external servicer 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.

18. 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	42,615,213,836	43,842,394,390
Senior debt securities issued	6,752,523,947	7,487,208,960
Subordinated debt securities issued	0	0
Other financial liabilities	85,677,345	91,903,666
Total	**50,583,709,939**	**52,284,273,927**

18.1. Deposits from central banks

The Company has no deposits from central banks.

18.2. 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.

18.3. Deposits from other than central banks and credit institutions

Deposits from sources other than central banks and credit institutions – essentially deposits from the Company's retail customers – break down as follows:

	31/12/2023	31/12/2024
Deposits from other than central banks and credit institutions	**42,615,213,836**	**43,842,394,390**
Breakdown by product type		
Deposits on demand	6,190,831,694	6,500,851,431
Fixed-term deposits	8,417,221,745	6,893,070,289
Regulated savings deposits	24,767,331,301	27,275,465,778
Mortgage-linked deposits	621,230,799	685,366,597
Cash collateral	109,204,000	56,005,000
Other deposits	2,509,394,296	2,431,635,295
Breakdown by residual term or maturity		
Up to 1 year	6,705,498,558	2,235,796,520
1 to 5 years	1,820,093,014	4,713,268,662
More than 5 years	834,173	10,107
Undefined	34,088,788,091	36,893,319,101
Effective interest rate at 31/12	**1.35%**	**1.27%**

The outstanding amounts in current accounts remained high in 2024. The fixed-term deposits (term accounts) decreases, 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 24.

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.

18.4. 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**	**7,487,208,960**
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	2,552,416,988	2,091,482,319
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	4,177,688,635	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, EUR 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.

18.5. Subordinated debt securities issued

The Company has no outstanding subordinated debt securities.

18.6. Other financial liabilities

The other financial liabilities consist of lease liabilities measured and recorded in accordance with the IFRS 16 standard. They mainly concern the lease liability to Investar for its own office buildings.

	31/12/2023	31/12/2024
Other financial liabilities	**85,677,345**	**91,903,666**
Breakdown by type		
Leasing	85,677,345	91,903,666
Breakdown by residual term or maturity		
Up to 1 year	13,121,106	14,613,341
1 to 5 years	44,070,231	48,206,167
More than 5 years	28,486,008	29,084,158

19. 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	**5,479,796**	**2,140,510**	**1,338,198**	**235,555**	**9,194,059**
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	1,832,884	0	0	0	1,832,884
Closing balance at 31 December 2023	**7,312,680**	**2,529,756**	**1,036,440**	**239,648**	**11,118,524**
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	1,132,052	0	0	0	1,132,052
Closing balance at 31 December 2024	**8,444,732**	**2,691,258**	**1,404,938**	**244,921**	**12,785,849**

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	**52,910,073**	**61,288,349**
Current service cost	4,752,083	5,744,439
Interest expenses	2,071,600	2,152,585
Actuarial gain or loss resulting from changes in demographic assumptions	-546,385	-82,456
Actuarial gain or loss resulting from changes in financial assumptions	3,128,413	-185,745
Experience adjustments	-56,982	1,968,864
Benefits paid	-970,453	-1,869,149
Defined benefit obligations at the end of the period	**61,288,349**	**69,016,887**
Fair value of plan assets (insurance contracts) at the beginning of the year	**47,430,277**	**53,975,669**
Interest income	1,918,702	1,948,785
Employer contributions	7,776,570	7,995,718
Actuarial gain or loss resulting from changes in financial assumptions	3,261,022	-604,141
Experience adjustments	-5,440,449	-874,727
Benefits paid	-970,453	-1,869,149
Fair value of plan assets (insurance contracts) at the end of the year	**53,975,669**	**60,572,155**
Funded status	**-7,312,680**	**-8,444,732**
Asset ceiling	0	0
Net defined benefit obligations	**-7,312,680**	**-8,444,732**
Net defined benefit obligations at the beginning of the year	**-5,479,796**	**-7,312,680**
(Expenses) and income recognised in the statement of profit or loss	-4,904,981	-5,948,239
Revaluations recognised in equity	-4,704,473	-3,179,531
Employer contributions	7,776,570	7,995,718
Net defined benefit obligations at the end of the year	**-7,312,680**	**-8,444,732**
Amounts recognised in the statement of profit or loss	**-4,904,981**	**-5,948,239**
Current service cost	-4,752,083	-5,744,439
Past-service cost	0	0
Interest expenses	-2,071,600	-2,152,585
Interest income	1,918,702	1,948,785
Administrative expenses and taxes	0	0

Revaluations recognised in equity	**-4,704,473**	**-3,179,531**
Actuarial gain or loss resulting from changes in demographic assumptions	546,385	82,456
Actuarial gain or loss resulting from changes in financial assumptions	132,609	-418,396
Experience adjustments	-5,383,467	-2,843,591
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	947	77
Passive affiliates	1,167	145
Estimated contributions 2024	7,320,568	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 defined benefit obligations

	31/12/2023	31/12/2024
Discount rate	**- 100 bp**	**- 100 bp**
Impact on the defined benefit obligations	+19.62%	+19.62%
Impact on the fair value of plan assets (insurance contracts)	+19.04%	+18.89%
Salary increase rate	**- 100 bp**	**- 100 bp**
Impact on the defined benefit obligations	-1.48%	-1.97%
Impact on the fair value of plan assets (insurance contracts)	+0.00%	+0.00%

Weighted average term

	31/12/2023	31/12/2024
Average duration of the pension obligation	16.3	16.3

20. Other liabilities

The other liabilities break down as follows:

	31/12/2023	31/12/2024
Social security charges	11,867,629	13,190,149
Accounts payable suppliers	52,185,497	44,135,765
Debts – other group companies	14,339,377	11,746,455
Debts – agents	27,150,375	27,247,929
Suspense accounts – lending transactions	24,946,874	20,676,030
Suspense accounts – payment transactions	37,715,866	27,898,291
Suspense accounts – securities transactions	5,851,372	6,309,863
Other taxes	3,151,900	5,526,980
Other	22,815,100	29,948,523
Total	**200,023,990**	**186,679,984**

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.

21. 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 339,043 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	**52,504,201**	**43,018,581**	**96,919,884**
Additions	1,578,498	6,037,831	7,616,330
Interest expense (liability)/income (receivable)		805,887	1,140,978
Lease payments		-9,295,579	-16,658,977
Depreciation	-7,052,655		
Adjustments due to remeasurements	25,109	-124,992	-3,340,869
Adjustments due to modifications	0	0	0
Derecognition	-3,240,613		
Closing balance as per 31/12/2023	**43,814,539**	**40,441,728**	**85,677,345**

	Right-of-use assets	Lease receivables	Lease liabilities
Opening balance as per 01/01/2024	**43,814,539**	**40,441,728**	**85,677,345**
Additions	14,377,354	14,396,277	28,773,630
Interest expense (liability)/income (receivable)		997,481	1,695,603
Lease payments		-10,073,253	-18,212,842
Depreciation	-7,755,784		
Adjustments due to remeasurements	2,136,795	-3,570,709	-6,030,071
Adjustments due to modifications	0	0	0
Derecognition	-4,596,155		
Closing balance as per 31/12/2024	**47,976,748**	**42,191,523**	**91,903,666**

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 conclusion of new leases and renewals of leases (branch network).

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	-1,467,794	5,375,905	-4,088,018	1,287,887
Tangible assets	-1,043,847	6,143,152	-4,427,750	1,715,403
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	39,663,124
Total 31/12/2023	**-7,052,655**	**67,041,795**	**-23,227,256**	**43,814,539**

Right-of-use asset	Depreciation	Acquisition value	Accumulated depreciation	Net carrying amount
Company cars	-2,301,687	10,688,784	-4,468,535	6,220,249
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	**-7,755,784**	**72,441,759**	**-24,465,818**	**47,975,940**

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	14,316,478	17,331,618
1 to 5 years	45,830,046	53,384,519
More than 5 years	29,623,513	32,208,406
Total	**89,770,037**	**102,924,543**

Lease liabilities (discounted)	31/12/2023	31/12/2024
Up to 1 year	13,121,106	14,613,341
1 to 5 years	44,070,232	48,206,167
More than 5 years	28,486,008	29,084,158
Total	**85,677,345**	**91,903,666**

The average discount rate on the lease liabilities is 2.92% (previous year 3.46%).

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.

22. Fair value of financial instruments

22.1. 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).

22.2. 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;
- The other credit receivables and financial instruments relate to bonds in which the 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	2,152,396,828	2,152,396,828	2,389,807,691	2,389,807,691
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	39,099,706,812	35,898,361,333	41,152,569,722	38,891,968,071
Term loans	1,242,177,824	1,196,246,650	1,184,146,023	1,143,571,961
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	7,090,119,165	6,867,504,711	7,313,499,803	7,236,948,951
Total financial assets	**50,246,797,566**	**46,771,432,843**	**52,740,599,136**	**50,360,733,611**
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	6,190,831,697	6,190,831,697	6,500,851,431	6,500,851,431
Fixed-term deposits	8,417,221,745	8,458,487,079	6,893,070,289	6,969,103,012
Regulated savings deposits	24,767,331,301	24,767,331,301	27,275,465,778	27,275,465,778
Mortgage-linked deposits	621,230,799	663,989,874	685,366,597	736,625,834
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	6,752,523,947	6,408,499,545	7,487,208,960	7,205,444,358
Other financial liabilities	85,677,345	85,677,345	91,903,666	91,903,666
Total financial liabilities	**50,583,709,939**	**50,323,709,945**	**52,284,273,927**	**52,129,801,285**

The table below shows the fair values of the listed IFRS classifications presented schematically by hierarchy level.

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	2,152,396,828	0	2,152,396,828	0
Financial assets at amortised cost	44,556,435,683	5,535,760,981	1,497,513,676	37,523,161,025
Loans and advances	37,688,930,972	0	171,980,950	37,516,950,022
Debt securities	6,867,504,711	5,535,760,981	1,325,532,727	6,211,003
Financial liabilities at amortised cost	50,323,709,945	4,702,531,051	34,792,733,447	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	2,389,807,691	0	2,389,807,691	0
Financial assets at amortised cost	47,904,681,040	6,077,032,173	1,336,898,404	40,490,750,462
Loans and advances	40,667,732,089	0	183,178,598	40,484,553,491
Debt securities	7,236,948,951	6,077,032,173	1,153,719,806	6,196,971
Financial liabilities at amortised cost	52,129,801,285	5,840,107,809	38,583,964,629	7,705,728,846

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.

22.3 Financial instruments measured at fair value

The following tables present the fair values of the financial instruments that are 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	**4,371,323,668**	**2,441,849,963**	**1,925,776,256**	**3,697,450**
Financial assets held for trading	63,051,701	0	63,051,701	0
Financial assets at fair value through other comprehensive income	2,849,599,422	2,434,746,590	411,155,382	3,697,450
Non-trading financial assets mandatorily at fair value through profit or loss	33,615,223	7,103,373	26,511,850	0
Derivatives used for hedging	1,425,057,322	0	1,425,057,322	0
Liabilities measured at fair value	**295,205,715**	**0**	**295,205,715**	**0**
Financial liabilities held for trading	52,642,345	0	52,642,345	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	**3,576,791,103**	**1,806,063,874**	**1,767,050,780**	**3,676,449**
Financial assets held for trading	28,431,717	0	28,431,717	0
Financial assets at fair value through other comprehensive income	2,337,317,646	1,796,530,416	537,110,781	3,676,449
Non-trading financial assets mandatorily at fair value through profit or loss	35,334,486	9,533,458	25,801,027	0
Derivatives used for hedging	1,175,707,254	0	1,175,707,254	0
Liabilities measured at fair value	**339,283,672**	**0**	**339,283,672**	**0**
Financial liabilities held for trading	22,912,955	0	22,912,955	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 were no level changes 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	**2,944,450**	**0**
Purchases and new contracts	0	0
Expired instruments	0	0
(Partial) repayments	0	0
Changes to other levels	0	0
Changes from other levels	0	0
Other changes (including value changes)	753,000	0
Closing at 31/12/2023	**3,697,450**	**0**
Purchases and new contracts	0	0
Expired instruments	0	0
(Partial) repayments	0	0
Changes to other levels	0	0
Changes from other levels	0	0
Other changes (including value changes)	-21,001	0
Closing at 31/12/2024	**3,676,449**	**0**

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 3,676,449 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 other comprehensive income appear in in equity.

The EUR 3,676,449 equity instruments with a level 3 fair value consist of shares of an infrastructure 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.

23. Derivatives

Besides derivatives embedded in contracts, the Company has three types of derivatives (derived financial instruments) on its balance sheet on 31 December 2024: 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.

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

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

24. 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	**1,322,582,331**	**1,570,210,325**
Financial assets at fair value with recognition of fair value changes through profit or loss	1,057,674	1,364,826
Financial assets measured at fair value with fair value changes recognised in OCI	56,228,036	62,134,844
Financial assets at amortised cost – loans and advances	887,973,187	1,002,968,444
Financial assets at amortised cost – debt securities	129,561,368	171,224,786
Derivatives used for hedging	245,160,882	329,886,375
Other assets	1,918,702	1,948,785
Interest income on liabilities	682,482	682,265
Interest expenses	**581,645,301**	**882,693,650**
Deposits from central banks and credit institutions	55,464,172	42,574,735
Deposits from other than central banks and credit institutions	313,060,777	587,028,822
Senior debt securities issued	144,345,034	167,180,216
Subordinated debt securities issued	0	0
Lease liabilities	1,140,979	1,695,620
Derivatives used for hedging	65,485,254	82,061,672
Other liabilities	2,071,600	2,152,585
Interest expenses on assets	77,486	0
Net interest income	**740,937,030**	**687,516,675**
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.

25. Dividend income

Dividends received are specified below.

	31/12/2023	31/12/2024
Dividend income	**438,841**	**408,477**
Equity instruments at fair value through other comprehensive income	438,841	408,477
Equity instruments mandatorily measured at fair value through profit or loss	0	0

26. Net fee and commission income

Net fee and commission income increased from EUR 50.1 million to EUR 75.1 million for the 2024 financial year.

	31/12/2023	31/12/2024
Fee and commission income	**248,697,432**	**298,633,639**
Securities: buy and sell orders and other	11,749,369	21,140,842
Asset management, including central administrative services for collective investment	181,234,210	210,831,058
Customer funds distributed but not managed	17,071,953	17,355,931
Payment services	29,264,047	40,806,343
Other	9,377,854	8,499,465
Fee and commission expenses	**-198,609,291**	**-223,574,268**
Acquisition costs	-152,444,503	-172,117,768
Asset management	-8,725,225	-9,645,426
Custody	-2,070,051	-2,306,005
Payment services	-30,615,671	-34,500,183
Other	-4,753,842	-5,004,885
Net fee and commission income	**50,088,141**	**75,059,372**

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.

27. 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	101,587	2,886,504
Financial assets at amortised cost	0	2,291,699
Losses on derecognition		
Debt securities at fair value through other comprehensive income	-31,228	-3,008
Financial assets at amortised cost	-934,278	-10,695
Total result on derecognition	**-863,920**	**5,164,500**
of which debt securities at fair value through other comprehensive income	70,358	2,883,496
of which financial assets at amortised cost	-934,278	2,281,003

The fair values of the category “Financial assets at amortised cost” are given in Note 22. 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 result on derecognition was EUR 2,790,462 for debt securities at fair value through other comprehensive income, EUR 2,291,699 for financial assets at amortised cost and EUR 96,043 for financial assets at fair value through other comprehensive income.

The sales under the financial assets at amortised cost heading (hold-to-collect business model) are 4 positions with a carrying amount of EUR 55,383,621 that were near maturity at the time of sale.

28. Gains or losses on financial assets and liabilities held for trading

The results of the financial 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 in profit and loss.

29. 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 concerns the impact on market value of a limited portfolio of securities that did not meet the SPPI tests and were therefore recognised at market value on the balance sheet with an impact on profit and loss.

	31/12/2023	31/12/2024
Fair value changes related to debt securities	845,992	1,968,071

30. 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).

31. Gains or losses on the derecognition of non-financial assets

The gains and losses on derecognition of non-financial assets are shown below.

	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**

32. Net other operating income

Net other operating income consists of the following elements:

	31/12/2023	31/12/2024
Other operating income		
Cost-sharing, group companies	43,352,604	71,334,343
Agent recuperations	9,944,228	8,623,288
Other	11,011,646	7,983,744
Other operating expenses		
Cost-sharing, group companies	-14,147,705	-15,321,545
Other	-1,190,903	-1,182,498
Total	**48,969,870**	**71,437,332**

The “Cost-sharing, group companies” item refers to expenses recharged to and from Argenta Group entities not consolidated by the Company (in this case the umbrella holding company BVg and Aras).

This concerns the recharge to these two Group entities on the one hand (for EUR 71.3 million) and the recharge from these two Group entities to the Company on the other hand (EUR 15.3 million). As a result of introducing a refined cost allocation, more costs are allocated to the insurer Argenta Assuranties, increasing this net income from cost allocation by EUR 26.8 million.

“Other” under other operating income includes recoveries of administrative costs (file costs) from customers, and of rental costs and IT infrastructure costs from agents.

33. Administrative expenses

Staff expenses consist of the following components:

	31/12/2023	31/12/2024
Wages and salaries	78,960,406	86,968,367
Social security charges	18,350,647	20,527,058
Pension expenses	5,521,664	7,589,343
Share-based payments	0	0
Other	4,842,592	4,064,121
Total staff expenses	**107,675,308**	**119,148,888**
Average number of employees in FTE	**911.3**	**969.6**

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	6,234,446	5,427,709
Professional fees – ICT	65,542,524	50,261,301
Professional fees (including legal and fiscal)	27,485,790	20,135,841
IT expenses	70,403,197	64,444,708
Rental expenses	4,188,286	3,194,403
Other taxes and bank levies	100,486,220	96,502,162
Servicing charges (mortgage loans, ATMs)	22,015,084	23,153,930
Utilities	8,615,998	8,195,249
Supervisor	9,605,901	12,314,271
Postage	3,496,698	5,040,794
Interim labour	1,442,531	1,265,173
Other	24,501,725	25,547,482
Total administrative expenses	**344,018,400**	**315,483,023**

The decrease in administrative expenses is the result of focusing on insourcing/filling vacancies, decreasing professional fees (EUR -22.6 million). There is also a general focus on cost control and efficiency, resulting in decreased IT costs (EUR -6.0 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 100.5 million to EUR 96.5 million.

The “Other” heading includes expenses for telephony, postage, office supplies, professional contributions and travel expenses. These are cost items that are strictly monitored.

34. 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	33,408	1,284,595
Debt securities at amortised cost	-10,041,068	-3,200,864
Loans and advances at amortised cost	-2,762,719	3,724,166
Property, plant and equipment	0	0
Goodwill	0	0
Impairments	**-12,770,379**	**1,807,896**

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, 19 and 34.

In 2023 there is a (net) negative impact of EUR 10,007,660 on debt securities and EUR 2,762,719 on loans and advances.

For the financial year 2024, there is a (net) negative impact of EUR 1,916,269 on debt securities and a positive impact of EUR 3,724,166 on loans and advances.

	01/01/2023	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	**-1,969,075**	**33,408**	**-1,935,667**	**0**	**0**	**33,408**
Stage 1	-1,969,075	33,408	-1,935,667			33,408
Stage 2	0	0	0			0
Stage 3	0	0	0	0	0	0
Debt securities at amortised cost	**-6,124,096**	**-10,041,068**	**-16,165,164**	**0**	**0**	**-10,041,068**
Stage 1	-4,502,977	-1,127,135	-5,630,112			-1,127,135
Stage 2	-1,621,119	-8,913,933	-10,535,052			-8,913,933
Stage 3	0	0	0	0	0	0
Loans and advances at amortised cost	**-45,010,602**	**306,033**	**-44,704,568**	**1,378,411**	**-4,447,163**	**-2,762,719**
Stage 1	-5,220,556	-840,147	-6,060,703			-840,147
Stage 2	-14,658,402	2,495,370	-12,163,032			2,495,370
Stage 3	-25,131,644	-1,349,189	-26,480,833	1,378,411	-4,447,163	-4,417,941
of which consumer loans	*-4,915,222*	*-286,760*	*-5,201,982*	*236,028*	*-1,809,259*	*-1,859,992*
of which mortgage loans	*-18,477,392*	*-1,898,830*	*-20,376,222*	*705,298*	*-1,098,776*	*-2,292,308*
of which term loans	*-462,736*	*57,511*	*-405,226*	*0*	*0*	*57,511*
of which advances and overdrafts	*-1,276,295*	*778,891*	*-497,404*	*437,085*	*-1,539,127*	*-323,152*
Total	**-53,103,772**	**-9,701,627**	**-62,805,399**	**1,378,411**	**-4,447,163**	**-12,770,379**

	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	**-1,935,667**	**1,284,595**	**-651,072**	**0**	**0**	**1,284,595**
Stage 1	-1,935,667	1,284,595	-651,072			1,284,595
Stage 2	0	0	0			0
Stage 3	0	0	0	0	0	0
Debt securities at amortised cost	**-16,165,164**	**-3,200,864**	**-19,366,029**	**0**	**0**	**-3,200,864**
Stage 1	-5,630,112	2,895,398	-2,734,714			2,895,398
Stage 2	-10,535,052	-6,096,262	-16,631,314			-6,096,262
Stage 3	0	0	0	0	0	0
Loans and advances at amortised cost	**-44,704,568**	**5,680,429**	**-39,024,139**	**1,715,833**	**-3,672,097**	**3,724,166**
Stage 1	-6,060,703	3,387,312	-2,673,391			3,387,312
Stage 2	-12,163,032	-580,154	-12,743,186			-580,154
Stage 3	-26,480,833	2,873,272	-23,607,561	1,715,833	-3,672,097	917,008
of which consumer loans	*-5,201,982*	*-593,307*	*-5,795,289*	*382,816*	*-1,076,695*	*-1,287,186*
of which mortgage loans	*-20,376,222*	*3,696,342*	*-16,679,880*	*860,019*	*-1,678,115*	*2,878,246*
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	**-62,805,399**	**3,764,160**	**-59,041,239**	**1,715,833**	**-3,672,097**	**1,807,896**

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

	31/12/2023						31/12/2024					
External shock	**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 20.7 million, compared to EUR 19.7 million at the beginning of the year, which resulted in a total impact of EUR -1.0 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 -7.4 million and EUR +5.2 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 19). In addition, EUR 3.7 million of loans were permanently written down and EUR 1.7 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.

35. 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	79,764,943	101,939,281
Current tax expenses for prior periods	-251,350	-5,499,686
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	-1,439,233	-481,121
Impact of total tax on profits or loss	**97,379,475**	**107,493,280**
Reconciliation of statutory and effective tax rate		
Profit or loss before tax	339,981,889	380,589,385
Statutory tax rate	25.00%	25.00%
Income tax calculated using statutory rate	84,995,472	95,147,346
Tax effect of different tax rates in other jurisdictions	868,761	641,735
(Reversal) Impairment on deferred taxes	0	0
Tax effect of non-taxable income	0	0
Tax effect of non-tax-deductible expenses	12,168,032	17,381,575
Prior period taxation	-435,864	-5,543,862
Other differences in statutory taxation	-216,926	-133,514
Total income tax expense	**97,379,475**	**107,493,280**
Effective tax rate	28.64%	28.24%

As reflected in the table above, the effective tax rate was 28.24% in 2024 and 28.64% in 2023compared 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

36. 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 figures. 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					347187500	
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						
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**	

	31/12/2023		31/12/2024		Average 2024	
	Nominal value	Fair value	Nominal value	Fair value	Nominal value	Fair value
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 at the NBB, for which securities will be encumbered as and when this credit line is used.

37. Off-balance sheet liabilities

The Bank Pool itself has given and received collateral and guarantees. The reasons and nominal values of the assets involved can be found in the table below.

	31/12/2023	31/12/2024
Collateral received	50,157,586,728	53,365,645,954

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	1,501,451,520	2,753,107,729
Credit lines received	263,300,000	276,775,000

The Bank Pool has a EUR 277 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, 19 and 34.

Argenta 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

38. Contingent liabilities

The Company is a defendant in a number of disputes within the context of normal business operations.

The Company creates 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 19 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 no 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.

Appendix: overview of abbreviations used

(F)IRB	Foundation of the Internal Ratings-Based approach
ALCO	Assets and Liability Committee
CD	Certificates of Deposits
CEO	Chief Executive Officer
CET1	Common Equity Tier 1
CRD	Capital Requirements Directive
CRR	Capital Requirements Regulations
CVA	Credit Value Adjustment
DNB	The Dutch central bank
DRD	Dividends Received Deduction
DSTI	Debt Service To Income
DVA	Debit Valuation Adjustment
ECB	European Central Bank
ECL	Expected Credit Losses
ELBE	Expected Loss Best Estimate
EMTN	European Medium Term Note
EONIA	Euro OverNight Index Average
EPC	Energy Performance Certificate
ESTR	Euro Short Term Rate
FIBR/AIRB	Foundation Internal Ratings Based/Advanced Internal Rating Based
FVOCI	Fair Value through Other Comprehensive Income
HQLA	High Quality Liquid Assets
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Internal Liquidity Adequacy Assessment Process
IFRS	International Financial Reporting Standards
IO	Investment Consultation
IRS	Interest Rate Swap
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
LRE	Leverage Ratio Exposure
LTI	Loan To Income
MBS	Mortgage Backed Security
MFVTPL	Mandatorily Fair Value through Profit and loss
MREL	Minimum Required Owned Funds and Eligible Liabilities
NBB	National Bank of Belgium
NFR	Non-Financial Risk
NHG	Dutch Mortgage Guarantee
NPV	Net Present Value
NSFR	Net Stable Funding Ratio

OCI	Other Comprehensive Income
PD	Probability of Default
RAF	Risk Appetite Framework
RMBS	Residential Mortgage Backed Security
RWA	Risk Weighted Assets
SPPI	Solely Payments of Principal and Interest
SPV	Special Purpose Vehicle
SREP	Supervisory Review & Evaluation Process
TREA	Total Risk Exposure Amount

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 SPAARBANK NV FOR THE ACCOUNTING YEAR ENDED ON 31 DECEMBER 2024

We present to you our registered auditor's report in the context of our legal limited assurance engagement on the consolidated sustainability statement of Argenta Spaarbank 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 Spaarbank 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 Spaarbank 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 55.832.552.654 and the consolidated statement of profit or loss shows a profit for the year of EUR 273.096.104.

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.

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BTW - TVA BE 0419.122.548
RPR Brussel - RPM Bruxelles
IBAN : BE 95 0018 4771 0358
BIC : GEBABEBB

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.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

<u>Impairments on loans and advances</u>

We refer to heading "Financial assets measured at amortised cost" of the consolidated balance sheet statement in the consolidated financial statements and to notes n° 11 "Financial assets at amortised cost" and n° 34 "Impairments" in which the impairment losses are disclosed.

Description

As at 31 December 2024, the Group has EUR 42.971.046.762 loans and advances measured at amortised cost representing 77% of total assets.

The measurement of the expected credit losses and the determination of the stage allocation contain subjective elements and require significant judgement from management, such as the selection of macro-economic scenarios used in the determination of expected credit losses, the evaluation of deteriorating credit quality and the application of models for the determination of expected credit losses.

Given the significance of impairments on loans and advances, and the related high degree of estimation uncertainty, we consider the determination and measurement of impairments on loans and advances as a key audit matter.

Our audit procedures

With the assistance of our valuation specialists, we performed the following procedures:

- Evaluation of the design and implementation of key controls around the expected credit loss.

- Inspection of the minutes of the relevant committees and rationale for conclusions made therein, as input to our risk assessment and to support our selection and extent of audit procedures.
- Evaluation if key models are delivering a reliable output on the basis of the assessment of the model validation process, including the assessment of the Macro-Economic Factors ("MEF") and the weights associated to the different economic scenarios included in the models.
- Evaluation of the reliability of key inputs to the models such as loans and advances data as well as collateral used to determine the collective impairment. For a sample of loans and advances, comparison of data used in the models with underlying documentation such as contracts and other relevant documents.
- Evaluation whether the manual adjustments to the model-based expected credit loss are adequately justified and supported.
- Inspection of a sample of credit files in stage 1, 2 and 3 to assess whether the stage classification used in the expected credit loss models are accurate.
- Evaluation whether the assumptions used in the expected credit loss models, such as reasonableness of scenarios, scenario weighting, expected cash flows, collateral values, effective interest rates, etc, are reasonable.
- Assessment of the adequacy of the relevant disclosures in the consolidated financial statements.

Fair value measurement of Level 2 and Level 3 financial instruments

We refer to headings "Financial assets held for trading", "Non-trading financial assets mandatorily at fair value through profit or loss", "Financial assets at fair value through other comprehensive income", "Derivatives used for hedge accounting", and "Financial liabilities held for trading" of the consolidated balance sheet statement in the consolidated financial statements and to note n° 22 "Financial instruments measured at fair value" in which the fair value analysis of the financial instruments recognized on the balance sheet is disclosed.

Description

As at 31 December 2024, the Group has:

- Financial assets held for trading for EUR 28.431.717 Level 2;
- Financial assets at fair value through other comprehensive income for EUR 537.110.781 Level 2 and EUR 3.676.449 Level 3;
- Non-trading financial assets mandatorily at fair value through profit or loss for EUR 25.801.027 Level 2;
- Derivatives used for hedge accounting for EUR 1.175.707.254 Level 2 recognized on the asset side and EUR 316.370.716 Level 2 recognized on the liability side;
- Financial liabilities held for trading for EUR 22.912.955 Level 2.

The determination of the fair value of Level 2 and 3 financial instruments is based on a range of inputs. Where observable market data is not readily available, estimates are developed and are subject to a higher level of judgment.

The determination of the fair value of Level 2 and 3 financial instruments, including complex financial instruments, represent a higher exposure to risk of incorrect valuation due to the absence of observable market data, the complexity of certain valuation models and the higher level of judgment involved.

Our audit procedures

With the assistance of our valuation specialists we performed the following procedures:

- Obtaining an understanding of the processes regarding the valuation of financial instruments.
- Evaluation of the design and implementation of key controls around the valuation of financial instruments.
- Inspection of the minutes of the Asset and Liability Committee and rationale for conclusions made therein as input to our risk assessment and to support our selection and extent of audit procedures.
- Independent determination of the fair value for the Level 2 and 3 financial instruments on a sample basis.
- Assessment of the adequacy of the relevant disclosures in the consolidated financial statements.

<u>IT systems and controls over financial reporting</u>

Description

We identified IT systems and controls over financial reporting as a key audit matter for the Group because its financial accounting and reporting systems are fundamentally reliant on IT systems and automated application controls to process significant transaction volumes. Automated application controls and general IT controls, which include IT governance, general IT controls over program development and changes, access to programs and data and computer operations, are required to be adequately designed and to operate effectively to ensure accurate financial reporting.

Our audit procedures

With the assistance of our IT specialists, we have performed the following procedures:

- Examination of the Group's framework of governance over the IT organisation.
- Assessment of the design, implementation and evaluation of the operating effectiveness of general IT controls over program development and changes, access to programs and data and computer operations on key IT systems that support financial accounting and reporting also taking into consideration compensating controls and assessment of the impact on the extent and

nature of other audit procedures whenever controls are not operating effectively.

- Assessment of the design and implementation and evaluation of the operating effectiveness of IT application controls in the key processes impacting financial reporting of the Group, including compensating controls and substantive procedures whenever supporting general IT controls are not operating effectively (e.g. access to programs and data).
- Assessment of the integrity of data transmission through the different IT systems to the financial reporting systems.
- Assessment of the design and evaluation of operating effectiveness of controls at the relevant service organization.

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 audit committee regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the audit committee with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

For the matters communicated with the audit committee, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter.

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.

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

The annual report on the consolidated financial statements contains the consolidated sustainability information 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.

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.

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.

Other aspect

- This report is consistent with our additional report to the audit committee on the basis of Article 11 of Regulation (EU) No 537/2014.

Zaventem, 9 April 2025

KPMG Bedrijfsrevisoren - Réviseurs d'Entreprises
Statutory Auditor
represented by

Kenneth Vermeire
Bedrijfsrevisor / Réviseur d'Entreprises