Intesa Sanpaolo S.p.A

CDP Corporate Questionnaire 2026

C1. Introduction

(1.1) In which language are you submitting your response?

☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

☑ EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

☑ Bank

(1.3.2) Organization type

☑ Publicly traded organization

(1.3.3) Description of organization

The Intesa Sanpaolo Group (ISP), with a capitalisation of €105.9bn as at 30/06/2026, is one of the top banking groups in Europe with a firm ESG commitment including a strong focus on climate. ISP is the largest banking group in Italy, with ~14 million customers and ~2,600 branches; it also has a strategic international presence, with over 900 branches and ~7.4 million customers, including a number of commercial banking subsidiaries mainly located in Central Eastern Europe, Middle Eastern and North African areas. The Group has a diversified business model, with revenues from financing, investment, asset management and insurance underwriting activities. This diversification increases the breadth of analysis and actions to be taken with respect to climate and nature-related risks, but on the other hand offers a wider range of climate-related opportunities. To correctly address risks and opportunities, ISP considers robust sustainability governance, solid risk management, the development of a cutting-edge range of products — including loans, services, advisory, a wide range of sustainable and responsible investments — as well as the implementation and updating of processes, rules and procedures to support the transition towards a sustainable, green and circular economy, as an integral part of its strategy to combat climate change. ISP has committed to contributing to the achievement of global climate goals, facilitating the transition to a low

carbon economy. This commitment was confirmed in 2021, when the Group adhered to the main Net-Zero initiatives promoted by UNEP FI. Among others, it also joined PRB, PSI and PRI. ISP has chosen to pursue the "Net Zero" objective by 2050 for all its main business lines, including its own emissions, the lending and investment portfolios, the asset management and insurance divisions. In 2021, in addition to joining the NZBA, ISP, through its subsidiaries, joined the NZAMI and the NZAOA as well as the Forum for Insurance Transition to Net Zero – FIT (previously NZIA). In 2022, regarding the commitments undertaken by acceding to NZAMI and NZAOA, the Group's wealth management companies published their first Net-Zero aligned objectives. Regarding financed emissions from lending activities, sectors covered by target setting accounted at end of 2025 for ~73% of the financed emissions of the highest emitting sectors identified by UNEP FI's "Guidelines for Climate Target Setting for Banks". Targets are supported by actions identified and summarised in a Sectoral Transition Plan, published in the 2025 Climate Report. From the end of 2024 to the end of 2025 a further reduction of 12% in absolute financed emissions was registered. The Group has also established several policies, including those that address sector-specific issues through exclusion and limitation criteria regarding lending activities for the Coal Mining and Oil & Gas sectors, as well as phase out commitments to exposures towards Coal Mining and unconventional Oil & Gas resources, accomplished in 2025. In addition, within its Own Emissions Plan, the Group expects to reach carbon neutrality for own emissions and 100% of electricity purchased from renewable sources by 2030. On 27 January 2025, the Group received the validation by SBTi of targets for the reduction of own emissions and the Group's financed emissions (related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets). The Group's commitment to decarbonisation continues under the new 2026–2029 Business Plan, with the confirmation of the 2030 targets for its own emissions and financed emissions. The 2022-2025 Business Plan confirmed the strong focus on climate with the commitment to providing €88bn of which €76bn of new lending to support the green and circular economy and the green transition (including Mission 2 NRRP) and €12bn dedicated to individuals, mostly in relation to green lending to individuals. The commitment to the circular economy was confirmed with a dedicated credit facility amounting to €8bn over the Business Plan horizon. In the period 2021-2025, new lending in support of the green economy, circular economy and ecological transition amounted to ~€89.4bn, exceeding the target set of €76bn. This commitment has been renewed in the 2026-2029 Business Plan, with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities. ISP's commitment to sustainable strategy is recognised also by market participants and reflected in its positioning among ESG leading companies in the main ESG indices and rankings. In 2025 the main climate-related assessments were CDP and S&P Global CSA under the environmental dimension, in addition to the other major assessments (e.g. Sustainalytics, MSCI, FTSE, ISS, etc.)

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/31/2025		

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
		☑ Yes	☑ No

(1.4.1) What is your organization's annual revenue for the reporting period?

27270000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	☑ Yes

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

☑ Yes

(1.6.2) Provide your unique identifier

IT0000072618

CUSIP number

(1.6.1) Does your organization use this unique identifier?

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

☑ No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

☑ Yes

(1.6.2) Provide your unique identifier

2W8N8UU78PMDQKZENC08

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

☑ No

(1.7) Select the countries/areas in which you operate.

☑ China
☑ Egypt
☑ Italy
☑ Spain
☑ Brazil
☑ France

☑ Japan
☑ Qatar
☑ Albania
☑ Croatia
☑ Germany
☑ Hungary
☑ Ireland
☑ Australia
☑ Singapore
☑ Luxembourg
☑ Netherlands
☑ Switzerland
☑ United States of America
☑ Poland
☑ Serbia
☑ Romania
☑ Türkiye
☑ Ukraine
☑ Slovakia
☑ Slovenia
☑ United Kingdom
☑ Russian Federation
☑ Republic of Moldova
☑ United Arab Emirates
☑ Bosnia and Herzegovina

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

959887000000

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

☑ Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

☑ Yes, the value of the portfolio based on total assets

(1.10.4) Portfolio value based on total assets

430658000000

(1.10.6) Type of clients

☑ Banks
☑ Pension funds
☑ Asset managers
☑ Retail clients
☑ Corporates (SMEs)
☑ Insurance Companies
☑ Endowments & Foundations
☑ Corporates (Large companies)
☑ Family offices / high-net-worth individuals
☑ Government / sovereign / quasi-government / sovereign wealth funds

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

Investing (Asset manager)

(1.10.1) Activity undertaken

☑ Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

☑ Yes, the value of the portfolio based on total assets

(1.10.4) Portfolio value based on total assets

562000000000

(1.10.6) Type of clients

☑ Banks
☑ Pension funds
☑ Asset managers
☑ Retail clients
☑ Corporates (SMEs)
☑ Insurance Companies
☑ Endowments & Foundations
☑ Corporates (Large companies)
☑ Family offices / high-net-worth individuals

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

Investing (Asset owner)

(1.10.1) Activity undertaken

☑ Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

☑ Yes, the value of the portfolio based on total assets

(1.10.4) Portfolio value based on total assets

181108000000

(1.10.6) Type of clients

☑ Banks
☑ Corporates (Large companies)
☑ Corporates (SMEs)
☑ Retail clients

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

☑ Food, beverage & agriculture
☑ Biotech, health care & pharma

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

☑ Yes

(1.10.2) Insurance types underwritten

☑ General (non-life)
☑ Life and/or Health

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

☑ Yes, the value of the portfolio based on total assets

(1.10.4) Portfolio value based on total assets

1753000000

(1.10.6) Type of clients

☑ Corporates (Large companies)
☑ Corporates (SMEs)
☑ Family offices / high-net-worth individuals
☑ Retail clients

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

☑ Upstream value chain
☑ Portfolio

(1.24.3) Highest supplier tier mapped

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

☑ Tier 2 suppliers

(1.24.5) Portfolios covered in mapping

☑ Banking (Bank)

(1.24.7) Description of mapping process and coverage

SUPPLIERS: The purchasing process is centrally overseen by the parent company to ensure compliance with policies and internal regulations. Suppliers must register on the Supplier Gate (SG) portal, allowing mapping and selection through a screening process that assesses financial, technical-organisational and ESG aspects, including analyses of the suppliers' business ethics, respect for human/labour rights, environment/climate change and environmental certifications mapping. If the result of this assessment is positive, suppliers are registered in the Group Suppliers' Register and can be invited to procurement events. Periodic updates of documents (annual report, questionnaire, certifications) can be requested. If a supply or service agreement is signed, suppliers commit to respect the Code of Ethics when performing assigned tasks, extending this to their representatives, employees, associates and subcontractors ("tier 2 suppliers" which must be named in contracts and authorised by the Bank). The qualification process assigns a supplier rating which is monitored over time. The ESG questionnaire is mandatory for new suppliers, and data request campaigns are run annually to cover previously registered ones. At end of 2025,~10,000 suppliers had completed the registration procedure on the SG portal and a subset of ~5,200 were qualified and monitored by Group Procurement. By the end of 2025, 100% of qualified suppliers engaged within the centralised purchasing model had completed the questionnaire and obtained an ESG evaluation, thereby achieving the target (vs 86% in 2024). The value chain includes key upstream categories under centralised sourcing: IT, real estate, advertising and PR, physical safety, office equipment, insurance. PORTFOLIO:For SMEs and Corporates, ISP within its IT system, has classified customers according to NACE codes. Sectors are color-coded mainly based on their environmental risk, each with a related lending strategy (from engagement to disengagement). An ESG Score is assigned per counterparty using more than 20 descriptors (e.g.Carbon Footprint, Climate-Transition Risk Readiness, Climate-Physical Risk Readiness, Water, Natural Resources and Biodiversity, Waste&Pollution, Circular Economy, Green Products and Solutions) and up to 100 parameters for larger companies. At the end of 2025, the calculation of the ESG Score, integrated in the Bank's IT systems with a fully digitalised process, covers a perimeter of over 240,000 counterparties.

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Short-term (by 2028) includes the immediate 3 years following the date of the Business Environment Scan (BES) analysis and aligns with the Group's internal adequacy processes, such as the ICAAP and the ILAAP. ISP's environmental and climate strategy is based on awareness of climate change risks (transition and physical) and opportunities. The range of risks and opportunities related to climate change is identified and analysed with the aim of incorporating them into the ordinary processes of risk assessment, monitoring and credit strategies; this is also reflected in the commercial offering. Potential impacts, related time horizon (short, medium, long term), implemented actions and identified opportunities for each observed potential risk, are updated annually, with reference to both indirect and direct risks. ISP assesses ESG risks through the BES which requires banks to consider the short, medium and long term to evaluate potential impacts of physical and transition risks and opportunities across business areas. This approach demonstrates ISP's commitment to transparency/accountability in analysing and representing ESG risk effects. Moreover, ISP integrated within the risk management framework nature-related risks based on TNFD guidelines and LEAP process. Moreover, the analysis described above contributes to determining the materiality of the environmental issues.

Medium-term

(2.1.1) From (years)

4

(2.1.3) To (years)

6

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Medium-term (by 2031): time interval extending from year 4 to year 6 from the time of the Business Environment Scan (BES) analysis. It considers evolving factors that complement the Business Plan and establishes guidelines for the development of the next plan. ISP's environmental and climate strategy is based on awareness of climate change risks (transition and physical) and opportunities. The range of risks and opportunities related to climate change is identified and analysed with the aim of incorporating them into the ordinary processes of risk assessment, monitoring and credit strategies; this is also reflected in the commercial offering. Potential impacts, related time horizon (short, medium, long term), implemented actions and identified opportunities for each observed potential risk, are updated annually, with reference to both indirect and direct risks. ISP assesses ESG risks through the BES which requires banks to consider the short, medium and long term to evaluate potential impacts of physical and transition risks and opportunities across business areas. This approach demonstrates ISP's commitment to transparency/accountability in analysing and representing ESG risk effects. Moreover, ISP integrated within the risk management framework nature-related risks based on TNFD guidelines and LEAP process. Moreover, the analysis described above contributes to determining the materiality of the environmental issues.

Long-term

(2.1.1) From (years)

7

(2.1.2) Is your long-term time horizon open ended?

☑ No

(2.1.3) To (years)

25

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Long-term: time interval extending until 2050. This interval is particularly important considering the Group's commitment to achieving Net Zero emissions targets by 2050. ISP's environmental and climate strategy is based on awareness of climate change risks (transition and physical) and opportunities. The range of risks and opportunities related to climate change is identified and analysed with the aim of incorporating them into the ordinary processes of risk assessment, monitoring and

credit strategies; this is also reflected in the commercial offering. Potential impacts, related time horizon (short, medium, long term), implemented actions and identified opportunities for each observed potential risk, are updated annually, with reference to both indirect and direct risks. ISP assesses ESG risks through the Business Environment Scan (BES) which requires banks to consider the short, medium and long term to evaluate potential impacts of physical and transition risks and opportunities across business areas. This approach demonstrates ISP's commitment to transparency/accountability in analysing and representing ESG risk effects. Moreover, ISP integrated within the risk management framework nature-related risks based on TNFD guidelines and LEAP process. Moreover, the analysis described above contributes to determining the materiality of the environmental issues.

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	☑ Yes	☑ Both dependencies and impacts

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	☑ Yes	☑ Both risks and opportunities	☑ Yes

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

(2.2.2.1) Environmental issue

☑ Climate change
☑ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

☑ Dependencies
☑ Impacts
☑ Risks
☑ Opportunities

(2.2.2.3) Value chain stages covered

☑ Direct operations
☑ Upstream value chain

(2.2.2.4) Coverage

☑ Full

(2.2.2.5) Supplier tiers covered

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

☑ Annually

(2.2.2.9) Time horizons covered

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.2.10) Integration of risk management process

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

☑ Site-specific
☑ Local
☑ Sub-national
☑ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Risk models

International methodologies and standards

☑ ISO 14001 Environmental Management Systems

☑ Other international methodologies and standards, please specify :ISO 50001, Equator Principles

Databases

☑ Nation-specific databases, tools, or standards, please specify :SwissRE, Copernicus, INGV, ISPRA and Civil Protection

☑ Regional government databases, please specify :Arpa's weather alert bulletins and those of the Department of Civil Protection on critical national and regional issues

☑ Other databases, please specify :World Database on Protected Areas (WDPA)

Other

☑ External consultants

☑ Internal company methods

☑ Materiality assessment

☑ Partner and stakeholder consultation/analysis

☑ Scenario analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Drought

☑ Tornado

☑ Avalanche

☑ Heat wave

☑ Landslide

☑ Storm (including blizzards, dust, and sandstorms)

☑ Wildfires

☑ Cold wave/frost

☑ Cyclone, hurricane, typhoon

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Flood (coastal, fluvial, pluvial, ground water)

Chronic physical

☑ Heat stress
☑ Water stress
☑ Sea level rise
☑ Coastal erosion
☑ Changing wind patterns
☑ Temperature variability
☑ Increased severity of extreme weather events
☑ Changing temperature (air, freshwater, marine water)
☑ Operations in or adjacent to areas important for biodiversity
☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

☑ Carbon pricing mechanisms
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation
☑ Other policy risk, please specify :Changes in environmental regulations and standards that the Group voluntarily adheres to (ISO standards)

Market

☑ Lack of availability and/or increased cost of raw materials
☑ Other market risk, please specify :Cost related to potential taxes connected with greenhouse gas emissions

Liability

☑ Exposure to sanctions and litigation
☑ Non-compliance with regulations and legislation
☑ Regulation and supervision of environmental risk in the financial sector
☑ Other liability risk, please specify :Costs of changing the processes of certification in the event of changes to standards

(2.2.2.16) Partners and stakeholders considered

☑ Customers
☑ Employees
☑ Regulators
☑ Suppliers

(2.2.2.17) Has this process changed since the previous reporting year?

☑ No

(2.2.2.18) Further details of process

ISP considers possible adverse impact of climatic and environmental events on its premises, business continuity and legal risks and identifies the operational events related to these risks within the Loss Data Collection process. Operational Risk Assessment process evaluates, via climate and environmental risk scenarios, possible losses deriving from premises' damage, interruptions to operations and any legal liability. To protect business continuity, impact of physical risks on IT centers and sites is assessed, identifying alternative locations for disaster recovery. Since 2023, a tool has been used to determine the exposure level of ISP's real estate assets to key territorial and climate change risks, such as floods, hydrogeological risk, drought, forest fires. The platform geolocates each asset of ISP and calculates the exposure index for each risk, based on data from national and international certified sources, e.g.: SwissRE, Copernicus, IGNV, ISPRA, Civil Protection. It also identifies buildings wholly/partially located in areas listed in the World Database on Protected Areas (WDPA), including Natura 2000 sites. The activities carried out by Intesa Sanpaolo at the Group's offices do not generally have an impact on biodiversity. However, a screening assesses ISP's offices potentially located in or near areas of high naturalistic value. The Risk Assessment Document evaluates workers' health and safety risks and assesses hydrogeological risk due to flooding and landslides for over 2,600 real estate assets in Italy and more than 1,000 among foreign assets. These assessments, matched with daily analysis of Arpa's weather alert bulletins and those from the Department of Civil Protection on critical national and regional issues, enable ISP to implement actions that consider critical events connected with phenomena deriving from climate change, permitting to manage different potential risk scenarios, indicated in the Emergency Plans, to mitigate and reduce potential damage, in particular for workers and Stakeholders. Since 2024, the platform has been in place to 1) enable computerised emergency events management, 2) include a broader range of physical and geographical risks and 3) extend functionality to foreign branches and offices; additional features are also underway to provide an overall index of exposure to geographical and climate risks for each real estate asset. Context Analysis of the HSE Management System (ISO45001-14001-50001 compliant) also considers climate-related risks. UPSTREAM VALUE CHAIN: climate-related risks and opportunities influence ISP supply chain strategy: purchasing and partnership decisions to reduce climate risks and maximise related opportunities over time. ESG suppliers' mgmt approach includes environmental aspects and is monitored through the Suppliers' Gate (SG) portal, which centralises sourcing, regulatory monitoring, qualification, monitoring, and adaptation of contractual standards. The selection occurs during the registration to the portal through an assessment that analyses suppliers' environmental and climate change compliance. At end of 2025,~10,000 suppliers had completed the registration procedure on the SG portal and a subset of~5,200 were qualified and monitored by Group Procurement. By the end of 2025, 100% of qualified suppliers engaged within the centralised purchasing model had completed the questionnaire and obtained an ESG evaluation, thereby achieving the target (vs 86% in 2024).

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

	Process in place covering this portfolio	Dependencies and/or impacts related to this portfolio evaluated in this process
Banking (Bank)	☑ Yes	☑ Both dependencies and impacts
Investing (Asset manager)	☑ Yes	☑ Both dependencies and impacts
Investing (Asset owner)	☑ Yes	☑ Both dependencies and impacts
Insurance underwriting (Insurance company)	☑ Yes	☑ Both dependencies and impacts

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

	Process in place covering this portfolio	Risks and/or opportunities related to this portfolio are evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Banking (Bank)	☑ Yes	☑ Both risks and opportunities	☑ Yes

	Process in place covering this portfolio	Risks and/or opportunities related to this portfolio are evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Investing (Asset manager)	☑ Yes	☑ Both risks and opportunities	☑ Yes
Investing (Asset owner)	☑ Yes	☑ Both risks and opportunities	☑ Yes
Insurance underwriting (Insurance company)	☑ Yes	☑ Both risks and opportunities	☑ Yes

(2.2.6) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

Banking (Bank)

(2.2.6.1) Environmental issue

☑ Climate change
☑ Forests
☑ Water
☑ Biodiversity

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

☑ Dependencies
☑ Impacts

☑ Risks
☑ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(2.2.6.6) Frequency of assessment

☑ More than once a year

(2.2.6.7) Time horizons covered

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.8) Integration of risk management process

☑ Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

☑ Site-specific
☑ Local
☑ Sub-national
☑ National

(2.2.6.10) Tools and methods used

☑ Portfolio temperature alignment
☑ Risk models
☑ Scenario analysis
☑ UNEP FI Portfolio Impact Analysis Tool for Banks
☑ Other, please specify :Internal ESG Score, LEAP (Locate, Evaluate, Assess and Prepare) approach

(2.2.6.11) Risk type and criteria considered

☑ Acute physical
☑ Drought
☑ Heat wave
☑ Landslide
☑ Wildfires
☑ Cold wave/frost
☑ Cyclone, hurricane, typhoon
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)

Chronic physical

☑ Heat stress

☑ Water stress

☑ Sea level rise

☑ Coastal erosion

☑ Changing wind patterns

☑ Temperature variability

☑ Changing temperature (air, freshwater, marine water)

☑ Changing precipitation patterns and types (rain, hail, snow/ice)

(2.2.6.12) Partners and stakeholders considered

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

(2.2.6.13) Further details of process

ISP within its activity considers, with different levels of detail, all topics flagged. Identification of Climate/Environmental(C&E) risks is ongoing. Approach for managing and mitigating C&E risks is based on common definitions of risk drivers and transmission channels (risk taxonomy) and defines appropriate models to measure the effects of the drivers on risk families(Credit,Liquidity,Market,Operational).The integrated approach has 4 parts:1.Integration of C&E risks into the risk mgmt framework;2.Identification of the main climate-related and environmental risk taxonomy, risk drivers, transmission channels and potential impacts on the Group (including ESG materiality, sectoral/country assessment, scenario analysis, business environment scan, stress testing); 3.Management and mitigation: definition of policies to limit financing for high ESG risk activities;KRI/thresholds and actions to contain ESG risks in the RAF with controls of strategic guidelines considering evidence from stress testing and scenario analysis both of which assess climate risks impacts in the sml term;integration of specific ESG risk assessment into credit granting processes and definition of credit strategies driven by ESG risks and opportunities; ESG and reputational risk clearing process; 4.monitoring and disclosure:C&E risk disclosure according to Regulations and supervisory expectations (e.g.ICAAP, Pillar 3) and other internal reporting.ISP has also developed an holistic approach for ESG/Climate factors integration within the credit framework:definition of sectoral strategies considering ESG risks and opportunities(ESG Sectoral Color Coding)of sectors/subsectors' economic activities.ISP defined an ESG score at counterparty level to assess the ESG profile of corporate/SME customers. The integration within the risk mgmt framework of "other environmental risks" (or Nature-related Risks, i.e. financial risks from the impact on biodiversity/from dependencies related to natural capital or ecosystem services) evolved from 2023 preliminary assessment exercise, based on TNFD guidelines and LEAP process, and has become part of the overall risk mgmt measurement and monitoring framework. The methodology considers a set of risk drivers (e.g. air pollution, water stress, and crop and timber provisioning) at single borrower (bottom-up) level within the risk evaluation scores. This methodology is an evolving framework, continuously refined through best practices.

Investing (Asset manager)

(2.2.6.1) Environmental issue

☑ Climate change
☑ Forests
☑ Water
☑ Biodiversity

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

☑ Dependencies
☑ Impacts
☑ Risks
☑ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

☑ Retail
☑ Apparel
☑ Services
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure

☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Power generation
☑ International bodies

(2.2.6.6) Frequency of assessment

☑ Annually

(2.2.6.7) Time horizons covered

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.8) Integration of risk management process

☑ Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

☑ Site-specific
☑ Sub-national
☑ National

(2.2.6.10) Tools and methods used

☑ Portfolio temperature alignment
☑ Risk models
☑ Scenario analysis
☑ Stress tests
☑ Other, please specify :Internal tools based on external databases

(2.2.6.11) Risk type and criteria considered

Acute physical
☑ Drought
☑ Tornado
☑ Avalanche
☑ Heat wave
☑ Landslide
☑ Wildfires
☑ Cyclone, hurricane, typhoon
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical
☑ Heat stress
☑ Water stress
☑ Sea level rise
☑ Coastal erosion
☑ Declining water quality
☑ Changing precipitation patterns and types (rain, hail, snow/ice)
☑ Temperature variability
☑ Increased ecosystem vulnerability
☑ Precipitation or hydrological variability
☑ Increased severity of extreme weather events
☑ Changing temperature (air, freshwater, marine water)

Policy
☑ Carbon pricing mechanisms
☑ Changes to national legislation

Market
☑ Inability to attract co-financiers and/or investors due to uncertain risks related to the environment

Reputation

☑ Investing that could create or contribute to systemic risk for the economy

Technology

☑ Lack of access to data or monitoring systems

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations and legislation

☑ Regulation and supervision of environmental risk in the financial sector

(2.2.6.12) Partners and stakeholders considered

☑ Customers

☑ Employees

☑ Investors

☑ Local communities

☑ Regulators

(2.2.6.13) Further details of process

To assess the main adverse effects of investment decisions and advice on sustainability factors and identify mitigation actions, Eurizon has established a framework defining how Principal Adverse Impact indicators (PAIs) are considered in managed assets, under the Regulatory Technical Standards (RTS) of the SFDR. Where issuers/investments show negative impacts on sustainability factors, targeted engagement or divestment may be considered. Eurizon has adopted a policy for selecting and monitoring financial instruments integrating sustainability risks analysis and management into the investment process. As an additional tool supporting investments, Eurizon uses the proprietary "Eurizon ESG Score", combining the ESG Risk Score, estimating the ESG impact of each issuer's business and its effect on profit generation and the ESG Opportunity Score, estimating issuers' ability to leverage sustainable growth opportunities by generating future profits. Eurizon considers ecological thresholds and environmental tipping points through climate-risk integration, PAI monitoring, ESG scoring methodologies, Net Zero commitments and stewardship initiatives,including CA100+ and NA100. Eurizon has implemented a Transition Risk model to assess climate change impacts on corporate and sovereign issuers. The model quantifies transition scenario impacts on business activities, financial performance and carbon emissions by combining scenario inputs with operational and financial data through a bottom-up analysis of operations, asset profiles and financials. The physical risk model integrates climate and econometric models to calculate climate-adjusted revenues, costs, profits, and cash flows, supporting the company's calculation of the "Physical Climate-adjusted

value". NatureWatch, Eurizon's internal screening methodology introduced in 2024 (inspired by Kunming-Montreal Global Biodiversity Framework), identifies companies operating in/near biodiversity-sensitive areas with potential negative impacts to prioritise engagement with those most at risk. Eurizon evolved its methodology for defining 'sustainable' issuers under the SFDR by verifying biodiversity-related thresholds (i.e. operations in biodiversity-sensitive areas, etc).

Investing (Asset owner)

(2.2.6.1) Environmental issue

☑ Climate change
☑ Biodiversity

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

☑ Dependencies
☑ Impacts
☑ Risks
☑ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

☑ Retail
☑ Apparel
☑ Fossil Fuels
☑ Manufacturing

☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Infrastructure
☑ Power generation
☑ International bodies

(2.2.6.6) Frequency of assessment

☑ Annually

(2.2.6.7) Time horizons covered

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.8) Integration of risk management process

☑ Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

☑ Local
☑ National

(2.2.6.10) Tools and methods used

☑ Portfolio temperature alignment
☑ Scenario analysis
☑ Stress tests
☑ WWF Biodiversity Risk Filter

(2.2.6.11) Risk type and criteria considered

Acute physical
☑ Drought
☑ Tornado
☑ Heat wave
☑ Landslide
☑ Wildfires
☑ Cyclone, hurricane, typhoon
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical
☑ Heat stress
☑ Sea level rise
☑ Coastal erosion
☑ Increased severity of extreme weather events
☑ Changing temperature (air, freshwater, marine water)
☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation

(2.2.6.12) Partners and stakeholders considered

☑ Customers
☑ Employees
☑ Investors
☑ Suppliers
☑ Regulators
☑ Local communities

(2.2.6.13) Further details of process

ISPA Group has adopted guidelines to integrate sustainability risks and impacts on sustainability factors throughout the investment process. ESG aspects are integrated into investments underlying insurance products through the Policy for incorporating ESG factors/principles of Sustainable and Responsible Investments (SRI) within the investment process. The Policy sets exclusions/restrictions for issuers operating in sectors deemed not socially responsible, including companies deriving at least 15% of turnover from thermal coal mining/electricity production or at least 10% from unconventional oil & gas extraction; involved in new thermal coal projects, including coal-fired power plants, coal mines and related infrastructure even in the pre-construction phase. The Policy also provides for the gradual reduction of the carbon intensity of direct investment portfolios for segregated, internal and pension funds and includes a Principal Adverse Sustainability Impact (PAI) Policy describing measures adopted to mitigate adverse sustainability impact associated with its investments. Among the climate/environment-related indicators: GHG emissions; Carbon footprint; Investee companies' GHG intensity; Exposure to fossil fuel companies; Share of non-renewable energy consumption and production; Energy consumption intensity in high climate impact sector; Activities negatively affecting biodiversity-sensitive areas; Emissions to water; Investments in companies without carbon emissions reduction initiatives. For Direct Investments in segregated and own funds, intermediate targets have been set to reduce Carbon Intensity EVIC by 50% by 2029, with reporting in 2030. Progress is monitored quarterly through the RAF. The ORSA 2026 based on FY2025 includes a qualitative biodiversity materiality analysis based on info-provider data to conduct an initial assessment of the corporate portfolio's exposure to biodiversity-related risks. Key sub-themes including water, deforestation, pollution, waste and physical hazards were mapped in line with the division into four realms of nature and the TNFD framework. Among the factors analysed, the most relevant concerns investments in companies operating in biodiversity-sensitive areas, affecting half of the corporate portfolio. However, exposure alone doesn't imply material financial risk. As no additional biodiversity-related risk drivers were identified on the asset side, biodiversity is not considered material from a risk perspective.

Insurance underwriting (Insurance company)

(2.2.6.1) Environmental issue

☑ Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

☑ Impacts
☑ Risks
☑ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(2.2.6.6) Frequency of assessment

☑ Annually

(2.2.6.7) Time horizons covered

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.8) Integration of risk management process

☑ Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

☑ Sub-national

(2.2.6.10) Tools and methods used

☑ External consultants
☑ Risk models
☑ Scenario analysis

(2.2.6.11) Risk type and criteria considered

Acute physical
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Heavy precipitation (rain, hail, snow/ice)

(2.2.6.12) Partners and stakeholders considered

☑ Customers
☑ Employees
☑ Investors
☑ Suppliers
☑ Regulators
☑ Local communities

(2.2.6.13) Further details of process

The Non-Life companies of ISP Assicurazioni Group face higher physical climate risks compared to Life business companies, which are more exposed to reputational and transition risks. Intesa Sanpaolo Protezione S.p.A. (hereinafter "ISPP") has assessed the impact of severe climate events, like hail and floods, that have affected part of Italy in the recent years and the potential increase in their likelihood in the future. The Solvency II Lines of Business (LoBs) most exposed to climate change effects include: LoB 5 Other motor insurance, LoB 7 Fire and other damage to property insurance. Based on the product catalogue of the insurance company and the scope of the climate change risk, these LoBs are the ones associated with the highest amount of gross written premiums in the reporting year. The materiality assessment is summarised in a materiality matrix and, subsequently, assessments are made of the impacts on the Group's financial statements to identify the variables to be stressed in the scenario analysis. For the purposes of the physical risk analyses, available data were used such as: - ESG performance mapping defined as part of the ESG project; - mapping of so-called "NatCat" (natural catastrophe events) guarantees with reference to risks covered by Standard Formula assessments, with a focus on flood and hail guarantees; - volume of premiums and claims by branch/guarantee/performance gross and net of reinsurance. On the liability side, no specific stresses were performed on transition risk. Considering the various risk categories analysed, it's assumed that acute physical risks could impact insurance liabilities in the short, medium and long term. By analysing key exposures in CRESTA (Catastrophe Risk Evaluation and Standardizing Target Accumulations) zones, provincial level, and performing a climate stress test, it was confirmed that hail peril is the most significant and potentially impactful risk. For the hail peril, the RCP 8.5 climate scenario analysis (projected to 2050) predicted an increase of the claims for each LoB which was obtained applying stress frequency factors, estimated using a regression model. The model considers reinsurance policies in force during the reporting year and the potential increase in reinsurance cost due to the applied scenario. The risks transfer to reinsurers has allowed companies to mitigate this kind of risk.

Insurance underwriting (Insurance company)

(2.2.6.1) Environmental issue

☑ Biodiversity

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

☑ Dependencies

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

12

(2.2.6.4) Type of assessment

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(2.2.6.6) Frequency of assessment

☑ Annually

(2.2.6.7) Time horizons covered

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.9) Location-specificity used

☑ Local

(2.2.6.10) Tools and methods used

☑ WWF Biodiversity Risk Filter

(2.2.6.12) Partners and stakeholders considered

☑ Customers
☑ Employees
☑ Investors
☑ Suppliers
☑ Regulators
☑ Local communities

(2.2.6.13) Further details of process

In the ORSA 2026 (based on FY2025) a preliminary qualitative analysis on biodiversity was included for the first time also on liability side. This analysis was based on a series of qualitative factors provided by the info-provider, aiming to conduct an initial assessment on a subset of portfolio to analyse the exposure to biodiversity-related risks. Specifically, key sub-themes such as water, deforestation, pollution, waste and physical hazards were mapped, aligned with the division into four realms of nature (ocean, land, freshwater, and atmosphere) and the conceptual framework proposed by the Taskforce on Nature-related Financial Disclosures (TNFD). The 12% coverage reflects the current availability of data from the external data provider across the assessed portfolio. Coverage is therefore constrained by data availability for the underlying counterparties.

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

In relation to the interconnections, since 2023 ISP has started to enhance the tool dedicated to impacts on its direct operations. In fact, Intesa Sanpaolo is committed to analysing and containing possible risks on its properties as well as taking immediate action in the event of environmental disasters. To this end, in line with the content of the 2022-2025 Business Plan, a specific tool was identified in 2023 which allows to determine the exposure level of ISP's real estate assets to key territorial and climate change risks, such as floods, hydrogeological risk, drought, forest fires. The platform geolocates each asset of Intesa Sanpaolo and calculates the exposure index for each risk, based on data from national and international certified sources.,e.g.: SwissRE, Copernicus, IGNV, ISPRA, Civil Protection. It also identifies buildings wholly/partially located in areas listed in the World Database on Protected Areas (WDPA), including Natura 2000 sites. The activities carried out by Intesa Sanpaolo at the Group's offices do not generally have an impact on biodiversity. However, a screening assesses ISP's offices potentially located in or near areas of high naturalistic value. The Risk Assessment Document evaluates workers' health and safety risks and assesses hydrogeological risk due to flooding and landslides for over 2,600 real estate assets in Italy and more than 1,000 among foreign assets. These assessments, matched with daily analysis of Arpa's weather alert bulletins and those from the Department of Civil Protection on critical national and regional issues, enable ISP to implement actions that consider critical events connected with phenomena deriving from climate change, permitting to manage different potential risk scenarios, indicated in the Emergency Plans, to mitigate and reduce potential damage, in particular for workers and Stakeholders. Since 2024, the platform has been in place to 1) enable computerised emergency events management, 2) include a broader range of physical and geographical risks and 3) extend functionality to foreign branches and offices; additional features are also underway to provide an overall index of exposure to geographical and climate risks for each real estate asset. Context Analysis of the HSE Management System (ISO45001-14001-50001 compliant) also considers climate-related risks.

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

	We consider environmental information
Banking (Bank)	☑ Yes
Investing (Asset manager)	☑ Yes
Investing (Asset owner)	☑ Yes
Insurance underwriting (Insurance company)	☑ Yes

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

Banking (Bank)

(2.2.9.1) Environmental issues covered

☑ Climate change
☑ Forests
☑ Water

(2.2.9.2) Type of environmental information considered

☑ Emissions data
☑ TCFD disclosures
☑ Energy usage data
☑ Climate transition plans
☑ CDP questionnaire response
☑ Emissions reduction targets
☑ Science-Based Net-Zero Targets
☑ Exposure to acute physical risks
☑ Exposure to chronic physical risks

(2.2.9.3) Process through which information is obtained

☑ Directly from the client/investee
☑ Data provider
☑ Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

100

(2.2.9.6) Total portfolio value covered by the process

430658000000

Investing (Asset manager)

(2.2.9.1) Environmental issues covered

☑ Climate change

(2.2.9.2) Type of environmental information considered

☑ CDP scores
☑ Emissions data
☑ TCFD disclosures
☑ Energy usage data
☑ Climate transition plans
☑ CDP questionnaire response
☑ Emissions reduction targets
☑ Science-Based Net-Zero Targets

(2.2.9.3) Process through which information is obtained

☑ Directly from the client/investee
☑ From an intermediary or business partner
☑ Data provider
☑ Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

☑ Retail
☑ Apparel
☑ Fossil Fuels
☑ Manufacturing

☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Infrastructure
☑ Power generation
☑ International bodies

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

100

(2.2.9.6) Total portfolio value covered by the process

562000000000

Investing (Asset owner)

(2.2.9.1) Environmental issues covered

☑ Climate change

(2.2.9.2) Type of environmental information considered

☑ Emissions data
☑ TCFD disclosures
☑ Energy usage data
☑ Climate transition plans
☑ Emissions reduction targets
☑ Science-Based Net-Zero Targets

(2.2.9.3) Process through which information is obtained

☑ Directly from the client/investee
☑ Data provider
☑ Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

100

(2.2.9.6) Total portfolio value covered by the process

181108000000

Insurance underwriting (Insurance company)

(2.2.9.1) Environmental issues covered

☑ Climate change

(2.2.9.2) Type of environmental information considered

☑ Other, please specify :CAT monitoring and Stress Test ORSA

(2.2.9.3) Process through which information is obtained

☑ Data provider
☑ Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

☑ Retail
☑ Apparel
☑ Services
☑ Hospitality
☑ Infrastructure
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

1

(2.2.9.6) Total portfolio value covered by the process

17530000

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

☑ Qualitative
☑ Quantitative

(2.4.2) Indicator used to define substantive effect

☑ Credit risk

(2.4.3) Change to indicator

☑ % decrease

(2.4.4) % change to indicator

☑ 1-10

(2.4.6) Metrics considered in definition

☑ Frequency of effect occurring
☑ Likelihood of effect occurring

(2.4.7) Application of definition

ISP, for Climate Change issues, considers substantive financial risks, those affecting, or potentially affecting, the development of the undertaking, its financial position, performance and cash flows, access to finance or cost of capital in the short, medium or long term. The risks are identified based on the impacts, dependencies and sustainability issues that have or could have financial effects on the Group. For risk assessment purposes, the analysis is carried out based on the potential magnitude of the financial effects arising from risks and on the likelihood of occurrence, that indicates how likely a risk is to occur. The financial effects are assessed based on two drivers: (a) the Group's exposure to the counterparties in the portfolio and financial institutions that issue debt securities that belong to sectors or countries potentially exposed to ESG risk factors; (b) the effects arising from the Group's inadequate operating processes, including assets, resources and relationships (internal and external) that form part of its own operations, or by the threat of penalties or penalties applied in respect of sustainability issues. Magnitude and likelihood of occurrence and the consequent assessment of the financial effects of risks are determined considering both qualitative and quantitative elements. To define the share of high risk corporate and SME exposures in relation to the investigated sustainability areas, that risk is considered material where the share of exposures associated with high-risk counterparties exceeds 10%. The scope is the Corporate/SME segment credit portfolio and the benchmark threshold is determined by considering the percentage of exposures with a high ESG risk in relation to total corporate/SME exposures. With reference to time horizons these include and factor in short, medium and long term time elements.

Opportunities

(2.4.1) Type of definition

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

☑ Market share

(2.4.3) Change to indicator

☑ % increase

(2.4.4) % change to indicator

☑ 1-10

(2.4.6) Metrics considered in definition

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

The materiality assessment with reference to business development opportunities is determined based on Budget/Business Plan KPIs in relation to disbursement/placement of products dedicated to customers' Climate and Environmental transition, where financing volumes are expected to be substantive. Materiality is determined considering the amount of dedicated products compared to the total or the presence of dedicated Budget/Business Plan KPI. The materiality threshold is 10% of the disbursement of dedicated products or the presence of dedicated KPIs. Short and medium term analyses are carried out by taking into consideration both Budget and Business Plan KPIs respectively. With reference to Long Term the analysis takes into account an incidence of loan disbursements not lower than that included in the budget/Business Plan.

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

☑ Yes, both within our direct operations or upstream value chain, and within our portfolio

Forests

(3.1.1) Environmental risks identified

☑ Yes, only in our portfolio

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

In relation to direct operations and upstream value chain, no material risks were identified. As a financial institution, considering the specific features of the Group's core business, the fact that Intesa Sanpaolo offices are not located in protected or high-biodiverse areas, as well as the feedback from interviews with competent organisational units, no risks were identified regarding any direct impact on biodiversity loss and the extent and condition of ecosystems. Regarding the upstream value chain materiality assessment (performed for the Sustainability Statement), this focused primarily on the existence of suppliers that adopt less structured controls with regard to the environmental matters considered; however, no significant risks were identified.

Water

(3.1.1) Environmental risks identified

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

As a financial institution, water-related risks are present only in a limited share of Intesa Sanpaolo portfolio. The materiality assessment (performed for the Sustainability Statement) found that the "Water" topic was not material at Group level, both in terms of impact and financial materiality. No risks connected with water were identified in relation to the Group's own operations, considering the specific features of its core business and based on interviews with the relevant organisational units. Regarding the upstream value chain, the assessment focused primarily on the existence of suppliers that adopt less structured controls with regard to the environmental matters considered; however, no significant risks were identified. Similarly, for the downstream value chain, the analysis focused on the Group's portfolio to assess exposure to counterparties characterised by poor practices in relation to the environmental matters considered (for example, potentially arising from events related to pollution, the use of polluting substances and the use of marine water resources as well as from threats to biodiversity, the balance of the relevant ecosystems and the circular economy); however, no significant risks were identified.

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

☑ Risk10

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to regulation of existing products and services

(3.1.1.4) Value chain stage where the risk occurs

☑ Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Credit risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

In ISP, transition risk is assessed with different methodologies, depending on the sector being analysed. A sector specific methodological framework is adopted for Oil & Gas – large corporate clients operating in the most representative geographical areas of ISP's credit portfolio (e.g. Italy, US, UK and Germany). For each client in the scope of the assessment, the balance-sheet and Profit & Loss items for the different time horizons considered are simulated prospectively by including the impacts from the climate transition (in a disorderly scenario). The credit quality of each company is assessed, and synthetic indicators of riskiness are identified as a function of its worsening in rating and creditworthiness. Transition risk impacts are different according to the business profile of the individual client. Clients whose business depends on emissions-intensive fossil fuel extraction (extraction and processing of oil or natural gas) are subject to intense demand stress already in the

short to medium-term (until 2031), due to both shifts in consumer preferences and regulatory pressure impacting the end-use cost of the product. Clients operating in the natural gas value chain (distribution, marketing) are exposed to less immediate transition risk (mainly in the medium- and long-term).

(3.1.1.10) % of portfolio value vulnerable to this risk

☑ 1-10%

(3.1.1.11) Primary financial effect of the risk

☑ Increased credit risk

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ Likely

(3.1.1.14) Magnitude

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Intesa Sanpaolo's exposure to Oil & Gas sector (gross carrying amount), upstream operators and integrated players exposed to high and very high transition risk, is equal to 97,865,906 euro at 31/12/2025. Intesa Sanpaolo responded to this risk by developing an exclusion/restriction policy on the Oil&Gas sector, initially adopting the “Rules for Lending Operations in the Unconventional Oil&Gas Sector” in July 2021, which were replaced by the broader "Rules on Oil&Gas sector" in April 2024. These rules also anticipated the phase-out achieved in 2025 of any existing exposures to unconventional Oil&Gas resources subject to exclusion in accordance with

the policy. In addition, Intesa Sanpaolo attentively monitors the exposure of the credit portfolio to this sector, where 2030 target was set in 2022. The maximum amount represents the above-mentioned exposure of Intesa Sanpaolo (gross carrying amount) to the upstream operators and integrated players in the Oil&Gas sector exposed to high and very high transition risk in the long term. On the other hand, the minimum loss is estimated at 1 euro in case the disorderly scenario considered as the basis of the estimates of the financial effect, does not occur.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

1

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

97865906

(3.1.1.25) Explanation of financial effect figure

The maximum amount represents the exposure of Intesa Sanpaolo (gross carrying amount) to the upstream operators and integrated players in the Oil&Gas sector exposed to high and very high transition risk in the long term at 31/12/2025. The change in this value compared with CDP 2025 is driven by methodological change, especially a revision of the sectoral classification, rather than increased exposure to the Oil & Gas sector. On the other hand, the minimum loss is estimated at 1 euro in case the disorderly scenario considered as the basis of the estimates of the financial effect, does not occur.

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with customers

(3.1.1.27) Cost of response to risk

794400

(3.1.1.28) Explanation of cost calculation

The cost calculation includes: - 4 FTEs of the Chief Risk Officer Area for the risk assessment; - 4 FTEs of the Chief Sustainability Office Area for the analysis of macrotrends; -4 FTEs in the business units for the engagement with customers. For a total of 12 FTEs with an estimated gross cost of 66,200 euro yearly each for a total cost of response equal to 794,400 euro.

(3.1.1.29) Description of response

ISP responded to this risk by carrying out the following activities: -Develop a commercial proposition to support companies' transition plans and sustainability and circular economy (e.g. design and development of the necessary documentation and contracts for the lending solutions, developing marketing and communication strategies to promote the solutions, and training relevant staff members on the lending solutions, their features, and the evaluation process etc) -Sign partnerships with providers in the energy sector to originate new lending volumes favouring the Green Transition (assessment of potential partner based on reputation and commitment to sustainability, creation of a detailed implementation plan, continuous monitoring and evaluation of the performance of the partnership, etc) -Monitoring of sector exposures within the risk management processes.

Forests

(3.1.1.1) Risk identifier

☑ Risk11

(3.1.1.2) Commodity

Forests commodity

☑ Other, please specify :the analysis has been conducted on the Non Financial Corporations (NFC) portfolio, regardless of sector and commodity

(3.1.1.3) Risk types and primary environmental risk driver

Reputation

☑ Other reputation risk, please specify :lending to counterparties belonging to sectors that depend on ecosystem services and to industries that have a potentially negative impact on specific issues

(3.1.1.4) Value chain stage where the risk occurs

☑ Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Credit risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

The risk arises in the downstream value chain where ISP is exposed to credit risk from counterparties dependent on ecosystem services or impacting biodiversity. Environmental risks stem from 1)impacts on nature: changes in natural capital caused by business activities, affecting nature's ability to provide social/economic functions; 2) dependencies on nature:ecosystem services necessary for business processes. Following the 2023 pilot assessment, the integration of "other environmental risks" became part of the overall risk management, measurement and monitoring framework. The methodology focuses on Non-Financial Corporations (NFC) counterparties and includes a sensitivity analysis estimating the impact of the introduction of a tax on land consumption on counterparties' financial statements. For a more prudential assessment, companies vulnerable to Crop and Timber Provisioning issues are also considered, in addition to those with NACE A1, A2, A3. In 2025, ISP published "Rules on Biodiversity and Nature" outlining its approach to biodiversity and nature also in lending activities. These set criteria to avoid financing activities/projects: a) Located in Ramsar Wetlands, IUCN protected areas I–VI, Alliance for Zero Extinctions sites, UNESCO high biodiversity areas; b) Controversial for biodiversity-related impacts/dependencies; c) Located in countries that haven't ratified key environmental conventions and relate to activities harmful to biodiversity, nature, pollution, water.

(3.1.1.10) % of portfolio value vulnerable to this risk

☑ 1-10%

(3.1.1.11) Primary financial effect of the risk

☑ Increased credit risk

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ Likely

(3.1.1.14) Magnitude

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Intesa Sanpaolo has an exposure to counterparties dependent on ecosystem services or impacting biodiversity at high risk and very high risk, equal to 5,012,944,764 euro at 31/12/2025. The assessment has been performed on the 31/12/2025 financial statements; the anticipated financial effect of the risk is calculated based on the Nature-related Risks ("NRR") analysis which, following the 2023 pilot assessment, has been integrated into the overall risk management, measurement and monitoring framework and is currently in use. In particular, it is the outcome of a sensitivity analysis estimating the impact of the introduction of a tax on land consumption on counterparties' financial statements. For a more prudential assessment, companies vulnerable to Crop and Timber Provisioning issues are also considered, in addition to those with NACE A1, A2, A3. The maximum amount represents the exposure of Intesa Sanpaolo (gross carrying amount) to the counterparties exposed to high and very high risk in the long term at 31/12/2025. On the other hand, the minimum loss is estimated at 1 euro in case the scenario considered as the basis of the estimates of the financial effect does not occur.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

1

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

5012944764

(3.1.1.25) Explanation of financial effect figure

The maximum amount represents the exposure of Intesa Sanpaolo (gross carrying amount) to counterparties dependent on ecosystem services or impacting biodiversity exposed to high and very high risk in the long term at 31/12/2025. On the other hand, the minimum loss is estimated at 1 euro in case the scenario considered as the basis of the estimates of the financial effect does not occur.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Other policies or plans, please specify :set exclusion, heightened assessment and risk monitoring criteria for lending to new projects and counterparties.

(3.1.1.27) Cost of response to risk

264800

(3.1.1.28) Explanation of cost calculation

The activities of developing the Rules on Biodiversity and Nature, as well as monitoring the related exclusion criteria, are carried out by various departments of Intesa Sanpaolo, including the Chief Risk Officer (CRO) Area and the Chief Sustainability Officer (CSO) Area. Intesa Sanpaolo estimates that these activities require an annual overall commitment of 4 FTEs with an estimated gross cost of 66,200 euro per FTE per year (2 FTEs from the Chief Risk Officer (CRO) Area and 2 FTEs from the Chief Sustainability Officer (CSO) Area), for a total cost of response equal to 264,800 euro.

(3.1.1.29) Description of response

To respond to the risk on biodiversity, Intesa Sanpaolo Group has defined and adopted an integrated approach to biodiversity and nature-related issues, applying specific criteria included in the "Guidelines for the Governance of ESG risks" and in the "Rules on biodiversity and nature" to avoid the financing of activities and/or projects with particularly significant environmental impacts also related to Biodiversity ecosystems. With the goal of directing exposures towards the protection and conservation of biodiversity and nature, the Group is committed to not financing new projects with at least one of the following characteristics: a) Located in geographic areas defined by: Wetlands under the Ramsar Convention; IUCN protected areas I to VI - areas designed for the long-term conservation of nature including nature reserves, national parks, natural monuments, species or habitat conservation areas and both terrestrial and marine protected areas; Alliance for Zero Extinctions (AZE) which includes sites hosting the last remaining populations of 1,620 of the most threatened species on Earth; Natural World Heritage sites (UNESCO) which identifies the main terrestrial and marine natural areas characterised by a high biodiversity rate; b) Categorised as 'controversial' due to their impacts or dependencies on biodiversity and nature, which may also expose the Bank to a significant reputational risk; c) Located in countries that have not ratified important environmental conventions (i.e., so-called 'red countries') and related to economic activities that may have a negative potential impact on biodiversity, nature, pollution and water. In addition, the Group commits not to finance counterparties that have their registered office in the so-called 'red countries' and that are involved in economic activities with potential impact on biodiversity, nature, pollution and water.

Climate change

(3.1.1.1) Risk identifier

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

☑ Direct operations

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Operational risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

Italy is one of the EU countries most affected by landslides, with 620,808 landslides (area of 23,700 km2 - 7.9% of the national territory). These data derive from the Inventory of Landslide Phenomena in Italy carried out by ISPRA (Higher Institute for Environmental Protection and Research) and by the Regions and Autonomous Provinces according to standardised methods. Italy is the EU country most exposed to risk of flood due to the morphological characteristics of the national territory, where spaces granted to the hydrographic network by the mountain ranges and the sea are modest, exposed to sudden floods or flash floods, often triggered by short and intense weather phenomena. In Italy, ISPRA creates the mosaic of areas with hydraulic hazard delineated by the District Basin Authorities and the level of hazard is obtained by assuming a flood that has average return times. For assets located in other countries, different sources are used provided by CatNet®, a proprietary tool developed by Swiss Re. Extreme precipitations and floods can have an adverse impact on ISP: they could cause damages to ISP premises, data centres and put at risk the possibility of commuting of employees. Referring to the ISPRA's hazard areas, ISP has evaluated that, out of a total of over 2,600 real estate assets, 108 properties are in areas with high flood risk. Among foreign assets, over 1,000 properties are monitored and at the moment, 57 foreign assets are in high-risk areas for flooding.

(3.1.1.11) Primary financial effect of the risk

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ Likely

(3.1.1.14) Magnitude

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

ISP has long faced the phenomenon of climate risk linked to floods and landslides. As part of the Risk Assessment Document for the Safety and Health of Workers (Italian Law Decree 81/2008) the hydrogeological risk due to flooding and landslide is assessed both in advance and following an external event to maintain the characteristics of usability of the buildings concerned. These evaluations allow ISP in Italy to implement actions in case of critical events linked to natural phenomena due to climate change, through the implementation of various risk scenarios, indicated in the Emergency Plans, to mitigate possible damage, with particular regard to workers and Stakeholders. One of the properties at greatest hydrogeological risk in Italy, considering not only the geographical location but also the strategic nature of the property containing the largest data center, is in the Municipality of Moncalieri (metropolitan area of Turin), where one of the most important data centers of ISP is located, hit several times over the years by the flood of the Po river. These phenomena have increased in recent years. In particular, the event related to the flood of 2016 was greater than those of 2000, 1960 and 1949; in fact, with reference to the level of the Po river in Moncalieri, in 2016 a flow of 2,400 mc/sec was recorded while in the previous episodes the range was 2,000, 2,190 and 2,230 respectively. Taking as a reference the event of 2016, the flooding of the Po river and the Sangone torrent caused the flooding of some buildings at the ISP complex of Moncalieri. In 2016, the event did not affect the building that houses the Data Center, which continued to operate regularly. The estimates of the potential financial impact figure were made, for the maximum amount, on the basis of what could occur in case of flooding of the most important Data center of ISP located in the Piedmont Region (one of the Italian regions most exposed to hydrogeological risk). In the amount considered for the assessment of the worst case (90,965,000 euro), the values of the total Data Center asset, of the distributed information technology, of the connectivity and voice equipment and the recovery costs were taken as reference. For the minimum amount the estimate was made on the basis of the possible occurrence of a slight flood in an Intesa Sanpaolo branch for restoration/drying and painting (40,000 euro) calculated as the average actual annual loss from the analysis of historical data.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

40000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

90965000

(3.1.1.25) Explanation of financial effect figure

The estimates of the potential financial impact figure were made, for the maximum amount, on the basis of what could occur in case of flooding of the most important Data-center of ISP located in the Piedmont Region (one of the Italian regions most exposed to hydrogeological risk). In the amount considered for the assessment of

the worst case (90,965,000 euro), the values of the total Data Center asset, of the distributed information technology, of the connectivity and voice equipment and the recovery costs were taken as reference. For the minimum amount the estimate was made on the basis of the possible occurrence of a slight flood in an Intesa Sanpaolo branch for restoration/drying and painting (40,000 euro) calculated as the average actual annual loss from the analysis of historical data.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Other compliance, monitoring or target, please specify :Implementation of a tool which determines the degree of exposure to the main climate change risks of ISP's real estate assets, including floods. This platform geolocates each asset and calculates the exposure index for each risk

(3.1.1.27) Cost of response to risk

1594000

(3.1.1.28) Explanation of cost calculation

Annual costs related to the inspection of the buildings and to evaluate the connected risks are estimated in 10 FTEs (with average remuneration of 66,200 euro each for a total of 662,000 euro) from Real Estate Department and Safety Department that are in charge of these evaluations and of defining the activities that are necessary for mitigating the risks, plus the advisory costs (about 45,000 euro). To minimise the effects deriving from the Hydrological Risk in Moncalieri's Data Center, following the exceptional event of 2016 and the risk analysis, a prevention project was activated, started in 2018 and completed in 2021. All the interventions cost around 887,000 euro. The overall cost of response to this risk is equal to 1,594,000 euro, including FTEs, advisory costs and costs of interventions.

(3.1.1.29) Description of response

ISP responds to this risk by a stricter monitoring of climate change risks with an impact on its properties, by taking preventive measures as well as taking immediate action in the event of environmental disasters. As regards monitoring, a specific tool was implemented which determines the degree of exposure to the main climate change risks of ISP's real estate assets, including floods and hydrogeological risk. This platform geolocates each asset in the Italian territory and calculates the exposure index for each risk based on data from the main national and international certified sources, such as: SwissRE, Copernicus, IGNV, ISPRA and Civil Protection. The platform is also up and running for international branches and offices and a functionality for the computerised management of emergency events has been developed. The Risk Assessment Document, which evaluates risks to workers' health and safety (Italian Legislative Decree 81/2008), also assesses hydrogeological risk due to flooding and landslides. Two further initiatives are in place: the evaluation of the performance of inspections on a sample of properties in areas of greater hydrogeological risk and activities to mitigate the risk on the Moncalieri's Data Center.

Climate change

(3.1.1.1) Risk identifier

☑ Risk5

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Lack of availability and/or increased cost of raw materials

(3.1.1.4) Value chain stage where the risk occurs

☑ Direct operations

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Operational risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

ISP operates mainly in Italy, that is not self-sufficient from an energy standpoint despite investments in renewable energy in recent years (e.g., Power Purchase Agreement (PPA) contracts). This makes the cost of energy subject to the volatility of international markets. The international geopolitical landscape remains characterised by high levels of instability, driven by the ongoing conflict in Ukraine, tensions and conflicts in the Middle East, and the progressive deterioration of relations among the world's major economic powers. These dynamics are significantly impacting global supply chains, trade flows, and energy security, thereby increasing market uncertainty. Against this backdrop, electricity and gas prices remain subject to high volatility, influenced by both geopolitical risks and developments

in international energy commodity markets. Furthermore, in Italy, the final cost of energy continues to be affected by tax and para-fiscal components, as well as by the investments required for the energy transition and infrastructure. ISP carries on a conservative, risk adverse sourcing strategy that helps in overcoming supply and speculative issues that affected the last few years, as well as entered into two renewable energy (photovoltaic) PPAs.

(3.1.1.11) Primary financial effect of the risk

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ Likely

(3.1.1.14) Magnitude

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In 2025, in line with the market trend, Intesa Sanpaolo Group in Italy was able to achieve a decrease of energy expenditure (electricity and gas) by 19% in comparison with 2024, also through the efficiency actions implemented for reducing energy consumptions. For the current year, Intesa Sanpaolo expects to confirm the positive trend of spending, positioning below the initial cost energy objectives due to optimisation actions and the implementation of the internal sourcing practice.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

84750903

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

275718700

(3.1.1.25) Explanation of financial effect figure

With reference to the Italian part of the Group Intesa Sanpaolo, in order to quantify the financial effect of the risk, the maximum amount is calculated by applying the maximum price recorded in August 2022 to the 2026 energy consumption budgeted, while the minimum value equals the energy cost budget allocated for the current year.

(3.1.1.26) Primary response to risk

Diversification

☑ Other diversification, please specify :Thanks to the “structured price formula” the price will be fixed in advance, trying to catch the best opportunities that the market will offer

(3.1.1.27) Cost of response to risk

7297200

(3.1.1.28) Explanation of cost calculation

The following actions were completed in Italy in 2025 to minimise the impact of an increase of energy consumption: interventions on old thermal power plants with new energy efficient equipment, actions of energy efficiency to reduce electricity and natural gas consumption (about 4,000,000 euro), introduction of an advanced consumption monitoring system in the further new buildings (about 2,900,000 euro). With reference to the management of the actions that must be implemented to reduce this risk, 6 FTEs are considered involved in the managing activities (with an estimated gross annual cost of 66,200 euro each, in total 397,200 euro). Total cost is about 7,297,200 euro.

(3.1.1.29) Description of response

ISP's contracts have been renewed on a biennial basis, maintaining the same approach that has given good results in the past years. Thanks to the "structured price formula" the price is fixed in advance, trying to catch the best opportunities that the market offers. The company continues to implement actions to reduce consumption structurally, also involving various International Subsidiary Banks. With the "Own Emissions Plan", presented in 2022 to the market, the Bank identifies specific medium to long-term actions (2022-2030) aimed at the reduction of natural gas, diesel and traditional electricity; some of the actions envisaged in this Plan are the substitution of gas and diesel boilers with heat pumps, improvement of building insulation, etc. Quarterly monitoring of the actions is foreseen and significant reductions in consumption are expected. The Group will also implement further photovoltaic systems in order to reduce its dependency from purchased electricity.

Climate change

(3.1.1.1) Risk identifier

☑ Risk6

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to regulation of existing products and services

(3.1.1.4) Value chain stage where the risk occurs

☑ Investing (Asset manager) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Market risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

Changes in Italian regulations regarding environmental and sustainable finance issues (national governments have to adopt EU regulations) could force the Group to adapt the existing processes, products and services. In fact, investments in the Coal and Oil&Gas sectors could be particularly affected - due to the role that these sectors have in GHG emissions contribution and accelerating climate change- by regulatory changes, market shifts and reputational risks. By focusing on these industries, Eurizon aims to monitor and mitigate potential impacts on its portfolio (composed by global asset, with a focus on European and Italian market), ensuring financial stability and aligning with global efforts to combat climate change. The Division adopted guidelines that consider sustainability risks and impacts on sustainability factors applying exclusions/restrictions policy to the Investment Universe of the individual assets managed in relation to issuers operating in sectors deemed to be not socially responsible, i.e. those deriving: min. 25% of their turnover from extraction or electricity production activities linked to thermal coal (or 20% of turnover, in presence of expansion plans); min. 10% of their turnover from Oil&Gas extraction activities (Oil sands activities).

(3.1.1.10) % of portfolio value vulnerable to this risk

☑ Less than 1%

(3.1.1.11) Primary financial effect of the risk

☑ Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ About as likely as not

(3.1.1.14) Magnitude

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The adopted policy aims to exclude companies deriving at least 25% of their turnover from extraction or electricity production activities linked to thermal coal (or 20% of turnover, in presence of expansion plans) and at least 10% of their turnover from Oil&Gas extraction (Oil sands activities). Additionally, it can be highlighted that the above-mentioned policy excludes companies in various sectors that negatively impact climate change and not only firms operating in the thermal coal and unconventional oil & gas activities (Oil Sands) sectors, ensuring a comprehensive approach to mitigate environmental risks. This strategy aligns with Eurizon's long-term goal of achieving net-zero greenhouse gas emissions by 2050, as part of our membership in the "Net Zero Asset Managers Initiative" ("NZAMI"). In this regard, in the context of the 'Portfolio Level Reference' target (ambition to reduce the GHG emission intensity of Scope 1 and Scope 2 of the 'Portfolio in Scope' by 50% by 2030), Eurizon monitors the evolution of the Weighted Average Carbon Intensity (WACI, i.e. the revenue-weighted average carbon intensity of the companies considered in the Portfolio in Scope). As of December 2025, the WACI of the Portfolio in Scope is 102.67 tCO2/M compared to 166.47 tCO2/M in 2019, thus decreasing by 38.33% (Scope 1 and 2 emission intensities were considered for the calculation of the WACI).

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

1

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

680000000

(3.1.1.25) Explanation of financial effect figure

The financial effect figure reflects the potential loss from investments in the Oil&Gas and Coal sectors from a climate stress test point of view. Eurizon used a platform from a primary external provider to carry out the assessment of how climate change may affect the valuations of issuing companies. This application is based on a quantitative model developed by a specialised provider. This model quantifies, in percentage terms, the potential impact of different climate scenarios on the market value of a security. For the analysis, the NGFS scenario "Disorderly - Delayed Transition" was used: this scenario limits global warming to below 2°C by 2100 and assumes that annual global emissions do not decrease until 2030. This exposes to a greater physical risk than the Orderly - Net Zero 2050 scenario, due to the delayed introduction of climate policies followed by an aggressive policy response only from 2030. This estimate was derived from a climate stress test, which assessed the loss in market value of investments in this scenario. By applying the "Climate Risk" model to issuers in portfolio belonging to the Oil&Gas and Coal sectors, a stress of about -16% was obtained (the percentage obtained from the stress test is the potential impact of the applied climate scenario – NGFS scenario "Disorderly - Delayed Transition" on the market value of Eurizon's securities for the analysed sectors) that means a loss of about 680 million euro (less than 0.2% of

Eurizon investment portfolio). Compared with CDP 2025, the increase in this value is mainly driven by methodological refinements and the expansion of the assessment perimeter, including a wider coverage of the analysed portfolios. The value of -16% on Eurizon's portfolio demonstrates the high impact of these sub-industries on the climate change, anyway it is lower than the value obtained by applying the same stress test on the whole MSCI ACWI Oil&Gas and Coal sub-industries index, which provides a result of a potential loss of about -27%.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Establish site-specific targets

(3.1.1.27) Cost of response to risk

595800

(3.1.1.28) Explanation of cost calculation

Cost refers to divisions involved in sustainable issues/projects, in particular those proposing tools and methodologies for monitoring/processing/managing sustainability risk indicators. Among others, Risk Management performs measurement of exposure to sustainability risk of products managed, coordinating with Compliance&AML as regards the verification of Operating Limits. It analyses the methods for selecting and monitoring financial instruments, integrating analysis of sustainability risks within Investment Process and impacts of sustainability risks on financial products. Compliance&AML monitors compliance with Sustainability Policy, overseeing application of safeguards by external/internal regulations and oversees compliance with decision-making process and Operating Limits for containing risks of managed portfolios to ESG/SRI issues. Cost includes the 9 FTEs working- on average -in risks activities in the divisions (annual cost of 1 FTE is 66,200 euro).

(3.1.1.29) Description of response

Eurizon has adopted specific guidelines for the consideration of sustainability risks and impacts on sustainability factors within the sphere of management of its investment process. The Policy defines the application of exclusions/restrictions within the Investment Universe of the individual assets managed in relation to issuers operating in sectors that derive at least 25% of their turnover from extraction or electricity production activities linked to thermal coal (or 20% of turnover, in presence of expansion plans) and at least 10% of their turnover from Oil&Gas extraction (Oil Sands) activities. The thresholds described above will be periodically reviewed to become more severe to be aligned with the commitments that Eurizon signed. For issuers with exposure to thermal coal and oil sands extraction sectors below the thresholds, specific engagement activities are carried out which may determine restrictions and/or exclusions from the Investment Universe of the single managed assets; where at the end of the engagement process no positive effects are found, such as the definition of "phase out" plans from the thermal coal and oil sands extraction sectors, Eurizon assesses whether to extend the monitoring period or start the disinvestment process from the managed assets. To further strengthen the commitment to mitigate climate change, on November 1st 2021, Eurizon adhered to the Net Zero Asset Managers Initiative (NZAMI). During 2025, NZAMI launched a review of the initiative. Following the relaunch, Eurizon confirmed its membership and, in line with the new Commitment Statement, updated certain commitments to

reflect both the solidity of the process already undertaken and changes to the reference scenario. In addition, Eurizon is a member of the Institutional Investors Group on Climate Change (IIGCC), the European body for the collaboration of investors on climate change, which acts to promote the reduction of carbon emissions.

Climate change

(3.1.1.1) Risk identifier

☑ Risk7

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to regulation of existing products and services

(3.1.1.4) Value chain stage where the risk occurs

☑ Investing (Asset owner) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Market risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

Changes in Italian regulations regarding environmental and sustainable finance issues (national governments have to adopt EU Reg.) could force the Group to adapt the existing processes, products and services. In fact, investments in the Coal and Oil&Gas sectors could be particularly affected by regulatory changes, market shifts and reputational risks, due to the role that these sectors have in GHG emissions contribution and accelerating climate change. By focusing on these industries, ISP Assicurazioni aims to monitor and mitigate potential impacts on its portfolio (composed by global assets, with a focus on European&Italian market), ensuring financial stability and aligning with global efforts to combat climate change. The Group adopted guidelines that consider risks and impacts on sustainability factors, applying exclusion/restriction policies to the Investment Universe of the individual assets managed in relation to issuers operating in sectors deemed to be not socially responsible, i.e. those deriving:min.15% of their revenues from mining/electricity generation activities related to thermal coal; min.10% of their revenues from

unconventional oil&gas extraction activities; or those involved in new thermal coal projects, including coal-fired power plants, coal mines and related infrastructure, even if in pre-construction phase. For Direct Investments of segregated/own funds intermediate targets were set to reduce Carbon Intensity EVIC by 50% by 2029, with reporting in 2030.

(3.1.1.10) % of portfolio value vulnerable to this risk

☑ Less than 1%

(3.1.1.11) Primary financial effect of the risk

☑ Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Short-term

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ About as likely as not

(3.1.1.14) Magnitude

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The adopted policy - that aims to exclude companies deriving at least 15% of their revenues from mining/electricity generation activities related to thermal coal and at least 10% of their revenues from unconventional oil & gas extraction activities and companies involved in new thermal coal projects, including coal-fired power plants, coal mines and related infrastructure (i.e. the provision of products or services to thermal coal-based projects or business models) even if in the pre-construction phase - affects, in the reporting year, about 107 million euro of investments: the assets linked to this amount are expected to be disinvested in the medium-term. Additionally, it can be highlighted that the abovementioned policy excludes companies in various sectors that negatively impact climate change and not only firms operating in the thermal coal and unconventional oil & gas activities sectors, ensuring a comprehensive approach to mitigate environmental risks. This strategy aligns

with ISPA long-term goal of achieving net-zero greenhouse gas emissions by 2050, as part of ISPA's membership in the Net Zero Asset Owner Alliance. In addition, on the "Direct Investments" of segregated funds and own funds, intermediate targets have been set to reduce "Carbon Intensity EVIC" by 50% by 2029, to be reported in 2030. By focusing on sustainable investments, we aim to ensure the financial health and resilience of our portfolio, supporting global efforts to mitigate climate change.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

1

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

107000000

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

1

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

1644940

(3.1.1.25) Explanation of financial effect figure

The financial effect figure reflects the potential loss from investments in the Oil&Gas and Coal sectors under a NGFS scenario of "Delayed transition" extending to 2100. This estimate was derived from a climate stress test, which assessed the loss in market value of investments in this scenario. In fact, for the implementation of this scenario, the Climate Value-at-Risk model provided by a specialised info-provider was used. This model quantifies, in percentage terms, the potential impact of different climate scenarios on the market value of a security. For the analyses, it was decided to use the information available from the model at single asset level ("instrument") rather than at issuer level ("issuer"): this allowed to consider the specific characteristics of each portfolio element, such as, for example, the sector and the risk mitigation strategies adopted by the company. The Climate Value-at-Risk estimates for each asset were subsequently aggregated by jointly considering information on physical risk, policy risk and technological opportunities ("Aggregated CVaR"). The analysis was conducted for the Insurance Group's corporate investment portfolio also considering multiple climate scenarios (Delayed Transition, Current Policies, Net Zero 2050) over multiple time horizons (1, 2, 3, 5, 10, 15, 20, 30 and 70 years). The amount of portfolio exposed to the Oil&Gas and Coal sectors in a Delayed Transition scenario projected to 2100 is about €553million.

Applying the Climate Value-at-Risk model to these sectors, a stress of about -41% was obtained, i.e. a loss of about €224 million (representing less than 1% of ISPA investment portfolio). By applying an average insurance management investment fee, the estimated loss for Intesa Sanpaolo Assicurazioni, in a "Delayed transition" climate scenario, would be around €1.6 million. In the short term the adopted policy - that aims to exclude companies deriving at least 15% of their revenues from mining/electricity generation activities related to thermal coal and at least 10% of their revenues from unconventional Oil&Gas extraction activities and companies engaged in new thermal coal projects, including thermal coal-fired power plants, coal mines and related infrastructure (i.e. the provision of products or services to thermal coal-based projects or business models) that are in the pre-construction phase - affects, in the reporting year, about €107 million of investments.

(3.1.1.26) Primary response to risk

☑ Policies and plans

☑ More ambitious environmental commitments and policies

(3.1.1.27) Cost of response to risk

397200

(3.1.1.28) Explanation of cost calculation

Cost is related to the main actors involved in sustainable issues/projects in particular those proposing the tools and methodologies for the monitoring process and managing of sustainability risk indicators. The cost includes 6 FTEs working on average in the divisions involved in risks activities (1 FTE has an average annual cost of 66,200 euro). Among others Risk Management performs the measurement of the exposure to sustainability risk of the products managed coordinating with the other business functions. The RM Function monitors the impacts of sustainability risks on financial products and compliance with the Policy for integration of ESG sustainability factors into investment process overseeing the correct application of the safeguards governed by external/internal regulations. It also oversees compliance with decision-making process and Operating Limits aimed at containing risks of managed portfolios related to ESG/SRI issues.

(3.1.1.29) Description of response

Intesa Sanpaolo Assicurazioni (ISPA) Group has adopted specific guidelines for the consideration of risks and impacts on sustainability factors within the sphere of management of its investment process. The Policy defines the application of exclusions or restrictions with respect to the Investment Universe of the individual assets managed in relation to issuers operating in sectors deemed to be not "socially responsible", such as: companies that derive at least 15% of their revenues from mining or electricity production activities related to thermal coal; companies that derive at least 10% of their revenues from unconventional Oil&Gas extraction activities; companies involved in new thermal coal projects, including thermal coal-fired power plants, coal mines and related infrastructure (i.e. the provision of products or services to thermal coal-based projects or business models) that are in the pre-construction phase. The thresholds described above will be periodically reviewed to become more severe in order to be aligned with the commitments that the Group signed. To further solidify ISPA commitment to mitigate climate change, ISPA Group in 2021 joined the "Net Zero Asset Owner" Alliance. In addition, on the "Direct Investments" of segregated funds and own funds, intermediate targets have been set to reduce "Carbon Intensity EVIC" by 50% by 2029, to be reported in 2030. This limit is quarterly monitored in the context of RAF (Risk Appetite

Framework) as an early warning confirming the ambitions of the Group in the low-carbon transition. Intesa Sanpaolo Assicurazioni joined the Forum for Insurance Transition to Net Zero (FIT) launched by United Nations Environment Programme (UNEP) in April 2024.

Climate change

(3.1.1.1) Risk identifier

☑ Risk8

(3.1.1.3) Risk types and primary environmental risk driver

☑ Acute physical

☑ Heavy precipitation (rain, hail, snow/ice)

(3.1.1.4) Value chain stage where the risk occurs

☑ Insurance underwriting portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Insurance risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

The Non-Life company of Intesa Sanpaolo Assicurazioni Group faces higher physical climate risks compared to Life business companies, which are more exposed to reputational and transition risks. Intesa Sanpaolo Protezione S.p.A. (hereinafter "ISPP") has assessed the impact of severe climate events, like hail and floods, that have affected part of Italy in the recent years and the potential increase in their likelihood in the future. ISPP operates nationwide, offering products to protect people through P&C and Health policies. The Solvency II Lines of Business (LoBs) most exposed to climate change effects include: - LoB 5 "Other motor insurance" - LoB 7 "Fire and Other Damage to Property Insurance". Based on the product catalogue of the insurance company and the scope of the climate change risk, the above-

mentioned LoBs are the ones associated to the highest amount of gross written premiums in the reporting year. Considering the various risk categories analysed, it's hypothesised that acute physical risks could impact insurance liabilities in the short, medium, and long term. By analysing key exposures in CRESTA (Catastrophe Risk Evaluation and Standardizing Target Accumulations) zones, provincial level, and performing a climate stress test, it was confirmed that hail peril is the most significant and potentially impactful risk. In particular, approximately 2/3 of the increase in the total incurred claims would be attributed to hail.

(3.1.1.10) % of portfolio value vulnerable to this risk

☑ 1-10%

(3.1.1.11) Primary financial effect of the risk

☑ Increased insurance claims liability

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ More likely than not

(3.1.1.14) Magnitude

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The anticipated effect of the climate risks has been estimated to have a significant magnitude when considering only the Non-Life business. Nonetheless, the Group deemed it necessary to conduct estimates to evaluate and mitigate the potential negative impacts of climate change. For the hail peril, the analysis based on NGFS Delayed Transition climate scenario (projected to 2100) predicted an increase of the claims for each Line of Business (LoB) which was obtained applying stress frequency factors, estimated using best-in-class market models. The analyses described above have made it possible to quantify the potential increase in incurred claims arising using a NGFS Delayed Transition climate scenario (projected to 2100). In order to verify the impact on the solvency/financial resilience of the non-life insurance companies and, at a later stage, on the entire Insurance Group, the model took into account reinsurance policies in force during the reporting year and the potential increase in reinsurance cost due to the applied scenario. A limited impact observed on solvency position is significantly mitigated by reinsurance.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

1

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

43000000

(3.1.1.25) Explanation of financial effect figure

The anticipated effect of the climate risks has been estimated to have a significant magnitude when considering only the Non-Life business. Nonetheless, the Group deemed it necessary to conduct estimates to evaluate and mitigate the potential negative impacts of climate change. For the hail peril, the analysis based on NGFS Delayed Transition climate scenario (projected to 2100) predicted an increase of the claims for each Line of Business (LoB) which was obtained applying stress frequency factors, estimated using best-in-class market models. The analyses described above have made it possible to quantify the potential increase in incurred claims arising using a NGFS Delayed Transition climate scenario (projected to 2100). In order to verify the impact on the solvency/financial resilience of the non-life insurance companies and, at a later stage, on the entire Insurance Group, the model took into account reinsurance policies in force during the reporting year and the potential increase in reinsurance cost due to the applied scenario. A limited impact observed on solvency position is significantly mitigated by reinsurance.

(3.1.1.26) Primary response to risk

☑ Policies and plans

☑ Use risk transfer instruments

(3.1.1.27) Cost of response to risk

264800

(3.1.1.28) Explanation of cost calculation

Annual cost is related to the main actors directly involved in sustainable issues and projects, in particular those functions working in the application of sustainability policies. The cost includes the 4 FTEs working on average in the divisions involved in the activities related to the opportunity (every FTE in ISP has an average

annual cost of 66,200 euro). Specifically in relation to risks among the other functions, Sustainability oversees the dissemination and adoption of sustainability principles in the underwriting business promoting the integration of environmental social and governance factors in the business process and monitors market practices proposing interventions to introduce innovations on corporate methodologies and processes to the Senior Management. In addition, Risk Management and Commercial functions contribute to the work on Risk assessment and Products development respectively.

(3.1.1.29) Description of response

The risks described above are managed by adopting a risk monitoring and underwriting strategy optimisation process with the use of actuarial models that are periodically updated to estimate potential damages from extreme weather events and assure their adequate pricing. These risk management measures, combined with the fact that impacts are expected to emerge gradually, provide time to react by rebalancing pricing and portfolios. Along with the techniques described above, the Insurance Group in order to reduce its exposure and magnitude to climate risks has always given a primary role to the reinsurers, with which the Insurance Group periodically underwrites contracts. The Italian government introduced, in the context of Budget Law 2024, a requirement for Italian companies to insure against catastrophic events by December 31, 2024. This law has the scope to reduce the insurance protection gap that Europe, in particular Italy, is facing. This legislation helps bridge this gap by spreading the financial burden of disasters, promoting proactive risk management and minimising the strain on public resources.

Climate change

(3.1.1.1) Risk identifier

☑ Risk9

(3.1.1.3) Risk types and primary environmental risk driver

☑ Acute physical

☑ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

☑ Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Credit risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

In ISP, physical risk for large corporate clients operating in the power generation sector in the most representative geographical areas of ISP's credit portfolio (e.g.- Italy, US, UK and Germany) is assessed considering the following physical risks hazards: Flood, Wildfire, Wind Gust, Landslide, Drought, Cold wave, Heatwave, Sea Level Rise. For each client in the scope of assessment, the balance-sheet and Profit & Loss items for the different time horizons considered are simulated prospectively by including the impacts deriving from the physical risk hazards in a disorderly scenario. The credit quality of each company is assessed, and synthetic indicators of riskiness are identified as a function of its worsening in rating and creditworthiness. Transition risk impacts are different according to the business profile of the individual client. Clients whose business depends on emissions-intensive fossil fuel extraction (extraction and processing of oil or natural gas) are subject to intense demand stress already in the short to medium-term (until 2031), due to both shifts in consumer preferences and regulatory pressure impacting the end-use cost of the product. Clients operating in the natural gas value chain (distribution, marketing) are exposed to less immediate transition risk (mainly in the medium- and long-term).

(3.1.1.10) % of portfolio value vulnerable to this risk

☑ Less than 1%

(3.1.1.11) Primary financial effect of the risk

☑ Increased credit risk

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ Likely

(3.1.1.14) Magnitude

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Intesa Sanpaolo has an exposure to the power generation sector at high risk and very high physical risk, equal to 17,352,935 euro at 31/12/2025. The maximum amount represents the exposure of Intesa Sanpaolo (gross carrying amount) to the power generation sector exposed to high and very high physical risk in the long term at 31/12/2025. On the other hand, the minimum loss is estimated at 1 euro in case the disorderly scenario considered as the basis of the estimates of the financial effect does not occur.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

1

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

17352935

(3.1.1.25) Explanation of financial effect figure

The maximum amount represents the exposure of Intesa Sanpaolo (gross carrying amount) to the power generation sector exposed to high and very high physical risk in the long term at 31/12/2025. The change in this value compared with CDP 2025 is also driven by methodological change, especially a revision of the sectoral classification. On the other hand, the minimum loss is estimated at 1 euro in case the disorderly scenario considered as the basis of the estimates of the financial effect does not occur.

(3.1.1.26) Primary response to risk

☑ Policies and plans

☑ Increase insurance coverage

(3.1.1.27) Cost of response to risk

794400

(3.1.1.28) Explanation of cost calculation

The cost calculation includes: -4 FTEs of the Chief Risk Officer Area -4 FTEs of the Chief Sustainability Officer Area -4 FTEs in the business units. For a total of 12 FTEs with an estimated average gross cost of 66,200 euro yearly each for a total cost of response equal to 794,400 euro.

(3.1.1.29) Description of response

ISP responded to this risk by carrying out the following activities: - In order to transfer the physical risk linked to the activities of Power generation corporate clients Intesa Sanpaolo plans to develop new insurance policies and increase the coverage of existing policies e,g. fire insurance policy; - Monitoring of sector exposures within the risk management processes.

Climate change

(3.1.1.1) Risk identifier

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

☑ Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

☑ Direct operations

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

☑ Operational risk

(3.1.1.6) Country/area where the risk occurs

☑ Italy

(3.1.1.9) Organization-specific description of risk

ISP anticipates that carbon-pricing regulations may emerge over the medium- to long -term timeframe, and such regulations may result in a financial impact on the company's operations, including an increase in operating costs as well as potential capital expenditures to reduce emissions. According to ISP's assessment, such new regulation is more likely to emerge first in Europe where ISP mainly operates. In detail ISP anticipates that operating costs could increase due to taxation on ISP's direct emissions. To mitigate this risk ISP carries out actions to reduce direct emissions as described in its Own Emissions Plan (Renewing thermal power plants with new energy efficient equipment - Reducing gas consumption- etc). ISP estimates that if a carbon pricing of 71.50 euro per tonne CO2 (price of European Emission Allowances Futures Dec 2027 recorded on the 15th of June 2026) is applied on the 2025 Intesa Sanpaolo's Scope 1 emissions (43,592t), this would lead to an additional cost of around 3,117,000 euro.

(3.1.1.11) Primary financial effect of the risk

☑ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

☑ Likely

(3.1.1.14) Magnitude

☑ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

ISP anticipates that carbon-pricing regulations may emerge over the medium- to long -term timeframe, and such regulations may result in a financial impact on the company's operations, including an increase in operating costs as well as potential capital expenditures to reduce emissions. According to ISP's assessment, such new regulation is more likely to emerge first in Europe where ISP mainly operates. In detail ISP anticipates that operating costs could increase due to taxation on ISP's direct emissions. ISP estimates that if a carbon pricing of 71.50 euro per tonne CO2 (price of European Emission Allowances Futures Dec 2027 recorded on the 15th of June 2026) is applied on the 2025 Intesa Sanpaolo's Scope 1 emissions (43,592t), this would lead to an additional cost of around 3,117,000 euro. The possible introduction of a new carbon tax could have an impact on the income statement of Intesa Sanpaolo. This calculation is precautionary, as it does not consider the planned reduction in Scope 1 emissions defined in ISP's Own Emissions Plan. On the other hand, the minimum loss is estimated at 1 euro in case the anticipated regulation on carbon pricing does not occur.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

1

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

3117000

(3.1.1.25) Explanation of financial effect figure

The possible introduction of a new carbon tax could have an impact on the income statement of Intesa Sanpaolo. Intesa Sanpaolo estimates that if a carbon pricing of 71.50 euro per tonne CO2 (price of European Emission Allowances Futures Dec 2027 recorded on the 15th of June 2026) is applied on the 2025 Intesa Sanpaolo's Scope 1 emissions (43,592t), this would lead to an additional cost of around 3,117,000 euro. This calculation is precautionary, as it does not consider the planned reduction in Scope1 emissions defined in ISP's Own Emissions Plan. On the other hand, the minimum loss is estimated at 1 euro in case the anticipated regulation on carbon pricing does not occur.

(3.1.1.26) Primary response to risk

☑Compliance, monitoring and targets

☑ Other compliance, monitoring or target, please specify :analysis of current European legislation; actions to reduce direct emissions

(3.1.1.27) Cost of response to risk

6332400

(3.1.1.28) Explanation of cost calculation

The estimated cost of management takes into account: interventions on plants (about 1,500,000 euro), actions of energy efficiency (about 4,700,000 euro), 2 FTEs in the Real Estate Department and Safety Department with an estimated gross annual cost of 66,200 euro each (132,400 euro), for a total of 6,332,400 euro.

(3.1.1.29) Description of response

To anticipate new introduction of carbon pricing ISP carries out a careful analysis of current European legislation and possible changes that may impact and modify the risk for the Bank. ISP also carries out actions to reduce direct emissions as described in the ISP environmental plan "Own Emissions Plan" prepared in 2021 with targets set for 2030. In the Plan, the Intesa Sanpaolo Group sets CO2 emission reduction targets, linked to its activities, taking 2019 as the reference year. The 2030 targets are supported by targeted actions. The targets include emissions reduction related to energy consumption (direct and indirect), which is tied to measures taken on electricity, natural gas for independent heating and fleet. On 27 January 2025, SBTi validated Intesa Sanpaolo's Scope 1 + Scope 2 target, determining that its ambition is in line with a 1.5°C pathway.

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

☑ Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

5242000000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

☑ 1-10%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

23431000000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

☑ 1-10%

(3.1.2.7) Explanation of financial figures

The financial figures presented refer to the amounts disclosed as required by Regulation (EU) 2021/637. With regards to transition risk exposure, the information provided relates to the non-financial corporations - clients of Intesa Sanpaolo – which are "excluded from EU Paris-aligned Benchmarks" (as per EU Regulation). Please refer to Pillar 3 – as at 31/12/2025, table 1, p.321 - 324. As for physical risk exposure, this relates to non-financial companies, on loans collateralised by immovable property and on repossessed real estate collateral, exposed to chronic and acute climate-related risks, in those sectors and geographical areas subject to climate change acute and chronic events. Please refer to Pillar 3 – as at 31/12/2025, table 5, p.330 and 331.

Forests

(3.1.2.1) Financial metric

☑ Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

5012944764

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

☑ 1-10%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

☑ Less than 1%

(3.1.2.7) Explanation of financial figures

The financial figures presented in relation to transition risk refer to the material exposure of Intesa Sanpaolo to counterparties dependent on ecosystem services or impacting biodiversity exposed to high and very high risk in the long term at 31/12/2025. In particular, it is the outcome of a sensitivity analysis estimating the impact of the introduction of a tax on land consumption on counterparties' financial statements. For a more prudential assessment, companies vulnerable to Crop and Timber Provisioning issues are also considered, in addition to those with NACE A1, A2, A3.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

☑ Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

☑ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

The materiality assessment (performed for the Sustainability Statement) did not identify any material opportunities, as none were found to target or significantly advance the management and reduction of elements directly linked to biodiversity loss by customer counterparties. Similarly, no initiatives were found to be material for own operations, given the specific nature of the Group's operations.

Water

(3.6.1) Environmental opportunities identified

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

☑ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

The materiality assessment (performed for the Sustainability Statement) found that the "Water" topic was not material at Group level.

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

☑ Markets
☑ Increased diversification of financial assets [e.g., green bonds and infrastructure]

(3.6.1.4) Value chain stage where the opportunity occurs

☑ Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

☑ Italy

(3.6.1.8) Organization specific description

The issuance of Green and Social debt securities in various format and currencies (secured, unsecured, subordinated, etc.) to fund new and existing loans and businesses with environmental benefits, in alignment with ICMA (Green Bond Principles 2021,Social Bond Principles 2021,Sustainability Bond Guidelines 2021) and with the intention of seeking alignment with the EU Taxonomy regulation on sustainable activities and the Green Bond Standards is part of ISP broader commitment to sustainability. Green funding has become increasingly important in the overall Group strategy. The amount of ISP Green Bonds outstanding as of the 31.12.2025 is approx. €8.7bn. The proceeds of any Bond issued under the Framework have been allocated exclusively to Eligible Loans as defined in the list of Eligible Green Categories, aligned to the ICMA Green Bond Principles 2021 as detailed in ISP Green, Social and Sustainability Bond Framework published in 06.2022. ISP defines an overall Eligible Loan Portfolio, which includes a Green sub-portfolio. The proceeds from the Bonds issued under the Framework are managed on a portfolio basis. Eligible Loans are selected in accordance with ISP's Eligibility Criteria and Process for project evaluation and selection. ISP will maintain an aggregate amount of loans in the portfolio that matches or exceeds the balance of net proceeds of all outstanding bonds issued under the Framework. The proceeds will be dedicated to eligible loans according to the framework.

(3.6.1.9) Primary financial effect of the opportunity

☑ Increased diversification of financial assets

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

☑ Short-term

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

☑ Medium-high

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

Since 2017 Intesa Sanpaolo has issued more than €10bn in Green Bonds (€8.67bn outstanding as of 31.12.2025). Overall, the Green Bond Ratio, i.e. the percentage of outstanding green bonds at the end of the year out of the total amount of outstanding Senior Preferred, Senior non-preferred and Covered Bonds intended for institutional investors (five-year moving average), is equal to about 18.4%. The proceeds from Green Bonds issuance contribute to the amount made available to customers for the green and ecological transition (~€89.4bn disbursed in 2021-2025). Intesa Sanpaolo published, in 03/26, the Green and Social Bond Report 2025 on the use of Green Bond proceeds and the associated environmental benefits that includes the independent auditor's report on the "Intesa Sanpaolo Green Portfolio-Allocation Report".

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

To contribute to its commitment to providing €88bn of which €76bn of lending in order to support the green and circular economy and the green transition, Intesa Sanpaolo issued Green Bonds during the 2022-2025 Business Plan period and will continue in the coming years. Issues under the Framework were part of a €42bn funding plan included in the 2022-2025 Business Plan. As a confirmation of ISP's commitment in the coming years, also reflected in new 2026-2029 Business Plan target to support clients in their sustainable transition by disbursing ~€87bn in new MLT lending for the sustainable transition over the Plan horizon (as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities), in June 2026 ISP issued a Senior Non-Preferred Green Bond of 1.25 billion euro aimed at financing/refinancing the green categories described in the Green, Social and Sustainability Bond Framework (June 2022).

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

0

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

1250000000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

21000000000

(3.6.1.23) Explanation of financial effect figures

The effective financial impact figures of €1.25bn represent the eligible Green bonds planned issuance in 2025 (actually issued in June 2026), whose proceeds contribute to finance the amount made available to customers for the green and ecological transition (overall €88bn of which around €21.1 disbursed in 2025 for a total of ~€89.4bn disbursed since 2021). The issuance of Green Bonds will continue in the coming years. The maximum anticipated financial effect figure in the short-term corresponds to ~€21 billion, which represents the total volume of eligible loans currently included in the Group's Green Loan Portfolio as reported in the Green and Social Bond Report 2025 (p.6). This amount represents the potential amount that could be financed through green bond issuances if all eligible loans were used for this purpose.

(3.6.1.24) Cost to realize opportunity

331000

(3.6.1.25) Explanation of cost calculation

The total cost represents the FTEs working for the Treasury department of Intesa Sanpaolo which is responsible for the issuances of Green and Social Bonds, the development and update of the Green, Social and Sustainability Bond Framework and the publication of the Green and Social Bond Report (5 FTEs per 66,200 euro).

(3.6.1.26) Strategy to realize opportunity

In line with the 2022-25 Business Plan (BP) launched in early 2022 that foresees €42bn funding plan over the BP horizon, including green and social bonds, this target offers the opportunity to provide funds to increase finance for clients' transition. Intesa Sanpaolo's commitment to support the ESG transition is, in fact, also achieved through the issuance of bonds dedicated to the financing of social and environmental projects. For these issues, the Bank has developed a specific Framework compliant with the ICMA Green Bond Principles 2021, the ICMA Social Bond Principles 2021, the ICMA Sustainability Bond Guidelines 2021. The issuance of Green and Social debt securities in various formats and currencies (secured, unsecured, subordinated, CP) to fund new and existing loans and businesses with environmental and/or social benefits is part of Intesa Sanpaolo broader commitment to sustainability. The availability and/or provision of eligible financing is also underpinning green and social bond issuances, as confirmed in 2026 by the continued use of this instrument to support the Group's sustainability goals. Intesa Sanpaolo defines an overall Eligible Loan Portfolio, which includes a Green sub-portfolio. The proceeds from the Bonds issued under this Framework are managed on a portfolio basis. Eligible Loans are selected in accordance with ISP's Eligibility Criteria and Process for project evaluation and selection. Intesa Sanpaolo will maintain an aggregate amount of loans in the portfolio that matches or exceeds the balance of net proceeds of all outstanding Intesa Sanpaolo bonds issued under the Framework. The proceeds of any Intesa Sanpaolo bond under the Framework are dedicated to loans directly from Intesa Sanpaolo or from any one of Intesa Sanpaolo's subsidiaries dedicated to circular and green financing, which are funded via intercompany loans.

Climate change

(3.6.1.1) Opportunity identifier

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

☑ Products and services

☑ Increased sales of existing products and services

(3.6.1.4) Value chain stage where the opportunity occurs

☑ Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

☑ Italy

(3.6.1.8) Organization specific description

ISP is very active in supporting individuals and businesses committed to reducing their environmental footprints also by engaging in the path of transition, through the promotion of green products and services. As widely demonstrated by international studies and research, climate change can also be regarded as a business opportunity and an economic development lever. Intesa Sanpaolo has the opportunity to expand the market in the field of renewable energy, energy efficiency. This could lead to greater demand for environmental loans with positive financial impacts in terms of revenues. The development of green products and services is considered by ISP as an opportunity that has a potential for further expansion in the coming years. In 2022, following the strong focus on climate included in the 2022-2025 Business Plan, Intesa Sanpaolo committed to providing €88bn of which €76bn of new lending in order to support the green and circular economy and the green transition (including Mission 2 NRRP) and €12bn dedicated to individuals, mostly in relation to green lending to individuals. In February 2026 the new 2026-2029 Business Plan has been published confirming ISP commitment in supporting clients in the sustainable transition with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities.

(3.6.1.9) Primary financial effect of the opportunity

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

☑ Short-term

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

☑ High

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

In the period 2021-2025, new lending in support of the green economy, circular economy and ecological transition amounted to ~€89.4bn, while new green lending to individuals amounted to ~€15.2bn. Specifically in 2025, around €21.1bn also in relation to new lending to support the green economy, circular economy and ecological transition and ~€6.3bn of Green Mortgages were disbursed.

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The anticipated effect on the opportunity is based on the results achieved and loans disbursed over the Business Plan period. In the period 2021-2025, new lending in support of the green economy, circular economy and ecological transition amounted to ~€89.4bn (€76bn targeted over the Business Plan horizon), while new green lending to individuals amounted to ~€15.2bn (€12bn targeted over the Business Plan horizon). Therefore, the estimated effect of the opportunity during the Business Plan period amounts to around €89.4bn for lending disbursed in support of the green economy, circular economy and ecological transition and to ~€15.2bn in terms of green lending disbursed to individuals, referring to the results achieved under the Business Plan 2022-2025, which exceeded the related targets. In February 2026 the new 2026-2029 Business Plan has been published confirming ISP commitment in supporting clients in the sustainable transition with the goal of disbursing

~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

27400000000

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

1

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

65000000000

(3.6.1.23) Explanation of financial effect figures

The financial effect figure (€27.4bn) in the reporting year is linked to disbursement already made available to customers in 2025: around €21.1bn related to lending to support the green economy, circular economy and ecological transition (including Mission 2 NRRP) and ~€6.3bn of Green Mortgages. The anticipated financial effect figure of €65bn is related to the potential disbursement, over three years, that will be made in relation to the 2026-2029 Business Plan commitment in supporting clients in the sustainable transition with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities.

(3.6.1.24) Cost to realize opportunity

595800

(3.6.1.25) Explanation of cost calculation

Annual costs related to the development of green products and services are integrated into the ISP budgets. ISP estimates a cost of 9 FTEs (66,200 euro each): 3 FTEs in the dedicated Desk providing support to businesses that invest in renewable energy and energy efficiency, providing dedicated medium long term financial

solutions and specialist advisory services, 3 FTEs in the Corporate banking division developing the offer to Corporate and Large Corporate clients, 3 FTEs in the Chief Sustainability Officer (CSO) Area supporting the business functions of the Group in this respect.

(3.6.1.26) Strategy to realize opportunity

Intesa Sanpaolo's strategy is focused on actively supporting its clients in the transition towards a low carbon economy, promoting sustainability across all dimensions, supporting generation and demand of renewable energy, promoting energy efficiency and the distinctive circular economy model, and encouraging clients to reduce their environmental footprint through the offer of climate-related loan products and services also within innovative financial solutions. In the period 2021-2025, lending in support of the green economy, circular economy and ecological transition amounted to ~€21.1bn, while green lending to individuals amounted to ~€15.2bn. The Intesa Sanpaolo 2022-2025 Business Plan confirmed the strong focus on climate with the commitment to providing €88bn of which €76bn of new lending in order to support the green and circular economy and the green transition (including Mission 2 NRRP) and €12bn dedicated to individuals, mostly in relation to green mortgage lending to individuals. IMI Corporate & Investment Banking supports companies throughout the entire process of developing and implementing sustainable initiatives, of realising sustainable strategic plans, investing in the transition. The ESG Advisory Team created in 2023 assists the IMI Corporate & Investment Banking Corporate, Financial Institutions, Sovereign and Supranational Agencies clients with sustainable finance customised solutions. Among the main products offered to SME customers, there is the sustainability-linked "S-Loan" to support small- and medium-sized enterprises that aim to improve their sustainability profile and to assist them on a path of structural change, associating their economic and financial decisions with their environmental and social impacts, through precise commitments undertaken with the Bank using specific ESG indicators (KPIs) subject to annual monitoring. In February 2026 the new 2026-2029 Business Plan has been published confirming ISP's commitment in supporting clients in the sustainable transition with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities.

Climate change

(3.6.1.1) Opportunity identifier

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

☑ Products and services

☑ Development of new products or services through R&D and innovation

(3.6.1.4) Value chain stage where the opportunity occurs

☑ Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

☑ Italy

(3.6.1.8) Organization specific description

ISP is very active in supporting individuals and businesses committed to reducing their environmental footprints also through Circular Economy (CE). ISP has confirmed its commitment to CE also drawing on the support of the Ellen MacArthur Foundation. The collaboration with the Foundation continues since 2015 and has recently been renewed also for the 2026-2029 period. With a view to supporting businesses active in the green and circular transition process, ISP has renewed its credit offer dedicated to CE allocating an additional €8bn credit facility over the 2022-2025 Business Plan period available to customers of the Banca dei Territori, IMI Corporate & Investment Banking and International Banks Division, aimed at Italian and foreign companies that adopt circular business models in innovative ways. Within the credit process, ISP Innovation Center, based on five Circular Economy eligibility criteria, defined together with the Ellen MacArthur Foundation, makes a technical assessment regarding the level of circularity of the initiatives proposed by companies. In addition to the Circular framework, a tranche of the credit facility is dedicated to the Green framework, on the basis of five additional eligibility criteria aligned with the Green, Social & Sustainability Bond Framework of the Bank, to support companies investing in renewable energy, energy efficiency, clean transportation, green buildings and sustainable management of natural resources, soil and biodiversity.

(3.6.1.9) Primary financial effect of the opportunity

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

☑ Short-term

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

☑ High

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

Intesa Sanpaolo in the Business Plan 2022-2025 announced an €8bn credit facility dedicated to circular economy (2022-2025); the amount was calculated based on the previous experience of the 2018-2021 Business Plan where amounts granted under the successful circular economy credit facility totalled €7.7 bn. During 2025, through the specialised support of the Intesa Sanpaolo Innovation Center, 300 green and circular projects amounting to more than €19.5bn were validated. Of these, €9.4bn were then granted by the Group in 188 transactions (of which about €5.2bn related to Green criteria) and around €3.3bn were disbursed (of which about €1.6bn related to Green criteria). Overall, since 2022 the Group's disbursements to the Circular economy amounted to ~€15.9bn (of which about €10.7bn related to green criteria). As concerns 2025, Circular Economy dedicated credit facility Projects disbursed by sector were as follows: Industrial & Manufacturing 12%, Energy, Water & Utilities 10%, Construction and Furniture 57%, Agriculture, Food & Beverage 17%, Mobility, Logistics & Infrastructure 1%, other sectors 4%.

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The anticipated effect on the opportunity is based on the results achieved and loans disbursed over the Business Plan period. Overall, since 2022 the Group's disbursements to the Circular economy amounted to ~€15.9bn (of which about €10.7bn related to green criteria).Thanks to the specialist support of the Intesa Sanpaolo Innovation Center, in 2025 300 green and circular projects amounting to more than €19.5bn were validated. Of these, around €9.4bn (of which about €5.2bn related to green criteria) were then granted by the Group in 188 transactions and disbursed around €3.3bn (of which about €1.6bn related to green criteria), taking into account previously granted amounts. Overall, since 2022 around 1,400 green and circular projects have been assessed and validated, for a value of more than €53.4bn. Of these, the Group granted more than €29.7bn (of which about €17bn related to green criteria) in 830 transactions, with around €15.9bn disbursed taking into account projects previously agreed (of which about €10.7bn related to green criteria).

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

3300000000

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

1

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

9900000000

(3.6.1.23) Explanation of financial effect figures

During 2025, ~€3.3bn was disbursed under the circular economy credit facility (~€15.9bn since 2022). With regard to the short-term effect, the estimated figure of approximately €9.9bn has been calculated based on the loans disbursed in 2025. A prudent approach has been adopted because the new Circular Economy criteria will become effective from FY2026 and may affect future disbursement volumes. Nonetheless, in February 2026 the new 2026-2029 Business Plan has been published confirming ISP commitment in supporting clients in the sustainable transition with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities. This includes Circular Economy as one of the strategic levers, based on the new Circular Economy criteria available starting from FY 2026.

(3.6.1.24) Cost to realize opportunity

198600

(3.6.1.25) Explanation of cost calculation

Annual costs related to the management of the credit facility and the related assessments are estimated in 3 FTEs (average of 66,200 euro each, total 198,600 euro) working in a dedicated team named CE Desk. Such FTEs are employed to assess deals that are potentially eligible to access the credit facility, as well as to monitor and coordinate its overall functioning.

(3.6.1.26) Strategy to realize opportunity

ISP has confirmed its commitment to the Circular Economy by fostering the dissemination of the circular economy paradigm, also drawing on the support of the Ellen MacArthur Foundation, the main promoter of this global transition. The collaboration with the Foundation, of which ISP is a Strategic Partner, continues since 2015 through a renewed agreement also for the 2026-29 period. With a view to concretely support businesses active in the green and circular transition process, ISP renewed its credit offer dedicated to the Circular Economy and green projects (initially inaugurated with the 2018-21 Business Plan), allocating an additional €8bn over the 2022-25 Business Plan period. The dedicated credit facility was made available to customers of the Banca dei Territori, IMI Corporate & Investment Banking and International Banks Division and it is aimed at Italian and foreign companies that adopt circular business models in innovative ways, granting them the best conditions to access credit. Within the credit process, Intesa Sanpaolo Innovation Center, the company of ISP dedicated to the frontier of innovation, based on five

specific Circular Economy eligibility criteria defined together with the Ellen MacArthur Foundation, makes a technical assessment regarding the level of circularity of the initiatives proposed by companies. In addition to the Circular framework, a tranche of the plafond was dedicated to the Green framework, on the basis of five additional eligibility criteria aligned with the Green, Social & Sustainability Bond Framework of the Bank, to support companies investing in renewable energy, energy efficiency, clean transportation, green buildings and sustainable management of natural resources, soil and biodiversity. The Group's commitment to the transition to a Circular Economy is further reinforced by the continuation of the collaboration between ISP, ISP Innovation Center, Fondazione Cariplo and Cariplo Factory through the Circular Economy Lab, extended into the 2026-29 four-year period to support the transformation of the Italian economic system. In February 2026, ISP published its 2026–2029 Business Plan, reaffirming its commitment to supporting clients in the sustainable transition with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities.

Climate change

(3.6.1.1) Opportunity identifier

☑ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

☑ Products and services

☑ Increased sales of existing products and services

(3.6.1.4) Value chain stage where the opportunity occurs

☑ Investing (Asset manager) portfolio

(3.6.1.5) Country/area where the opportunity occurs

☑ Italy

(3.6.1.8) Organization specific description

In line with its active participation and public commitments within the scope of the most important European initiatives on ESG and climate, the Intesa Sanpaolo Group intends in the 2022-2025 Business Plan to become leader in Wealth Management, Protection & Advisory, with a strong commitment to ESG. In particular, it stated among its objectives an expansion of its sustainability-conscious range of products in asset management and life insurance, the further development of Eurizon's proprietary ESG scoring with the extension of its model to government issuers and the development by Fideuram of advisory services with an ESG focus. The strategic commitment in tackling climate change is also embodied in the strengthening of the asset management offering, in all the asset classes that include a focus on environmental or social issues, with a planned growth of assets under management classified under art. 8 and 9 of the SFDR 2088/2019 from 46% to 60% in 2025, achieving this objective in 2025 reaching 75.4% of total AuM.

(3.6.1.9) Primary financial effect of the opportunity

☑ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

☑ Short-term

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

☑ Medium-high

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

In line with the materiality analysis conducted in 2025, Eurizon recognises the importance of adopting decision-making processes that are conducive to effectively addressing sustainability issues. Among issues identified as relevant by Eurizon in continuity with 2024, there is the integration of sustainability factors into

investments, finalised to the improvement of the risk-return profile of portfolios by integrating sustainability factors into the investment analysis, selection and management processes of all the products managed and marketed by the Company. At the end of 2025, the range included 392 eligible funds under Article 8 or 9 of the SFDR amounting to approximately 169.2 billion euro, or 75.4% (75.6% in 2024 and 73.3% in 2023) of assets under management in funds. In line with its commitment and the Intesa Sanpaolo Group's strategic objectives, 84 new funds eligible to be classified under Article 8 pursuant to the SFDR Regulation were launched during 2025. In particular, as of the end of 2025 the assets of the products pursuant to Article 8 amounted to approximately 166.8 billion euro and the assets of the products pursuant to Article 9 amounted to approximately 2.4 billion euro.

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The strategic commitment in tackling climate change is also embodied in the strengthening of the asset management offering, in all the asset classes that include a focus on environmental or social issues, with a planned growth of assets under management classified under art. 8 and 9 of the SFDR 2088/2019 from 46% to 60% in 2025, achieving this objective in 2025 reaching 75.4% of total AuM. At the end of 2025, Eurizon offered 392 eligible funds under Article 8 or 9 of the SFDR amounting to approximately 169.2 billion euro, or 75.4% (75.6% in 2024 and 73.3% in 2023) of assets under management in funds. In line with its commitment and the Intesa Sanpaolo Group's strategic objectives, 84 new products eligible to be classified under Article 8 pursuant to the SFDR Regulation were launched during 2025.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

169200000000

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

169200000000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

169200000000

(3.6.1.23) Explanation of financial effect figures

The perspective of financial relevance can influence Eurizon's financial performance and results and thus can increase the company's corporate value in the short, medium and long term, contributing to its development, performance and positioning. The financial impact is represented by the Eurizon stock of AuM, that, at the end of 2025, amounted to around 169.2 billion euro, equal to around 75.4 % of Eurizon's total AuM (vs a target of 60% in 2025 under the 2022-2025 Business Plan). The anticipated maximum financial effect figure has been confirmed equal to the current stock of AuM. The strategic relevance of ESG considerations has been further reaffirmed in the 2026–2029 Business Plan. Consistent with the Group's broader commitment to supporting clients in the sustainable transition and maintaining its decarbonisation objectives, the focus remains on the development, management and distribution of Article 8 SFDR products, with sustainability integration continuing to represent a core component of the investment offering. While closely monitoring the ongoing evolution of the SFDR framework and related market standards, the Company intends to maintain a prudent and flexible approach to product positioning, ensuring alignment with both regulatory expectations and investors' sustainability preferences.

(3.6.1.24) Cost to realize opportunity

1721200

(3.6.1.25) Explanation of cost calculation

Cost is related to the main actors involved in sustainable issues and projects, in particular the functions cooperating to develop products, services and sustainability policies. Among others, Responsible Investments&Stewardship team is responsible for developing and implementing SRI/ESG policies, ensuring the correct deployment of related operational processes, monitoring market practices proposing innovations to corporate methodologies/processes to Senior Mngmt. The Team is divided in - Corporate Governance unit: coordinates activities related to the management of shareholders meetings for the exercise of voting rights for shareholdings held by the assets managed by the Company; and carries out and monitors engagement activities with relevant issuers on corporate governance issues, coordinating environmental/social/ethical issues with the Sustainability unit. The Sustainability Unit: coordinates the strategy on Sustainability/Responsible Investment issues providing support to Senior Management in relation to the integration of ESG factors in the Company's Investment Process and in the design and implementation of new products and services; monitors and conducts engagement activities towards issuers with particular reference to environmental/social issues and supports the functioning of the ESG Committee. Long-Term Sustainable Strategies structure of the Investments Department, under the coordination of the Head of Investment Solutions, monitors corporate issuers, also using info-providers specialised in ESG/SRI issues, so to identify the lists referring: to issuers operating in sectors capable of causing significant adverse impacts on the environment and society; and/or with a high exposure to ESG risks ("critical issuers"); and/or that do not comply with good governance practices. With the support of Responsible Investments&Stewardship, it oversees the identification and prioritisation of principal adverse effects of investment choices on sustainability factors, using specialised info-providers. The results of the analyses carried out in coordination with the Risk Management Function, are presented to the Financial, Credit and Operational Risks Committee, responsible for monitoring and taking actions to mitigate the adverse effects of investment decisions. The cost, equal to around 1.6m, includes the 26 FTEs working - on average – on ESG opportunities in the various divisions (average annual cost of 1 FTE: 66,200 euro yearly).

(3.6.1.26) Strategy to realize opportunity

As a financial market participant and financial advisor, Eurizon Capital has a fiduciary commitment to its stakeholders, that requires to effectively deal with the issues relating to sustainability, with reference to returns on financial products and to issuers in which it invests in. Eurizon's mission underlines the importance of cooperating with the companies in which it invests, to promote sustainable growth and high standards of governance. In line with its Sustainability Policy and the Engagement Policy, the Company believes that issuers that take ESG criteria into account in the conduct of their business are more likely to generate sustainable profits and thus have a greater chance of increasing their value over time. Therefore, in addition to offering a range of products resulting from the selection and monitoring of financial instruments aimed at integrating sustainability risks into the investment process, Eurizon encourages its investee companies to promote behaviour that prioritises sustainability aspects and encourages them to adopt the best corporate governance practices.

Climate change

(3.6.1.1) Opportunity identifier

☑ Opp5

(3.6.1.3) Opportunity type and primary environmental opportunity driver

☑ Reputational capital

☑ Reputational benefits resulting in increased demand for products/services

(3.6.1.4) Value chain stage where the opportunity occurs

☑ Investing (Asset owner) portfolio

(3.6.1.5) Country/area where the opportunity occurs

☑ Italy

(3.6.1.8) Organization specific description

During 2025, the Intesa Sanpaolo Assicurazioni Group continued to develop and evolve the products and services offer for all its business lines to meet customer needs on sustainability issues. In line with its ongoing commitment to sustainability, also outlined within the corporate policies, the Insurance Group's goal is to continue the evolution of its offer, including new products and insurance coverages over the coming years, as well as the revision of product processes with an ESG perspective. Some of those are related to climate and environmental matters.

(3.6.1.9) Primary financial effect of the opportunity

☑ Increased portfolio value due to upward revaluation of assets

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

☑ Medium

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

In 2025, the Insurance Group continued along the roadmap of ESG objectives that are strategic and compliant with regulations, and the short- and medium-term action plans as defined in the 2022-25 Business Plan. The Life and Non-Life offer underwent several changes aimed at aligning it more closely with ESG principles. As part of the Life Insurance, the Insurance Group has long been committed to offering its clients a wide range of products developed by integrating ESG criteria and classified pursuant to Article 8 of EU Regulation 2019/2088 (SFDR). Considering the underlying assets of the products, a broad selection of investment options classified under Articles 8 and 9 of EU Regulation 2019/2088 (SFDR) is made available: as of December 2025, 81.2% of the investment options offered by the marketed products were classified as Article 8 and 9 SFDR. All new life products launched in 2025, except for "Opportunità Dublin Branch", whose classification depends on that of the single underlying thematic internal fund, were classified pursuant to Article 8 of the SFDR Regulation.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

87751000000

(3.6.1.23) Explanation of financial effect figures

The assets under management relating to investment options pursuant to Articles 8 and 9 of the SFDR, regarding Insurance-Based Investment Products (IBIPs) and Pension Fund products, amounted to 87.8 billion euro as of 31 December 2025 (equal to 46% of the total assets under management), showing an increase compared to 79.7 billion euro at the end of 2024.

(3.6.1.24) Cost to realize opportunity

397200

(3.6.1.25) Explanation of cost calculation

Annual cost is related to the main actors directly involved in sustainable issues and projects, in particular those functions that cooperate in the development of products, services, and sustainability policies. The cost includes the 6 FTEs working on average in the divisions involved in the activities related to the opportunity (every FTE at Intesa Sanpaolo has an average annual cost of 66,200 euro). Among the other functions, the Sustainability unit oversees the dissemination and adoption of investment sustainability principles, promotes the integration of environmental, social, and governance factors into the investment process, and monitors market practices, proposing interventions to introduce innovations in corporate methodologies and processes to Senior Management. The Investment Area is responsible for developing and implementing company policies on SRI and ESG related issues, and for ensuring the correct deployment of the related operational processes. Furthermore, it monitors corporate issuers, relying on specialised ESG and SRI info-providers to identify: issuers deemed not responsible; and/or those with high ESG risk exposure (critical issuers); and/or those not compliant with good governance practices. With the support of other business functions, it also oversees the identification and prioritisation of principal adverse effects of investment choices on sustainability factors, using specialised info-providers.

(3.6.1.26) Strategy to realize opportunity

Intesa Sanpaolo Assicurazioni S.p.A., as the Parent Company of the Intesa Sanpaolo Assicurazioni Group (hereinafter the Insurance Group), continued its development of environmental and social sustainability issues in 2025, performing actions in various business areas (products, investments, claims management) and specific initiatives aimed at generating a concrete impact on society. The Intesa Sanpaolo Assicurazioni Group integrates ESG factors in the various business areas

in which it operates in line with the requirements of the legislation and with the commitments assumed with its membership of the NetZero Asset Owner Alliance, the UN's PSIs (Principles for Sustainable Insurance) and with the principles defined by other international initiatives, including the United Nations Global Compact and the Equator Principles, to which the parent company Intesa Sanpaolo has signed up to and which are part of the aims to achieve the UN's Sustainable Development Goals. In 2025, the organisational unit continued its activities dedicated to sustainability, in line with its aim to coordinate the ESG projects of the Companies in the Insurance Group, promote internal and external initiatives to spread the culture of sustainability and facilitate its implementation together with the relevant functions. In addition, it has the task of coordinating the transversal positioning initiatives of the Insurance Group in the ESG field, promoting those related to the insurance culture and acting as a point of contact with the bank's Parent Company and external stakeholders. As part of the Life Business, in which the Insurance Group operates with the companies Intesa Sanpaolo Assicurazioni and Fideuram Vita, the commitment towards offering customers an increasingly wide range of investment options under Articles 8 and 9 of Regulation (EU) 2019/2088 (SFDR) continued.

Climate change

(3.6.1.1) Opportunity identifier

☑ Opp6

(3.6.1.3) Opportunity type and primary environmental opportunity driver

☑ Markets

☑ Increased sales of liability and other insurance to cover environmental risks

(3.6.1.4) Value chain stage where the opportunity occurs

☑ Insurance underwriting portfolio

(3.6.1.5) Country/area where the opportunity occurs

☑ Italy

(3.6.1.8) Organization specific description

During 2025, the Intesa Sanpaolo Assicurazioni Group continued to develop and evolve the products and services offer for all its business lines to meet customer needs on sustainability issues. In line with its ongoing commitment to sustainability, also outlined within the corporate policies, the Insurance Group's goal is to continue the evolution of its offer, including new products and insurance coverages over the coming years, as well as the revision of product processes with an ESG perspective. Some of those are related to climate and environmental matters.

(3.6.1.9) Primary financial effect of the opportunity

☑ Increased portfolio value due to upward revaluation of assets

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

☑ Medium

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

In 2025, the Non-Life offer underwent several changes aimed at aligning it more closely with ESG principles. Within the scope of the Non-Life Business, the Insurance Group is active with products covering mobility, cars and motorcycles, as well as home, theft, fire, catastrophic events, etc, also for SME and Corporate sectors. The financial effect of this opportunity is mainly attributable to insurance premiums and income from commissions related to the Non-Life Business. In response to the evolving regulatory framework regarding the management and coverage of risks related to climate change, the Insurance Group has also developed the "Protezione Catastrofi Naturali Business" product, aimed at supporting adaptation to climate change and protecting businesses from the effects of extreme weather events. In particular, within the product, the guarantees for flood, inundation, overflow, and waterlogging comply with the technical screening criteria defined within Regulation (EU) 2021/2139 for insurance activities, which include, among other features, pricing techniques that also consider climate change aspects in risk modeling, based not only on historical data but also integrating forward-looking scenarios.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

512600000

(3.6.1.23) Explanation of financial effect figures

In line with the objective of the 2022–2025 Business Plan to strengthen its position in non-motor non-life insurance, Intesa Sanpaolo Protezione increased its exposure to premium coverage in the Home and Family segment, reaching €300.8 million at the end of 2025, compared with €284.8 million at the end of 2024, and in the Business segment, reaching €211.8 million at the end of 2025, compared with €184.3 million at the end of 2024, in both cases including green products.

(3.6.1.24) Cost to realize opportunity

198600

(3.6.1.25) Explanation of cost calculation

Annual cost is related to the main actors directly involved in sustainable issues and projects, particularly those functions that cooperate in the development of products and services and in the application of sustainability policies. The cost includes the 3 FTEs working in the divisions involved in activities related to the opportunity (every FTE at Intesa Sanpaolo has an average annual cost of 66,200 euro). Specifically regarding opportunities, the main activities concern product development and involve, among others, the Product development and Marketing functions. Among the other functions, the Sustainability unit oversees the dissemination and adoption of sustainability principles in the underwriting business, promotes the integration of environmental, social, and governance factors into business processes, and monitors market practices, proposing interventions to introduce innovations in corporate methodologies and processes to Senior Management. In addition, the Risk Management and Commercial functions contribute to Risk assessment and Products development activities, respectively.

(3.6.1.26) Strategy to realize opportunity

The ISPA Group offers a wide range of insurance products to protect individuals, homes, vehicles, SMEs and corporate clients. To meet customer needs, the ISPA Group provides products with environmental and social features, including extended guarantees for photovoltaic and solar plants, home assistance services, green-certified buildings, solutions for vulnerable individuals, and health insurance for senior customers and their caregivers. In response to the evolving regulatory framework on climate-related risks management and coverage, including the requirement introduced by the Italian Budget Law 2024 for Italian companies to insure against catastrophic events by December 31, 2024, the Group has developed the “Protezione Catastrofi Naturali Business” product to support climate change

adaptation and protect businesses against extreme weather events. Within the product, guarantees for flood, inundation, overflow, and waterlogging comply with the technical screening criteria of Regulation (EU) 2021/2139, including pricing techniques that consider climate change aspects in risk modeling, based on historical data and forward-looking climate scenarios. Following a claims assessment, customers adopting preventive measures (flood barriers and water suction systems) benefit from a deductible reduction from 15% to 10%. By rewarding prevention, the Group aims to foster a virtuous circle in which prevention reduces the risk and damage from extreme natural events while consolidating collective resilience and the protection of assets. To support this approach, targeted training is provided to both the sales network, to promote these solutions and raise customer awareness, and the expert network, to ensure claims are assessed consistently with the preventive measures adopted. Within the Property & Casualty business, the Group also offers products covering catastrophic risks and environmental damages. Among these, the Home Modules of the XME Protection product offers dedicated protection against catastrophic events and targeted coverage for climate risks arising from extreme natural phenomena. Under the Home Coverage Module, customers installing preventive measures (e.g., wind and hail-resistant shutters or blinds) are rewarded through the waiver of deductibles for damage caused by atmospheric and electrical events, where the required measures are verified at the time of the claim.

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

☑ Assets

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

27400000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

☑ 1-10%

(3.6.2.4) Explanation of financial figures

Specifically in 2025, around €21.1bn in relation to Green Economy, Circular Economy and ecological transition (of which 4.3. billion euro were disbursed thanks to the S-Loan offer, designed to support SMEs seeking to improve their sustainability profile and around €3.3bn of loans in relation to the Green and Circular credit facility) and around €6.3bn of Green Mortgages were disbursed. The product range covers all customer segments: retail customers, corporates and businesses and Third sector.

Climate change

(3.6.2.1) Financial metric

☑ Assets

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

1880000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

In 2018 Eurizon became the first Italian asset management company to establish a green bond fund (Eurizon Fund - Absolute Green Bonds) through Eurizon Capital SA. Assets managed by the Fund amounted to over to over €906.7mln as at 31/12/2025. In February 2021, Eurizon launched Eurizon Fund - Green Euro Credit. Assets managed by the Fund amounted to over €978.4mln as at 31.12.2025. The total outstanding at the end of 2025 was €1.88bn. In 2025, the Asset Manager updated the Green Bonds Impact Report of the Eurizon Fund Absolute Green Bonds and Eurizon Fund Green Euro Credit sub-funds where the results of the quantitative impact analysis and the contribution to the United Nations SDGs are reported. The investments made by Eurizon Fund - Absolute Green Bonds and Eurizon Fund - Green Euro Credit have contributed to important environmental impacts. In addition, in 2025 Eurizon launched Eurizon Fund - Green Bonds Short Term and the assets managed by the Fund amounted to over €118.5mln as at 31.12.2025.

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

☑ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

☑ Executive directors or equivalent
☑ Non-executive directors or equivalent
☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

ISP's Articles of Association includes a specific reference to Diversity and Inclusion. Please see page 10, art. 13.1. – Composition. "The less represented gender shall be reserved at least two fifths of the seats on the Board of Directors, as of the first renewal of the Board of Directors after 1 January 2020. If this does not yield a whole number, the result shall be rounded up to the next whole number". The Board adopts the necessary measures to ensure that each Director, and the Board as a whole, have a continually adequate level of diversification, including in terms of experience, age, gender and international orientation, in addition to competence, reputation and fairness, independence of mind, and time commitment. Please note that on the occasion of the renewal of the Board of Directors, in April 2025, compliance with the new gender proportion - equal to 2/5 of the Board Members - was ensured. The document is publicly available on ISP's website. In the Board of Directors at 31/12/2025 there are 8 women (accounting for 42% of Directors), or a gender ratio of 0.73. In addition, women are represented in all Board Committees,

making up 60% of the members of the Nomination Committee, the Remuneration Committee and the Committee for Transactions with Related Parties and have the chairmanship of 3 committees. With respect to ESG knowledge, 84% of the Directors declared they possess expertise and skills at a very good/distinctive level in sustainability issues.

(4.1.6) Attach the policy (optional)

20260703_Statuto_uk.pdf

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	☑ Yes
Forests	☑ Yes
Water	☑ Yes
Biodiversity	☑ Yes

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

☑ Board Terms of Reference
☑ Board mandate
☑ Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Overseeing and guiding public policy engagement
☑ Reviewing and guiding innovation/R&D priorities
☑ Approving and/or overseeing employee incentives

☑ Monitoring progress towards corporate targets
☑ Approving corporate policies and/or commitments
☑ Overseeing reporting, audit, and verification processes
☑ Monitoring the implementation of a climate transition plan
☑ Overseeing and guiding the development of a business strategy
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Overseeing and guiding major capital expenditures
☑ Monitoring the implementation of the business strategy

(4.1.2.6) Scope of board-level oversight

☑ Risks and opportunities to our own operations
☑ Risks and opportunities to our banking activities
☑ The impact of our own operations on the environment
☑ Risks and opportunities to our investment activities
☑ The impact of our banking activities on the environment
☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

Environmental & Climate Change issues are supervised by BoD, which defines and approves the strategies and policies on sustainability (ESG), with the support of a committee internal to the Board, the Risks and Sustainability Committee. The Risks and Sustainability Committee supports the BoD, inter alia, in: a) reviewing and approving proposals associated with strategic, business and financial plans, also taking into account the sustainability policies (ESG) and the budgets of the Bank and the Group, further to evaluation of the stress test results; b) verifying that sustainability risks - when defining risk appetite and, where appropriate, risk tolerance - and in particular climate and environmental risks, are included in the framework for determining risk appetite (RAF) and in reviewing and assessing risks indicated; c) approving list of ESG-sensitive sectors relevant to the financing activities; d) assessing the opinions issued by the Risk Management function with regard to the most significant transactions that are relevant to reputational risks and ESG-Climate change; e) assessing and determining matters relating to the materiality analysis, both in terms of impact and financial materiality, also with the purpose of approving the Consolidated Sustainability Statement. This analysis identifies environmental, social and governance aspects that may be significant, considering impacts, risks and opportunities, in accordance with applicable regulations and the associated methodology; f) approving the Consolidated Sustainability Statement, as well as any other report of particular importance in this area submitted to the Board of Directors, including the Climate Report, and g) examining the Pillar 3 disclosure. In 2025, 23 meetings of the BoD were held, which also addressed ESG topics. A total of 44 meetings of Risks and Sustainability Committee were held during 2025, which also covered ESG matters, such as, the review of operational and ESG risks; the examination of the key topics in the area of sustainability, together with the Consolidated Sustainability Statement, the Sustainability Reporting, the

Reputational Risk Management Framework and the updated Business Environment Scan; the review of the progress of activities for the implementation of the Corporate Sustainability Reporting Directive, examining in detail the outcomes of the Double Materiality assessment; the examination of the updating of the relevant Guidelines. Finally, Risks and Sustainability Committee supports the Board in exercising strategic supervisory functions in the area of control of Most Significant Transactions, subject to prior review by the Risk Management function. The Committee examined the 2025 Budget, including Capital and Funding Plan. Each year, the Committee assesses the implementation of Code of Ethics and social responsibility principles, as well as the Environmental Head's Report.

Forests

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Approving corporate policies and/or commitments
☑ Monitoring compliance with corporate policies and/or commitments

☑ Monitoring the implementation of the business strategy

☑ Overseeing and guiding the development of a business strategy

(4.1.2.6) Scope of board-level oversight

☑ Risks and opportunities to our banking activities

☑ The impact of our banking activities on the environment

(4.1.2.7) Please explain

Nature related issues are supervised by the BoD which approves the strategic guidelines and policies on ESG matters, with the support of a Committee internal to the Board, the Risks and Sustainability Committee. Supported by this Committee, the Board of Directors: a) examines and approves the Code of Ethics, which describes ISP's commitment, among others, to environmental responsibilities, and the Group's Code of Conduct; b) defines and approves strategies and policies, among others, on environmental sustainability; c) defines and approves the risk objectives, incorporating sustainability-related risks (ESG) – in particular climate and environmental risks – in its risk appetite framework; d) approves the Group's Guidelines for the governance of ESG risks which identify sectors sensitive to ESG and Reputational risks, among which "Forestry". Furthermore, the Guidelines define how environmental factors, including "the responsible use of natural resources (e.g. water)" and the "adoption of policies to combat pollution, waste of natural resources and deforestation", are considered in the risk management and framework - the Consolidated Sustainability Statement, Climate Report and Risk Tableau de Bord, among others. Examples of decisions made in 2025 by the Risks and Sustainability Committee (Board-level committee) which had an impact on forests and water related issues: 1. It has favourably examined the update of the Code of Ethics, approved by the BoD in early 2025, with strengthened commitment to the protection of the environment and promotion of biodiversity; 2. It has favourably examined the Rules on Biodiversity and Nature, which were adopted by the Group in January 2025; 3. It has examined the key topics in the area of sustainability, together with the Consolidated Sustainability Statement, the Sustainability Reporting, the Reputational Risk Management Framework and the updated Business Environment Scan; 4. It has favourably examined the 2025 Climate Report, which includes a section on natural capital protection and biodiversity. Furthermore, the Group, after a pilot exercise that was launched in 2023, has integrated nature-related risks (i.e., financial risks deriving from the impact on biodiversity or from dependencies related to natural capital or ecosystem services), within the risk management framework focusing on Non-Financial Corporations exposures.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Approving corporate policies and/or commitments
☑ Monitoring compliance with corporate policies and/or commitments

(4.1.2.6) Scope of board-level oversight

☑ Risks and opportunities to our banking activities
☑ The impact of our banking activities on the environment

(4.1.2.7) Please explain

Nature related issues are supervised by the BoD which approves the strategic guidelines and policies on ESG matters, with the support of a Committee internal to the Board, the Risks and Sustainability Committee. Supported by this Committee, the Board of Directors: a) examines and approves the Code of Ethics, which describes ISP's commitment, among others, to environmental responsibilities, and the Group's Code of Conduct; b) defines and approves strategies and policies on sustainability (ESG); c) defines and approves the risk objectives, incorporating sustainability-related risks (ESG) – in particular climate and environmental risks – in its

risk appetite framework; d) approves the Group's Guidelines for the governance of ESG risks which identify sectors sensitive to ESG and Reputational risks; e) examines and approves the results of the impact and financial materiality analysis, which identifies the aspects related to environmental, social and governance sustainability that are relevant with regard to the considered impacts, risks and opportunities, in compliance with the applicable regulations. Furthermore, the Guidelines define how environmental factors, including "the responsible use of natural resources (e.g. water)" and the "adoption of policies to combat pollution, waste of natural resources and deforestation", are considered in the risk management and framework - the Consolidated Sustainability Statement, Climate Report and Risk Tableau de Bord, among others. Examples of decisions made in 2025 by the Risks and Sustainability Committee (Board-level committee) which had an impact on forests and water related issues: 1. It has favourably examined the update of the Code of Ethics, approved by the BoD in early 2025, with strengthened commitment to the protection of the environment and promotion of biodiversity. 2. It has favourably examined the 2025 SDG Report, which contains a focus on Group monitoring on natural resource usage, such as water consumption 3. It has favourably examined the Group's materiality assessment, where water and marine resources were evaluated. Furthermore, the Group, after a pilot exercise that was launched in 2023, has integrated nature-related risks (i.e., financial risks deriving from the impact on biodiversity or from dependencies related to natural capital or ecosystem services), within the risk management framework focusing on Non-Financial Corporations exposures. The methodology focuses on Non-Financial Corporations (NFC) counterparties and considers key risk drivers related to terrestrial and water biomes (e.g.air pollution, water stress, crop and timber provisioning).

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Approving corporate policies and/or commitments
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a business strategy
☑ Monitoring the implementation of the business strategy

(4.1.2.6) Scope of board-level oversight

☑ Risks and opportunities to our own operations
☑ Risks and opportunities to our banking activities
☑ The impact of our own operations on the environment
☑ Risks and opportunities to our investment activities
☑ The impact of our banking activities on the environment
☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

Nature related issues are supervised by the BoD which approves the strategic guidelines and policies on ESG matters, with the support of a Committee internal to the Board, the Risks and Sustainability Committee. Supported by this Committee, the Board of Directors: a) examines and approves the Code of Ethics, which describes ISP's commitment, among others, to environmental responsibilities, and the Group's Code of Conduct; b) defines and approves strategies and policies on sustainability (ESG); c) defines and approves the risk objectives, incorporating sustainability-related risks (ESG) – in particular climate and environmental risks – in its risk appetite framework; d) approves the list of ESG and/or reputational sensitive areas relevant for the financing activities, assessing them based on the analysis of the external environment and in line with the Group's strategic and sustainability objectives; e) approves the Group's Guidelines for the governance of ESG risks which identify sectors sensitive to ESG and Reputational risks, among which "Forestry". Furthermore, the Guidelines define how environmental factors, including "the responsible use of natural resources (e.g. water)" and the "adoption of policies to combat pollution, waste of natural resources and deforestation", are considered in the risk management and framework - the Consolidated Sustainability Statement, Climate Report and Risk Tableau de Bord, among others. Examples of decisions made in 2025 by the Risks and Sustainability Committee (Board-level committee) which had an impact on forests and water related issues: 1. It has favourably examined the Rules on Biodiversity and Nature, which were adopted by the Group in January 2025. 2. It has favourably examined the update of the Code of Ethics, approved by the BoD in early 2025, with strengthened commitment to the protection of the environment and promotion of biodiversity 3. It has favourably examined the 2025 Climate Report, which includes a section on natural capital protection and biodiversity. Furthermore, the Group, after a pilot exercise that was launched in 2023, has integrated biodiversity and details on the integration of nature-related risks (i.e., financial risks deriving from the impact on biodiversity or from dependencies related to natural capital or ecosystem services), within the risk management framework focusing on Non-Financial Corporations (NFC) exposures.

(4.2) Does your organization’s board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

☑ Consulting regularly with an internal, permanent, subject-expert working group
☑ Engaging regularly with external stakeholders and experts on environmental issues
☑ Integrating knowledge of environmental issues into board nominating process
☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience
☑ Experience in an academic role focused on environmental issues
☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

Forests

(4.2.1) Board-level competency on this environmental issue

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

☑ Integrating knowledge of environmental issues into board nominating process
☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

Water

(4.2.1) Board-level competency on this environmental issue

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

☑ Integrating knowledge of environmental issues into board nominating process

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	☑ Yes
Forests	☑ Yes
Water	☑ Yes

	Management-level responsibility for this environmental issue
Biodiversity	☑ Yes

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

☑Executive level
☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position☑

☑ Dependencies, impacts, risks and opportunities
☑ Assessing environmental dependencies, impacts, risks, and opportunities
☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
☑ Managing environmental dependencies, impacts, risks, and opportunities

☑ Policies, commitments, and targets
☑ Monitoring compliance with corporate environmental policies and/or commitments
☑ Measuring progress towards environmental corporate targets
☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental policies and/or commitments
☑ Setting corporate environmental targets

☑ Strategy and financial planning
☑ Developing a climate transition plan
☑ Implementing a climate transition plan
☑ Managing annual budgets related to environmental issues
☑ Implementing the business strategy related to environmental issues
☑ Developing a business strategy which considers environmental issues
☑ Managing environmental reporting, audit, and verification processes
☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities
☑ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

The Chief Sustainability Officer (CSO) Governance Area plays a central role in guiding the Group's sustainable development and ensuring the integration of sustainability into business strategies. This Area is responsible for:i) developing and implementing the Group's ESG strategy, collaborating on ESG reporting;ii)

overseeing the definition and monitoring of ESG quantitative and qualitative targets;iii) identification of actions consistent with the Group's strategic objectives;iv) supporting the business units in the transition of customer segments towards a sustainable economy, assisting them in keeping up with evolving ESG regulations and in identifying new business opportunities aligned with the Group's sustainability goals;v) ensuring the functioning of the ESG Control Room and related Tables. Supported by the ESG Steering, the CSO defines ESG guidelines, policies, strategic initiatives, and oversees the Group's ESG Scoring model for banking book portfolios designed to assess the current and future positioning of Parent Company and subsidiaries banks' corporate customer with regard to sustainability. The CSO Governance Area also includes the Chief Social Impact Officer and the Innovation Center&Investments. The CSO chairs the ESG Control Room and Panels to support the Steering Committee in promoting ESG policies and strategies, monitor the achievement of objectives and examine any necessary actions to achieve results. Activities include: analysing and monitoring the Own Emissions Plan, integrating ESG criteria into equity investments and credit strategies, reviewing ESG reports, and sharing ESG regulatory insights. The CSO, CFO, CRO and CLO Areas cooperate in the application of ISP credit strategies framework, that among its pillars has the evaluation of ESG Sectoral strategy. Furthermore, the CSO Area issued the Sustainable Lending Framework effective from January 2026, with the purpose of defining the Group's methodology for classifying lending as sustainable.

Forests

(4.3.1.1) Position of individual or committee with responsibility

☑ Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Implementing the business strategy related to environmental issues

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

The Chief Sustainability Officer (CSO) Governance Area, reporting directly to the CEO, plays a central role in guiding the Group's sustainable development and ensuring the definition and integration of sustainability into business strategies. Within the Area, ESG Steering supports the Head of the CSO Governance Area in defining ESG guidelines, policies and strategic initiatives, ensuring their alignment with the Group's overall strategy and objectives.The CSO Governance Area is responsible for: i) developing and implementing the Group's ESG strategy also collaborating on ESG reporting; ii) overseeing the definition and monitoring of ESG quantitative and qualitative targets; iii) identification of actions consistent with the Group's strategic objectives; iv) supporting the business units in the transition of customer segments towards a sustainable economy, assisting them in keeping up with evolving ESG regulations and in identifying new business opportunities aligned with the Group's sustainability goals; v) ensuring the operational functioning of the ESG Control Room and related Tables. In 2021, the CSO Area developed the ESG score, a proprietary methodology for assessing the sustainability performance of client companies which also considers components concerning biodiversity and natural resources. The CSO Area is also involved in the Think Forestry programme, a reforestation and natural capital preservation project aimed at supporting client companies in their environmental transition. The CSO Area coordinates the Think Forestry programme, ensuring its alignment with the Group's sustainability strategy. Furthermore, the CSO Area issued the Sustainable Lending Framework effective from January 1, 2026, which has the purpose of defining the Group's methodology for classifying lending as sustainable. The framework includes, among others, the category: Environmentally sustainable management of natural resources and land use.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Annually

(4.3.1.6) Please explain

Management of Climate Change(CC) and Environment matters involves CRO, which reports to CEO and meets regularly with the Risks and Sustainability Committee. CRO ensures the measurement and control of the exposure to ESG risks and, in particular, CC and environmental risks. The CRO provides quarterly updates to the Risks and Sustainability Committee on the monitoring of the loan portfolio's exposure to business sectors with higher ESG risk (in particular CC/environmental risks). Within the CRO, Enterprise Risk Management (ERM) defines the Risk Appetite Framework which includes a specific focus on ESG and CC risks. It outlines within the RAF the level of ESG (including CC) and reputational risk appetite, defining specific limits, KRIs and actions. It oversees the processes to identify, assess and manage climate-related risks in collaboration with other departments (among others, defining climate sensitive sector policies, running stress test activities, scenario analysis and monitoring of climate risks in ongoing processes). It draws up and annually updates the Climate/ESG Materiality Assessment and the sectors most exposed to these risks; it verifies the alignment of the portfolios with Group decarbonisation targets, contributing to the definition of mitigation actions; it assesses the ESG (including CC) and reputational risk profiles of products/transactions/partnerships, supported by other control functions and business structures. The ERM department regularly reports on the Group's overall risk status through the 'Tableau de Bord of Risks,' which includes Reputational and ESG risks, compliance with risk appetite limits and risk trends. The CRO Area participates in the ESG Control Room, which drives ESG strategy and coordinates key intragroup

initiatives, including climate and environmental matters. In collaboration with CSO, CFO, and CLO, the CRO also implements the Group's credit strategy framework, which includes ESG sectoral strategy evaluation as a key pillar.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Managing environmental reporting, audit, and verification processes

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

The Chief Sustainability Officer (CSO) Governance Area plays a central role in guiding the Group's sustainable development and ensuring the definition and integration of sustainability into business strategies.The CSO Area is responsible for:i) developing and implementing ISP's ESG strategy also collaborating on ESG reporting;ii) overseeing the definition and monitoring of ESG quantitative and qualitative targets;iii) identification of actions consistent with ISP's strategic objectives;iv) supporting the business units in the transition of customer segments towards a sustainable economy, assisting them in keeping up with evolving ESG regulations and in identifying new business opportunities aligned with ISP's sustainability goals;v) ensuring the functioning of the ESG Control Room and related Tables. Supported by the ESG Steering, the CSO defines ESG guidelines, policies, strategic initiatives, manages ESG Control Room, and oversees the development of the Group's ESG Scoring model for banking book portfolios designed to assess the current and future positioning of Parent Company and subsidiaries banks' corporate customer with regard to sustainability. The CSO chairs the ESG Control Room and Panels to support the Steering Committee in promoting ESG business policies and strategies, monitor the achievement of objectives and examine any necessary actions to achieve results. Activities include: analysing and monitoring the Own Emissions Plan, integrating ESG criteria into equity investments and credit strategies, reviewing ESG reports, and sharing ESG regulatory insights. The CSO, CFO, CRO and CLO Areas cooperate in the application of ISP credit strategies framework, that among its pillars has the evaluation of ESG Sectoral strategy. The CSO Area issued the Sustainable Lending Framework, which defines ISP's methodology for classifying lending as sustainable. The framework includes category: Terrestrial and aquatic biodiversity restoration, conservation and enhancement.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Financial Officer (CFO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Managing annual budgets related to environmental issues

☑ Managing environmental reporting, audit, and verification processes

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

Management of Climate Change and Environment matters strongly involves CSO, CFO and CRO – and their structures. They report to the CEO and meet regularly with the Risks and Sustainability Committee. CSO, CFO and CRO participate to the ESG Control Room where the ESG strategy is carried out and which coordinates the main intragroup initiatives, also including Climate&Environmental matters. CRO, CFO and CSO, with the support of the various Governance Areas and Divisions, work together to identify and analyse ESG risks and opportunities with particular reference to climate change. More specifically, within the CFO area: the Administration, Regulatory Reporting & Tax Affairs is responsible for preparing the Consolidated Sustainability Statement, monitoring and interpreting the development of EU and national legislation, as well as providing regulatory interpretation of the EU Taxonomy Rules and calculating the related GAR; the Group Treasury & Capital Management is responsible for the origination and structuring of the Group's ESG bonds (green/social/sustainability bonds…) targeted to international and non-international institutional investors. GTCM is also responsible for the ESG technical documentation: the Green, Social and Sustainability Bond Framework and the Green and Social Bond Report; the Financial Market Coverage is responsible for managing relationships with the financial community and

conducting assessments, including those aimed at obtaining sustainability ratings and inclusion in major sustainability indices. In addition, the CLO chairs the Group Strategic Credit Committee, a collegial technical body with decision-making and advisory powers, responsible for the most relevant credit decisions in terms of Risk-Weighted Assets. The meetings also foresee the participation of the CSO (together with the CRO and CFO) to ensure that ESG risks are correctly framed into the credit decision.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ More frequently than quarterly

(4.3.1.6) Please explain

Management of Climate Change(CC) and Environment matters involves CRO, which reports to CEO and meets regularly with the Risks and Sustainability Committee. CRO ensures the measurement and control of the exposure to ESG risks and, in particular, CC and environmental risks. The CRO provides quarterly updates to the Risks and Sustainability Committee on the monitoring of the loan portfolio's exposure to business sectors with higher ESG risk (in particular CC/environmental risks). Within the CRO, Enterprise Risk Management (ERM) defines the Risk Appetite Framework which includes a specific focus on ESG and CC risks. It outlines within the RAF the level of ESG (including CC) and reputational risk appetite, defining specific limits, KRIs and actions. It oversees the processes to identify, assess and manage climate-related risks in collaboration with other departments (among others, defining climate sensitive sector policies, running stress test activities, scenario analysis and monitoring of climate risks in ongoing processes). It draws up and annually updates the Climate/ESG Materiality Assessment and the sectors most exposed to these risks; it verifies the alignment of the portfolios with Group decarbonisation targets, contributing to the definition of mitigation actions; it assesses the ESG (including CC) and reputational risk profiles of products/transactions/partnerships, supported by other control functions and business structures. The ERM department regularly reports on the Group's overall risk status through the 'Tableau de Bord of Risks,' which includes Reputational and ESG risks, compliance with risk appetite limits and risk trends. The CRO Area participates in the ESG Control Room, which drives ESG strategy and coordinates key intragroup initiatives, including climate and environmental matters. The CSO, CFO, CRO and CLO Areas cooperate in the application of ISP credit strategies framework, that among its pillars has the evaluation of ESG Sectoral strategy.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

Management of Climate Change(CC) and Environment matters involves CRO, which reports to CEO and meets regularly with the Risks and Sustainability Committee. CRO ensures the measurement and control of the exposure to ESG risks and, in particular, CC and environmental risks. The CRO provides quarterly updates to the Risks and Sustainability Committee on the monitoring of the loan portfolio's exposure to business sectors with higher ESG risk (in particular CC/environmental risks). Within the CRO, Enterprise Risk Management (ERM) defines the Risk Appetite Framework which includes a specific focus on ESG and CC risks. It outlines within the RAF the level of ESG (including CC) and reputational risk appetite, defining specific limits, KRIs and actions. It oversees the processes to identify, assess and manage climate-related risks in collaboration with other departments (among others, defining climate sensitive sector policies, running stress test activities, scenario analysis and monitoring of climate risks in ongoing processes). It draws up and annually updates the Climate/ESG Materiality Assessment and the sectors most exposed to these risks; it verifies the alignment of the portfolios with Group decarbonisation targets, contributing to the definition of mitigation actions; it assesses the ESG (including CC) and reputational risk profiles of products/transactions/partnerships, supported by other control functions and business structures. The ERM department regularly reports on the Group's overall risk status through the 'Tableau de Bord of Risks,' which includes Reputational and ESG risks, compliance with risk appetite limits and risk trends. The CRO Area participates in the ESG Control Room, which drives ESG strategy and coordinates key intragroup

initiatives, including climate and environmental matters. The CSO, CFO, CRO and CLO Areas all cooperate in the application of ISP credit strategies framework, that among its pillars has the evaluation of ESG Sectoral strategy.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Financial Officer (CFO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Managing environmental reporting, audit, and verification processes

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

Management of Climate Change and Environment matters strongly involves CSO, CFO and CRO – and their structures. They report to the CEO and meet regularly with the Risks and Sustainability Committee. CSO, CFO and CRO participate to the ESG Control Room where the ESG strategy is carried out and which coordinates the main intragroup initiatives, also including Climate&Environmental matters. CRO, CFO and CSO, with the support of the various Governance Areas and Divisions, work together to identify and analyse ESG risks and opportunities with particular reference to nature related topics. More specifically, within the CFO area: the Administration, Regulatory Reporting & Tax Affairs is responsible for preparing the Consolidated Sustainability Statement, monitoring and interpreting the development of EU and national legislation, as well as providing regulatory interpretation of the EU Taxonomy Rules and calculating the related GAR; the Group Treasury & Capital Management is responsible for the origination and structuring of the Group's ESG bonds (green/social/sustainability bonds…) targeted to international and non-international institutional investors. GTCM is also responsible for the ESG technical documentation: the Green, Social and Sustainability Bond Framework and the Green and Social Bond Report; the Financial Market Coverage is responsible for managing relationships with the financial community and conducting assessments, including those aimed at obtaining sustainability ratings and inclusion in major sustainability indices. In addition, the CLO chairs the Group Strategic Credit Committee, a collegial technical body with decision-making and advisory powers, responsible for the most relevant credit decisions in terms of Risk-Weighted Assets. The meetings also foresee the participation of the CSO (together with the CRO and CFO) to ensure that ESG risks are correctly framed into the credit decision.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

Management of Climate Change(CC) and Environment matters involves CRO, which reports to CEO and meets regularly with the Risks and Sustainability Committee. CRO ensures the measurement and control of the exposure to ESG risks and, in particular, CC and environmental risks. The CRO provides quarterly updates to the Risks and Sustainability Committee on the monitoring of the loan portfolio's exposure to business sectors with higher ESG risk (in particular CC/environmental risks). Within the CRO, Enterprise Risk Management (ERM) defines the Risk Appetite Framework which includes a specific focus on ESG and CC risks. It outlines within the RAF the level of ESG (including CC) and reputational risk appetite, defining specific limits, KRIs and actions. It oversees the processes to identify, assess and manage climate-related risks in collaboration with other departments (among others, defining climate sensitive sector policies, running stress test activities, scenario analysis and monitoring of climate risks in ongoing processes). It draws up and annually updates the Climate/ESG Materiality Assessment and the sectors most exposed to these risks; it verifies the alignment of the portfolios with Group decarbonisation targets, contributing to the definition of mitigation actions; it assesses the ESG (including CC) and reputational risk profiles of products/transactions/partnerships, supported by other control functions and business structures. The ERM department regularly reports on the Group's overall risk status through the 'Tableau de Bord of Risks,' which includes Reputational and ESG risks, compliance with risk appetite limits and risk trends. The CRO Area participates in the ESG Control Room, which drives ESG strategy and coordinates key intragroup initiatives, including climate and environmental matters. The CSO, CFO, CRO and CLO Areas all cooperate in the application of ISP credit strategies framework, that among its pillars has the evaluation of ESG Sectoral strategy.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Other C-Suite Officer, please specify :Chief Institutional Affairs and External Communication Officer

(4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing public policy engagement related to environmental issues

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Annually

(4.3.1.6) Please explain

ISP is actively engaged in contributing to the regulatory landscape it operates in, and constantly monitors the regulatory framework also on climate/environmental topics at the international, EU and national level through its Chief Institutional Affairs and External Communication Officer (CIAECO) Governance Area. At European level, ISP is interacting with regulators, authorities, major European trade associations and other stakeholders to provide the Group's contributions to various sustainability initiatives. ISP, through The European Regulatory & Public Affairs function, has been providing inputs to European institutions, both directly and through European trade associations, participating in selected European consultations, trade associations' working groups and events on various issues related to sustainability, climate change and other environmental topics. Within CIAECO, Group Supervisory Strategic Steering Department (GSSS) coordinates the relationships with the European Supervisory Authorities, monitoring the evolution of supervisory expectations, including those concerning climate and environmental risks. GSSS coordinates the supervisory access through on-site inspections, off-site reviews, and any subsequent follow-up activities with the engagement of the relevant internal Business Owners. Regularly and whenever relevant, the structures within the CIAECO Area inform all relevant functions (through seminars,

meetings, regulatory alerts, newsletters) of the upcoming regulatory and policy initiatives on sustainable finance, ensuring that all the positions expressed by the Group are consistent and in line with the strategy. Generally, the before mentioned activities are centrally coordinated by this Governance Area. The internal process requires that the advocacy activities are presented to the Risk and Sustainability Committee and BoD in the regulatory agenda process where a series of incoming regulations are presented and developments are reported.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Other committee, please specify :Steering Committee - composed of the first organisational lines

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Managing environmental reporting, audit, and verification processes

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

Chaired by the Managing Director and CEO, the Committee includes the Bank's first management line. The functions of the Steering Committee are carried out in plenary session and in special and distinct sessions. In particular as concerns ESG matters: The Steering Committee meets at least quarterly in a "Business Plan and Sustainability (ESG)" session, a specific session dedicated to ESG and climate-related matters and their inclusion in the Group's development plans. Among others, its responsibilities include: -collaborating in the definition of strategic guidelines and sustainability policies (ESG) including the model on corporate social and cultural responsibility and climate change, which the Managing Director and CEO submits to the competent Board Committees and to the Board of Directors; -examining, prior to approval by the Managing Director and CEO, the Rules implementing the Guidelines for the governance of environmental, social and governance (ESG) risks of the Group, which establish criteria, limitations and exclusions for transactions in sectors that are sensitive to ESG and/or Reputational risks, as well as classification criteria for credit products and sustainable lending transactions; -authorising in advance specific transactions of relevance to sustainability issues in the exceptional cases provided for in the Guidelines for the governance of environmental, social and governance (ESG) risks of the Group. Within ESG responsibilities, the Steering Committee collaborates in identifying and updating potentially relevant environmental, social, and governance issues in relation to the impacts, risks, and opportunities considered, in accordance with the applicable regulations, within the scope of the impact and financial materiality assessment.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Other committee, please specify :Steering Committee - composed of the first organisational lines

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Managing environmental reporting, audit, and verification processes

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

Chaired by the Managing Director and CEO, the Committee includes the Bank's first management line. The functions of the Steering Committee are carried out in plenary session and in special and distinct sessions. In particular as concerns ESG matters: The Steering Committee meets at least quarterly in a "Business Plan and Sustainability (ESG)" session, a specific session dedicated to ESG and climate-related matters and their inclusion in the Group's development plans. Among others, its responsibilities include: -collaborating in the definition of strategic guidelines and sustainability policies (ESG) including the model on corporate social and cultural responsibility and climate change, which the Managing Director and CEO submits to the competent Board Committees and to the Board of Directors; -examining, prior to approval by the Managing Director and CEO, the Rules implementing the Guidelines for the governance of environmental, social and governance (ESG) risks of the Group, which establish criteria, limitations and exclusions for transactions in sectors that are sensitive to ESG and/or Reputational risks, as well as classification criteria for credit products and sustainable lending transactions; -examining the Consolidated Sustainability Statement as well as the particularly significant reporting on the matter (e.g., Climate Report), prior to submission to the Board of Directors; -authorising in advance specific transactions of relevance to sustainability issues in the exceptional cases provided for in the Guidelines for the governance of environmental, social and governance (ESG) risks of the Group. Within ESG responsibilities, the Steering Committee collaborates in identifying and updating potentially relevant environmental, social, and governance issues in relation to the impacts, risks, and opportunities considered, in accordance with the applicable regulations, within the scope of the impact and financial materiality assessment.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Other C-Suite Officer, please specify :Chief Institutional Affairs and External Communication Officer

(4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing public policy engagement related to environmental issues

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Annually

(4.3.1.6) Please explain

ISP is actively engaged in contributing to the regulatory landscape it operates in, and constantly monitors the regulatory framework also on climate/environmental topics at the international, EU and national level through its Chief Institutional Affairs and External Communication Officer (CIAECO) Governance Area. At European level, ISP is interacting with regulators, authorities, major European trade associations and other stakeholders to provide the Group's contributions to various sustainability initiatives. ISP, through The European Regulatory & Public Affairs function, has been providing inputs to European institutions, both directly and through European trade associations, participating in selected European consultations, trade associations' working groups and events on various issues related to sustainability, climate change and other environmental topics. Within CIAECO, Group Supervisory Strategic Steering Department coordinates the relationships with the European Supervisory Authorities, monitoring the evolution of supervisory expectations, including those concerning climate and environmental risks. GSSS coordinates the supervisory access through on-site inspections, off-site reviews, and any subsequent follow-up activities with the engagement of the relevant internal Business Owners. Regularly and whenever relevant, the structures within the CIAECO Area inform all the relevant functions of the Group (through seminars, meetings, regulatory alerts, newsletters) of the upcoming regulatory and policy initiatives on sustainable finance, ensuring that all the positions expressed by the Group are consistent and in line with the strategy. Generally, the before mentioned activities are centrally coordinated by this Governance Area. The internal process requires that the advocacy activities are presented to the Risk and Sustainability Committee and BoD in the regulatory agenda process where a series of incoming regulations are presented and developments are reported.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Other C-Suite Officer, please specify :Chief Institutional Affairs and External Communication Officer

(4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing public policy engagement related to environmental issues

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Annually

(4.3.1.6) Please explain

ISP is actively engaged in contributing to the regulatory landscape it operates in, and constantly monitors the regulatory framework also on climate/environmental topics at the international, EU and national level through its Chief Institutional Affairs and External Communication Officer (CIAECO) Governance Area. At European level, ISP is interacting with regulators, authorities, major European trade associations and other stakeholders to provide the Group's contributions to various sustainability initiatives. ISP, through The European Regulatory & Public Affairs function, has been providing inputs to European institutions, both directly and through European trade associations, participating in selected European consultations, trade associations' working groups and events on various issues related to sustainability, climate change and other environmental topics. Within CIAECO, Group Supervisory Strategic Steering Department coordinates the relationships with the European Supervisory Authorities, monitoring the evolution of supervisory expectations, including those concerning climate and environmental risks. GSSS coordinates the supervisory access through on-site inspections, off-site reviews, and any subsequent follow-up activities with the engagement of the relevant internal Business Owners. Regularly and whenever relevant, the structures within the CIAECO Area inform all the relevant functions of the Group (through seminars, meetings, regulatory alerts, newsletters) of the upcoming regulatory and policy initiatives on sustainable finance, ensuring that all the positions expressed by the Group are consistent and in line with the strategy. Generally, the before mentioned activities are centrally coordinated by this Governance Area. The internal process requires that the advocacy activities are presented to the Risk and Sustainability Committee and BoD in the regulatory agenda process where a series of incoming regulations are presented and developments are reported.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

(4.3.1.3) Coverage of responsibilities

☑ Dependencies, impacts, risks, and opportunities related to our banking activities

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Quarterly

(4.3.1.6) Please explain

The Chief Sustainability Officer (CSO) Governance Area plays a central role in guiding the Group's sustainable development and ensuring the definition and integration of sustainability into business strategies. The CSO Governance Area is responsible for:i) developing and implementing the Group's ESG strategy also collaborating on ESG reporting; ii) overseeing the definition and monitoring of ESG quantitative and qualitative targets; iii) identification of actions consistent with the Group's strategic objectives; iv) supporting the business units in the transition of customer segments towards a sustainable economy, assisting them in keeping up with evolving ESG regulations and in identifying new business opportunities aligned with the Group's sustainability goals; v) ensuring the functioning of the ESG Control Room and related Tables. The CSO chairs the ESG Control Room and Panels to support the Steering Committee in promoting ESG business policies and strategies, monitor the achievement of objectives and examine any necessary actions to achieve results. Furthermore, the CSO Area issued the Sustainable Lending Framework effective from January 1, 2026, which has the purpose of defining the Group's methodology for classifying lending as sustainable. The framework includes, among others, the category: Sustainable water and wastewater management.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Other C-Suite Officer, please specify :Chief Institutional Affairs and External Communication Officer

(4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing public policy engagement related to environmental issues

(4.3.1.4) Reporting line

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

☑ Annually

(4.3.1.6) Please explain

ISP is actively engaged in contributing to the regulatory landscape it operates in, and constantly monitors the regulatory framework also on climate/environmental topics at the international, EU and national level through its Chief Institutional Affairs and External Communication Officer (CIAECO) Governance Area. At European level, ISP is interacting with regulators, authorities, major European trade associations and other stakeholders to provide the Group's contributions to various sustainability initiatives. ISP, through The European Regulatory & Public Affairs function, has been providing inputs to European institutions, both directly and through European trade associations, participating in selected European consultations, trade associations' working groups and events on various issues related to sustainability, climate change and other environmental topics. Within CIAECO, Group Supervisory Strategic Steering Department coordinates the relationships with the European Supervisory Authorities, monitoring the evolution of supervisory expectations, including those concerning climate and environmental risks. GSSS coordinates the supervisory access through on-site inspections, off-site reviews, and any subsequent follow-up activities with the engagement of the relevant internal Business Owners. Regularly and whenever relevant, the structures within the CIAECO Area inform all the relevant functions of the Group (through seminars,

meetings, regulatory alerts, newsletters) of the upcoming regulatory and policy initiatives on sustainable finance, ensuring that all the positions expressed by the Group are consistent and in line with the strategy. Generally, the before mentioned activities are centrally coordinated by this Governance Area. The internal process requires that the advocacy activities are presented to the Risk and Sustainability Committee and BoD in the regulatory agenda process where a series of incoming regulations are presented and developments are reported.

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

15

(4.5.3) Please explain

Incentives are provided for the Executive member of BoD (CEO) and all C-suite for managing environmental and climate change issues. In the short-term variable remuneration, among the non-financial KPIs, the ESG KPI (weight of 15%) includes drivers such as: Support to green and circular economy: development of loans of the Corporate scope from an ESG perspective; support for Green Mortgages of BdT, etc; Performance evaluation is annual. For the CFO, CSO and CSIO (Chief Social Impact Officer), the percentage is raised to 20% as part of the ESG Control Room. Moreover, long-term incentive plans (for CEO, Management and Professionals) include a composite KPI with a 40% Environmental component focused on green and circular lending and ecological transition, with a focus on Corporate/SMEs transition.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

☑ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

Long term ESG KPIs have already been set in 2022 till 2025, in relation to the time horizon of the 2022-2025 Business Plan. The Environmental component of the composite KPI of the Long-Term Incentive plan is based on new lending to the green/circular economy and ecological transition, with a focus on Corporate/SMEs transition. In 2025, in conjunction with the launch of the 2026–2029 Business Plan, the Group confirmed the use of long-term incentive plans. In particular, the Performance Share Plan 2026–2029, which applies to management including the CEO, includes "Sustainable Lending" among its performance objectives. Short term KPIs are decided year on year, currently they do not include any water and forest KPIs.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

☑ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

Long term ESG KPIs have already been set in 2022 till 2025, in relation to the time horizon of the 2022-2025 Business Plan. The Environmental component of the composite KPI of the Long-Term Incentive plan is based on new lending to the green/circular economy and ecological transition, with a focus on Corporate/SMEs transition. In 2025, in conjunction with the launch of the 2026–2029 Business Plan, the Group confirmed the use of long-term incentive plans. In particular, the Performance Share Plan 2026–2029, which applies to management including the CEO, includes "Sustainable Lending" among its performance objectives. Short term KPIs are decided year on year, currently they do not include any water and forest KPIs.

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

☑ Bonus - % of salary
☑ Shares

(4.5.1.3) Performance metrics

Targets
☑ Progress towards environmental targets
☑ Achievement of environmental targets
☑ Organization performance against an environmental sustainability index

Strategy and financial planning
☑ Board approval of climate transition plan
☑ Achievement of climate transition plan
☑ Increased green asset ratio of portfolio/fund
☑ Shift to a business model compatible with a net-zero carbon future

(4.5.1.4) Incentive plan the incentives are linked to

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

Short term incentive: among the non-financial KPIs, the CEO was assigned ESG KPIs with a weight of 15%. These KPIs are evaluated according to specific drivers, among which: - presence of ISP in the sustainability indices of specialised companies - support to green and circular economy: a) development of the loans from an ESG perspective; b) support for Green Mortgages and Social Lending of Banca dei Territori; - sustainable investments: ESG investments as a percentage of total Asset under Management (AuM). Generally, all of these contribute to the achievement of the climate transition plan. The performance evaluation period (accrual period) is annual. Long term incentive: the Performance Share Plan (PSP) is addressed to the Management (approximately 3,100 beneficiaries – including the CEO), based on shares awarded upon the achievement of performance targets consistent with the Business Plan. The Plan is aimed at enhancing sustainable performance over time and therefore, it includes an ESG composite KPI based on three sub-KPIs, one for each of the three factors: E-S-G, where E weights 40% and is based on

new lending to the green/circular economy and ecological transition, with a focus on Corporate/SMEs transition. The ESG KPI, which target level is defined in the 2022-2025 Business Plan, acts as a demultiplier by reducing by 10/20% the number of vested shares depending on the degree of target non-achievement in the 2022-2025 Business Plan. Time horizon corresponds to the Business Plan time horizon: 2022-2025.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Both short term and long term incentive plans are linked to the targets set out in the ESG Pillar of the 2022-2025 Business Plan. In this way they contribute to the achievement of the Business Plan itself (sustainable and transition finance, net zero aligned targets, both for own emissions and financed emissions, renewable energy etc.).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Senior-mid management

☑ Management group

(4.5.1.2) Incentives

☑ Bonus - % of salary

☑ Shares

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

☑ Reduction in absolute emissions in line with net-zero target

Emission reduction

☑ Implementation of an emissions reduction initiative

☑ Reduction in emissions intensity

☑ Reduction in absolute emissions

(4.5.1.4) Incentive plan the incentives are linked to

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

ISP's 2025 Group Remuneration Policies regulate the annual Incentive System that includes the ESG Group transversal KPIs assigned in the Performance Scorecards of Top and Middle Management, for about 3,000 resources. The ESG KPIs take into account several ESG factors in line with specific activities carried out by the Bank, incl. climate related factors. The evaluation of the ESG KPIs takes place both at Group level, with a view to recognizing the commitment of the Group as a whole, and at Governance Area / Division level, in order to enhance the areas of action of the individual Group structures. Specifically: - at Group level, the presence of ISP in the sustainability indexes; - at Governance Area/Division level: 1. specific projects in the ESG field, development of lending volumes relating to ESG (Sustainable Loans and Green Mortgages), reduction of exposures on sectors at ESG risk, growth of Sustainable Investments through the increase in the % incidence of AuM present in Asset Management products classified under Articles 8 and 9 pursuant to Regulation (EU) 2019/2088, reduction of the Group's CO2 emissions. The performance evaluation period is annual. A 15% weight was assigned to the ESG transversal KPI. This is raised to 20% for the Chief Financial Officer, Chief Sustainability Officer and Chief Social Impact Officer. The ESG component is also included in the Long-Term Incentive Plan (Performance Share Plan - PSP) launched in conjunction with the 2022- 2025 Business Plan. The PSP is addressed to the Management (about 3,100 beneficiaries – incl. the CEO), based on shares and subject to the achievement of performance objectives. The Plan is aimed at enhancing sustainable performance over time and includes an ESG composite KPI based on 3 sub-KPIs (E,S,G). The Environmental sub KPI includes new loans for the green/circular economy and the ecological transition with a special focus on supporting the Corporate/SME transition (weight 40%). The ESG KPI, which target level is defined in the 2022-2025 Business Plan, acts as a de-multiplier by reducing by 10/20% the number of vested shares, depending on the degree of target non-achievement.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Both short term and long term incentive plans are linked to the targets set out in the ESG Pillar of the 2022-2025 Business Plan. In this way they contribute to the achievement of the Business Plan itself (sustainable and transition finance, net zero aligned targets, both for own emissions and financed emissions, renewable energy etc.).

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	☑ Yes

(4.6.1) Provide details of your environmental policies.

(4.6.1.1) Environmental issues covered

☑ Climate change
☑ Forests
☑ Water
☑ Biodiversity

(4.6.1.2) Level of coverage

☑ Organization-wide

(4.6.1.3) Value chain stages covered

☑ Direct operations
☑ Upstream value chain
☑ Downstream value chain
☑ Portfolio

(4.6.1.4) Explain the coverage

The Group generates environmental impacts from both its direct activities (direct impacts on the environment) and, more importantly, from its business (indirect impacts on the environment). Indeed, in addition to managing its own environmental footprint, the Group can also exert a strong influence on the activities and behaviour of its customers and suppliers, including by directing financial resources, in the short and long term, to favour a low carbon economy and environmental protection. The policy covers all segments of the value chain: direct operations (in the chapter Principles of conduct regarding the environment); upstream value chain (in the chapters Principles of conduct in supplier relations and Principles of conduct regarding the environment); downstream value chain and portfolio (i.e. portfolio activity covering all portfolios - banking, asset management, asset owner and insurance – in the chapter Principles of conduct in customer relations and Principles of conduct regarding the environment).

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to respect legally designated protected areas

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

☑ Commitment to 100% renewable energy

☑ Commitment to net-zero emissions

Water-specific commitments

☑ Commitment to reduce water consumption volumes

☑ Other water-related commitment, please specify :pursuing conscious consumption of resources including through the implementation of an environmental impact management system, and promoting the progressive improvement of water efficiency

Social commitments

☑ Adoption of the UN International Labour Organization principles

☑ Commitment to promote gender equality and women’s empowerment

☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities

☑ Commitment to respect internationally recognized human rights

Additional references/Descriptions

☑ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

☑ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

☑ Publicly available

(4.6.1.8) Attach the policy

Code of Ethics.pdf

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
Banking (Bank)	☑ Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
Investing (Asset manager)	☑ Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies
Investing (Asset owner)	☑ Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies
Insurance (Insurance company)	☑ Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies

(4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.

Banking (Bank)

(4.7.1.1) Environmental issues covered

☑ Climate change
☑ Biodiversity

(4.7.1.2) Type of policy

☑ Risk policy

(4.7.1.3) Public availability

☑ Publicly available

(4.7.1.4) Attach the policy

Guidelines_for_the_governance_of_ESG_risks_abstract_Rules_on_biodiversity_and_nature_abstract.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

☑ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

General criteria that clients operating in all business sectors need to meet in order to have a loan from Intesa Sanpaolo

(4.7.1.12) Requirements for clients/investees

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Other environmental commitment, please specify :the Bank undertakes not to finance companies and projects with high impact on biodiversity

Climate-specific commitments

☑ Commitment to not invest in fossil-fuel expansion

Social commitments

☑ Commitment to promote gender equality and women's empowerment

☑ Commitment to respect internationally recognized human rights

☑ Commitment to secure Free, Prior, and Informed Consent (FPIC) of indigenous people and local communities

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

☑ Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

☑ No timeframe

Investing (Asset manager)

(4.7.1.1) Environmental issues covered

☑ Climate change
☑ Water
☑ Biodiversity

(4.7.1.2) Type of policy

☑ Sustainable/Responsible Investment Policy
☑ Stewardship policy
☑ Active ownership policy
☑ Other investing policy, please specify :engagement policy

(4.7.1.3) Public availability

☑ Publicly available

(4.7.1.4) Attach the policy

Sustainability Policy Eurizon_Engagement Policy Eurizon.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

☑ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Eurizon outlines through its policies the procedures adopted in providing collective asset and portfolio management services and promotes engagement with investees, regardless of asset type. The Company is actively involved in national and international initiatives that promote the integration of sustainability principles in the financial sector, participates in work groups for the development of ESG-related best practices, training events and conferences. As a signatory of the Net Zero Asset Managers Initiative (NZAMI) it prioritizes climate risks, transition plans and transparency of GHG emissions by investee companies, particularly in the most polluting sectors. In November 2022, Eurizon published its Net Zero targets, approved by the BoD and identified a "Portfolio in Scope" to be managed toward climate neutrality by 2050, aiming to gradually include up to 100% of its assets. During 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context, which was completed with its relaunch and an updated framework. Following the relaunch, Eurizon confirmed its membership and, in line with the new Commitment Statement, updated certain commitments to reflect both the solidity of the process already undertaken and changes to the reference scenario. The Asset Level Alignment target is no longer a strategic priority, and although no external reporting is envisaged, Eurizon intends to maintain internal monitoring activities. For further details refer to Net Zero Progress Report 2025. Asset Level Alignment metric: % of AUM in 'Portfolio in scope' invested in companies belonging to material sectors that are 'Achieving Net Zero', 'Aligned to a Net Zero pathway' and 'Aligning towards a Net Zero pathway' by 2030 or 'Achieving Net Zero' and 'Aligned to a Net Zero pathway' by 2040. At the end of December 2025, the percentage of issuers classified into these buckets is 36.27% ('Aligning towards a Net Zero pathway' or 'Aligned to a Net Zero pathway'). The Eurizon's 'NatureWatch', an internal screening methodology introduced in 2024 (inspired by Kunming-Montreal Global Biodiversity Framework), identifies companies operating in/near biodiversity-sensitive areas with potential negative impacts, to prioritize engagement with those most at risk. Eurizon also assesses Principal Adverse Impact indicators across its AuM, covering environmental issues like GHG emissions, biodiversity, and water, with the related mitigation measures.

(4.7.1.12) Requirements for clients/investees

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Other environmental commitment, please specify :commitments aligned with Nature Action 100 requests (e.g.time-bound, context-specific goals to manage natural capital risks and opportunities and to publish annual progress against stated goals, the plan to achieve them and progress achieved).

Climate-specific commitments

☑ Commitment to net-zero emissions

☑ Commitment to disclose Scope 1 emissions

☑ Commitment to disclose Scope 2 emissions

☑ Commitment to develop a climate transition plan

☑ Commitment to not invest in fossil-fuel expansion

☑ Commitment to set a science-based emissions reduction target

Social commitments

☑ Commitment to respect internationally recognized human rights

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

☑ Yes

(4.7.1.14) % of clients/investees compliant with the policy

60

(4.7.1.15) % of portfolio value that is compliant with the policy

60

(4.7.1.16) Target year for 100% compliance

☑ In more than 5 years

Investing (Asset owner)

(4.7.1.1) Environmental issues covered

☑ Climate change

(4.7.1.2) Type of policy

☑ Investment policy/strategy

(4.7.1.3) Public availability

☑ Publicly available

(4.7.1.4) Attach the policy

Policy for the integration of ESG sustainability factors into the investment process.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

☑ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Within the Policy for the integration of ESG sustainability factors into the investment process (abstract publicly available), the Asset Owner confirmed its commitment to Net Zero targets: the Insurance Group joined the Net Zero Asset Owner Alliance (hereafter NZAOA) in December 2021. The Intesa Sanpaolo Assicurazioni Group published in October 2022 the first Intermediate Climate Targets for the investment portfolio to 2030. In particular, as part of the mitigation of the emissions of its investment portfolio, the Intesa Sanpaolo Assicurazioni Group, in line with the indications of the Intergovernmental Panel on Climate Change (IPCC), the 'Target Setting Protocol' (second edition) of the NZAOA and, using different climate scenarios including those defined by the 'One Earth Climate Model' (OECM) has committed to cutting the emissions of "Direct Investments" – for the listed equity and publicly Traded Corporate Bond asset classes. Details of these are available in the Intesa Sanpaolo 2025 Climate Report (p.183-184). The Sub-Portfolio targets refer to Listed Equity and Publicly Traded Corporate Bonds "Direct Investments"; the AuM covered by targets – as of 31 December 2021 – is equal to 22.2bn USD (19.6bn Euro) out of total Asset Owner division assets reported in question 1.10 (year 2025). Investees will need to meet the requirements selected in column 12, in order to reach the target, such as those in relation to Scope 1 and 2 and to the transition plans. The policy applies to the whole portfolio.

(4.7.1.12) Requirements for clients/investees

Climate-specific commitments
☑ Commitment to net-zero emissions
☑ Commitment to disclose Scope 1 emissions
☑ Commitment to set a science-based emissions reduction target

☑ Commitment to disclose Scope 2 emissions
☑ Commitment to develop a climate transition plan
☑ Commitment to not invest in fossil-fuel expansion

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

☑ Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

☑ No timeframe

Insurance (Insurance company)

(4.7.1.1) Environmental issues covered

☑ Climate change

(4.7.1.2) Type of policy

☑ Other insurance policy, please specify :Sustainability policy and product information prospectus

(4.7.1.3) Public availability

☑ Publicly available

(4.7.1.4) Attach the policy

Sustainability Policy of Intesa Sanpaolo Assicurazioni Group.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

☑ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Intesa Sanpaolo Assicurazioni Group Sustainability Policy outlines the Group's commitment in the area of protection products. In particular, among the various actions described, it highlights the promotion of virtuous behaviour by incentivising and rewarding customers who install preventive measures. These features are

detailed in the specific product information prospectus, specifying whether during the claim assessment process the presence of "Preventive Measures" (e.g., wind- and hail-resistant shutters or blinds or flood barriers and water suction systems) is verified, as they can help mitigate the extent of potential damage caused by weather or electrical events. If such measures are present, the deductible will be waived, or a reduction of the deductible from 15% to 10%. See documents "Appendix of Insurance Conditions of the XME Protection policy" available on the website in Italian only: 1)https://www.intesasanpaoloprotezione.com/documents/d/intesa-sanpaolo-protezione/isp-proprietario-coperturacasafabbricatoplus-cda-horus-pdf. Courtesy Translation in relation to insurance coverage for atmospheric phenomena on page 17: "The chosen level of deductibles does not apply if, on the date of the accident, the Customer or the Insured party had already installed preventive measures for weather events in his building: -For atmospheric events: wind- and hail-resistant shutters or blinds; -For electrical events: surge protector, protection device installed on the electrical panel for managing power surges." 2)https://www.intesasanpaoloprotezione.com/bin/openAssetInline?path=/content/dam/isp_protezione/documents/products/business/protezione-catastrofi-naturali-business/Ispp-Cat-Nat-CdA-012026.pdf. Courtesy Translation in relation to insurance coverage for atmospheric phenomena on page 13 "This excess is reduced to 10% if, following claims arising from floods, inundation, river overflow and water ingress, it is found that the Policyholder or the Insured has installed preventive measures such as flood barriers or flood-proof bulkheads to protect all vehicle access points to the building affected by the claim.

(4.7.1.12) Requirements for clients/investees

Climate-specific commitments

☑ Other climate-related commitment, please specify :Promoting virtuous behaviours, incentivizing and rewarding customers who install preventive measures.

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

☑ Yes

(4.7.1.14) % of clients/investees compliant with the policy

1

(4.7.1.15) % of portfolio value that is compliant with the policy

1

(4.7.1.16) Target year for 100% compliance

☑ No timeframe

(4.7.2) Provide details of your exclusion policies related to industries, activities and/or locations exposed or contributing to environmental risks.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

☑ All coal

(4.7.2.2) Fossil fuel value chain

☑ Upstream
☑ Downstream

(4.7.2.3) Year of exclusion implementation

2021

(4.7.2.4) Phaseout pathway

☑ New business/investment for new projects
☑ New business/investment for existing projects
☑ Existing business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2025

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

ISP's "Rules for lending operations in the Coal sector" were updated in July 2021, after being issued in March 2020. The policy applies at Group level and globally to the Group Banks and Companies, including international branches, which provide the financial products and services to the coal mining and to the electricity production from coal (“CFPP” - Coal-fired power plants) sectors. The Rules apply to the financial products and services provided by the Group, including the related advisory services. The Rules apply to all forms of financing, both to the so-called "general purpose" loans, i.e. with an unknown use of the disbursements made available, and to “defined use of proceeds” loans (such as project finance, project related corporate finance, acquisition finance). Coal mining: from the date of issue of these Rules, the Group will not increase its exposure relating to general purpose financial products and services towards companies belonging to the coal mining sector and will manage the current exposures in line with the phase-out. The Group will also not provide financial products and services to projects aimed at the construction or expansion of new coal mines (namely, "Greenfield Projects") or the purchase of companies operating in the coal mining sector. Coal-Fired Power Plants (CFPP): from the date of issue of these Rules, the Group will not increase its exposure relating to general purpose financial products and services towards companies having at least one of the following characteristics: operating in the electricity production from coal and that do not have a documented plan/strategy for the progressive reduction of greenhouse gas emissions; that do not document a forecast maximum limit of 35% of the installed capacity deriving from coal by 2030; that have plans to expand coal-fuelled installed capacity or are engaged in the construction of new coal-fired power plants. The Group will also manage the existing exposures in respect of the companies indicated above with a view to progressive disengagement. The Group will not provide financial products and services to projects aimed at the construction of new coal-fired power plants, the purchase or expansion of coal-fired power plants that are already in operation. The Group confirms the achievement in 2025 of the phase-out for its exposure to counterparties active in the coal mining sector, as per exclusion policy; a marginal amount remains, mainly attributable to a non-performing exposure.

Investing (Asset manager)

(4.7.2.1) Type of exclusion policy

☑ All coal

(4.7.2.2) Fossil fuel value chain

☑ Upstream
☑ Midstream
☑ Downstream

(4.7.2.3) Year of exclusion implementation

2021

(4.7.2.4) Phaseout pathway

☑ New business/investment for new projects
☑ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2050

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

Currently, Eurizon does not invest in companies exposed to significant negative externalities, as set out in its sustainability policies. Specifically, issuers with exposure to thermal coal above the thresholds set in the Sustainability Policy (at least 25% of their turnover from extraction or electricity production activities linked to thermal coal and 20% of turnover from thermal coal with expansion plans in place), are excluded/limited from investments. The exclusions are applied to all active management products, while in the case of Limited Tracking Error products and index-linked products (with the exception of those that specifically integrate ESG factors), the maximum direct investment allowed is equal to the weight of the issuer in the sustainable benchmark. Issuers below the identified thresholds are subject to specific engagement activities aiming to ensure that no new thermal coal generation or oil sands extraction projects are developed, and to verify the phase-out of such activities. If, at the end of the engagement process, no positive impact is found, such as the setting of "phase-out" plans from the thermal coal and oil sands extraction sectors, Eurizon will consider whether to extend the monitoring period or to initiate the divestment process. Going forward, and according to the commitment for being a signatory of the Net Zero Asset Managers Initiative, Eurizon will continue its efforts to monitor issuers belonging also to these sectors and, in line with its commitments to “Net Zero”, will support issuers' transition processes and consider to gradually reduce exposure where deemed relevant. 2050 is taken as a reference in line with the International Energy Agency's (IEA) Net Zero Emissions by 2050 (NZE) scenario that outlines a strict global pathway to limit warming to 1.5 °C.

Investing (Asset owner)

(4.7.2.1) Type of exclusion policy

☑ All coal

(4.7.2.2) Fossil fuel value chain

☑ Upstream
☑ Midstream
☑ Downstream

(4.7.2.3) Year of exclusion implementation

2021

(4.7.2.4) Phaseout pathway

☑ New business/investment for new projects

(4.7.2.5) Year of complete phaseout

2030

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

Currently, the Insurance Group does not invest in companies exposed to significant negative externalities, as set out in the sustainability policies. The Group has established a framework for implementing exclusions or restrictions within the Investment Universe of managed assets since the date of issuance of the policy in 2022. These measures apply to issuers operating in sectors considered 'not socially responsible,' including: - companies that derive at least 15% of their revenue from mining or electricity generation activities related to thermal coal. The Group recognizes the need to gradually phase out unabated coal-fired electricity generation, meaning coal use without Carbon Capture and Storage (CCS) technologies, in line with the 1.5C pathways recommended by the IPCC; - companies involved in new thermal coal projects, including coal-fired power plants, coal mines and related infrastructure, even if at the pre-construction stage. Going forward, the Insurance Group will continue its efforts to monitor issuers belonging also to this sector and, in line with its commitments to “Net Zero”, will support issuers' transition processes and consider to gradually reduce exposure where deemed relevant.

Insurance underwriting (Insurance company)

(4.7.2.1) Type of exclusion policy

☑ Thermal coal

(4.7.2.2) Fossil fuel value chain

☑ Upstream
☑ Midstream
☑ Downstream

(4.7.2.3) Year of exclusion implementation

2016

(4.7.2.4) Phaseout pathway

☑ Other, please specify :exclusions for standard SME products are based on the sector code (example NACE code). Accordingly, all companies belonging to that specific sector are excluded

(4.7.2.5) Year of complete phaseout

2016

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

In the Underwriting Guidelines for tailor-made Corporate and standard SME policies, the Insurance Group presents specific exclusions linked to: • risks excluded by Company guidelines •risks excluded from reinsurance treaties. The thermal coal sectors have been excluded for the Property and Liability business lines since 2016 on standard SME policies. Moreover, a specific internal Policy (the "Intesa Sanpaolo Protezione Underwriting Policy") has been defined to set exclusions for ESG purposes, which applies to the underwriting portfolio.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

☑ Other, please specify :Shale/tight Oil&Gas,Tar sands/Oil sands,Coal bed methane/coal seam gas,Oil&Gas in natural World Heritage sites,wetlands according to the Ramsar Convention,IUCN protected areas cat.I to VI,Arctic Region,Amazon Sacred Headwaters, etc.

(4.7.2.3) Year of exclusion implementation

2021

(4.7.2.4) Phaseout pathway

☑ New business/investment for new projects
☑ New business/investment for existing projects
☑ Existing business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2025

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

Intesa Sanpaolo's "Rules for lending operations in the Unconventional Oil & Gas sector" were updated in April 2024, after being issued in July 2021. These apply to all Group companies and in all countries in which they operate and refer to the Oil & Gas sector as a whole, and therefore to all its operating segments: up-stream, mid-stream, down-stream, trading. Specific limits and exclusions apply to activities with a greater impact from an environmental point of view, in particular in relation to "unconventional" resources. The Group also commits not to finance projects in the Oil & Gas sector involving new oil extraction sites, and projects in the Oil & Gas sector characterised by activities with negative environmental impacts in the "critical areas" of the planet such as: natural World Heritage sites (UNESCO), wetlands according to the Ramsar Convention, areas designated for the long-term conservation of nature, i.e. those classified by the IUCN, "International Union for Conservation of Nature", as category I to VI protected areas, the Arctic Region, Amazon Sacred Headwaters. The Group has identified specific exclusions and limitations in relation to unconventional resources. As regards these resources, the Group confirms the achievement of the phase-out objective in 2025.

Investing (Asset manager)

(4.7.2.1) Type of exclusion policy

☑ Oil from tar sands

(4.7.2.2) Fossil fuel value chain

☑ Upstream
☑ Midstream
☑ Downstream

(4.7.2.3) Year of exclusion implementation

2021

(4.7.2.4) Phaseout pathway

☑ New business/investment for new projects
☑ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2050

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

Currently, Eurizon does not invest in companies exposed to significant negative externalities, as set out in its sustainability policies. Specifically, issuers with exposure to oil sands sector above the thresholds set in the Sustainability Policy (those deriving at least 10% of their turnover from oil sands extraction), are excluded/limited from investments. The exclusions are applied to all active management products, while in the case of Limited Tracking Error products and index-linked products (with the exception of those that specifically integrate ESG factors), the maximum direct investment allowed is equal to the weight of the issuer in the sustainable benchmark. Issuers below the identified thresholds are subject to specific engagement activities aiming at verifying the phasing out from such activities. If, at the end of the engagement process, no positive impact is found, such as the setting of "phase-out" plans from the thermal coal and oil sands extraction sectors, Eurizon will consider whether to extend the monitoring period or to initiate the divestment process. Going forward, and according to the commitment for being a signatory of the Net Zero Asset Managers Initiative, Eurizon will continue its efforts to monitor issuers belonging also to this sector and, in line with its commitments to “Net Zero”, will support issuers' transition processes and consider to gradually reduce exposure where deemed relevant. 2050 is taken as a reference in line with the International Energy Agency's (IEA) Net Zero Emissions by 2050 (NZE) scenario that outlines a strict global pathway to limit warming to 1.5 °C.

(4.7.2.1) Type of exclusion policy

☑ Other, please specify :unconventional oil and gas sources, including oil sands, oil shale, shale gas, coal seam gas, and Arctic oil and gas production

(4.7.2.3) Year of exclusion implementation

2022

(4.7.2.4) Phaseout pathway

☑ New business/investment for new projects

(4.7.2.5) Year of complete phaseout

2030

(4.7.2.6) Country/area the exclusion policy applies to

☑ Worldwide

(4.7.2.7) Description

Currently, the Insurance Group does not invest in companies exposed to significant negative externalities, as set out in the sustainability policies. The insurance Group has established a framework for implementing exclusions within the Investment Universe of managed assets since the date of issuance of the policy in 2022. These measures apply to issuers operating in sectors considered 'not socially responsible,' including: companies deriving at least 10% of their revenues from unconventional oil and gas sources, including oil sands, oil shale, shale gas, coal seam gas, and Arctic oil and gas production. Going forward, the Insurance Group will continue its efforts to monitor issuers belonging also to this sectors and, in line with its commitments to “Net Zero”, will support issuers' transition processes and consider to gradually reduce exposure where deemed relevant.

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?

	Covenants included in financing agreements to reflect and enforce policies
	☑ Yes

(4.8.1) Provide details of the covenants included in your organization's financing agreements to reflect and enforce your environmental policies.

(4.8.1.1) Environmental issue

☑ Climate change
☑ Forests
☑ Water
☑ Biodiversity

(4.8.1.2) Types of covenants used

☑ A purpose or use of proceeds clause that refers to a taxonomy aligned activity
☑ Margin or pricing depends on sustainability criteria

(4.8.1.3) Asset class/product types covered by covenants

☑ Corporate loans
☑ Retail mortgages
☑ Project finance

(4.8.1.4) Criteria for how covenants are applied

☑ All business/investment for all projects

(4.8.1.5) % of clients covered by covenants

0.7

(4.8.1.6) % of portfolio covered in relation to total portfolio value

8.3

(4.8.1.7) Provide details on which environmental policies your covenants enforce and how

ISP offers a wide range of ESG financial products including solutions with environment-related covenants, among which: SUSTAINABILITY LINKED SOLUTIONS: In 2025, ISP supported corporate clients with solutions dedicated to companies that link their transactions to sustainability indicators and KPIs. Sustainability-linked solutions and solutions with dedicated use of proceeds linked to capital expenditures allow, in specific cases, access to the Bank's dedicated circular economy credit facility. Among these are Green loans which fully or partially finance/refinance new and/or existing eligible green projects, with significant environmental impact. Other solutions available to customers include Project Finance for the renewable energy sector. For solutions without use of proceeds, ISP's offer also includes credit lines, guarantee lines, or letters of credit that, through an incentive/penalisation mechanism, encourage companies to set and achieve their sustainability goals. S-LOAN, aims to support and finance SMEs sustainable growth projects, associating their economic and financial decisions with their environmental impacts and assisting them on the path to structural change. The customer defines annual objectives on 2 ESG KPIs chosen among those proposed by the Bank. If objectives are achieved, the customer benefits from a reduced interest rate for the following year. Within the S-loan offer, specific products provide for environmental KPIs, among which S-Loan ESG and S-Loan CER (Renewable Energy Community). In addition to the general purpose S-Loan lines, S-Loan Progetti Green is a MLT dedicated financing solution designed to support clearly identified business investments that can generate a positive environmental impact on processes, infrastructures, technologies, services and products. In 2025, ~€4.3bn of S-Loans (€11.1bn from 07/2020) were disbursed. RETAIL MORTGAGES: ISP offering includes Green Mutuo Domus, a preferential-rate (featuring a reduced fixed annual nominal interest rate and complimentary energy certification for renovation purposes). This product enables the purchase or construction of energy efficient residential properties, as well as the energy upgrading of residential properties in Italy. In 2025,

~€6.3bn of Green Mortgages (~€15.2bn from 2022) were disbursed. Columns "% of clients covered by covenants" and "% of portfolio covered in relation to total portfolio value" include Green mortgages, circular economy transactions and S-loans.

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

☑ Yes

(4.10.2) Collaborative framework or initiative

☑ UNEP FI
☑ UN Global Compact
☑ Equator Principles
☑ Climate Action 100+
☑ CDP Investor Signatory
☑ Science-Based Targets Initiative (SBTi)
☑ Principles for Responsible Investment (PRI)
☑ UNEP FI Principles for Responsible Banking
☑ UNEP FI Principles for Sustainable Insurance
☑ Institutional Investors Group on Climate Change (IIGCC)
☑ Net Zero Banking Alliance
☑ Net Zero Insurance Alliance
☑ Net Zero Asset Owner Alliance
☑ Net Zero Asset Managers initiative
☑ Paris Aligned Investment Initiative
☑ Task Force on Climate-related Financial Disclosures (TCFD)
☑ Other, please specify **:FIT; Nature Action 100**

(4.10.3) Describe your organization's role within each framework or initiative

Besides ad-hoc forums and initiatives, Intesa Sanpaolo participates in a number of climate and nature related initiatives and partnerships demonstrating the Group's adherence to the sector's collective effort to achieve Net-Zero and other environmental goals. The initiatives span a broad range of industries and topics including climate related issues. Among others, ISP has adhered to many initiatives either directly (CDP Investor Signatory, Equator Principles, Net Zero Banking Alliance, which reshaped its structure evolving from a voluntary membership alliance to a reference framework with the aim of continuing to provide guidelines to promote the transition in line with the Paris Agreement, Science-Based Targets Initiative (SBTi), UN Global Compact, UNEP FI, UNEP FI Principles for Responsible Banking, European Clean Hydrogen Alliance, Climate Investment Platform, Renewable and Low-Carbon Fuels Value Chain Industrial Alliance, etc…) or through its specialised

subsidiaries. For example, Eurizon and Fideuram, are, among others, CDP investor signatories, members of the Institutional Investors Group on Climate Change (IIGCC) and participants of Climate Action 100+. They have also adhered to the PRI and followed the Paris Aligned Investment Initiative "Net Zero Investment Framework 1.5°C" (NZIF). Fideuram Asset Management Ireland (FAMI) is also a signatory to the Global Investor Statement to Governments on the Climate Crisis. Following the relaunch of NZAMI, Eurizon Capital SGR and FAMI confirmed the membership to the initiative. Fideuram Asset Management SGR's membership ceased due to the end of its business activities, as the full demerger of Fideuram Asset Management SGR in favor of Fideuram - Intesa Sanpaolo Private Banking and Eurizon Capital SGR became effective on July 1st, 2025. Intesa Sanpaolo Assicurazioni has adhered to the UNEP FI PSI, NZAOA, the Forum for Insurance Transition to Net Zero (previously NZIA) and is a signatory to the Global Investor Statement to Governments on the Climate Crisis. Since July 2023, Intesa Sanpaolo and Intesa Sanpaolo Innovation Center have been participating in the UNEP FI task force on the Nexus between circular economy, climate and nature, aimed at orienting responsible banking principles towards circular economy, recognising how the latter can represent a strategic lever for the financial sector to achieve objectives of decarbonisation, restoration of biodiversity, reduction of pollution and support for local economies. Moreover, in 2025, ISP continued to take part in the UNEP FI working groups related to these topics, sharing its expertise in circular economy and natural capital protection to promote ecosystem preservation, resource efficiency, and systemic resilience. Throughout 2025, Intesa Sanpaolo continued its participation and co-chairing activity within the BAFT (Bankers Association for Finance and Trade) global working group on sustainability. The working group is in the process of finalising its Principles of Sustainable Finance, designed to sit alongside the International Chamber of Commerce (ICC) frameworks on sustainable trade finance, in line with the Sustainable Development Goals. In 2025, Intesa Sanpaolo adhered to the Principles for Sustainable Trade Finance developed by the International Chamber of Commerce (ICC) and actively participated in the related working tables to define the criteria for the classification of sustainable trade finance. Intesa Sanpaolo also confirmed its collaboration with the Ellen MacArthur Foundation, focusing on circular economy and supporting undertakings with the dissemination and funding of this model. The Group also signed the Statement from the Private Financial Sector to Member States negotiating the International Legally Binding Instrument (ILBI) to end plastic pollution, expressing its support for an ambitious global agreement to tackle plastic waste.

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Yes

☑ Yes, we engaged directly with policy makers

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

☑ Paris Agreement

(4.11.4) Attach commitment or position statement

2025_Climate_Report.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

☑ Yes, both my organization and the intermediary organization we engage through is registered

(4.11.6) Types of transparency register your organization is registered on

☑ Voluntary government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

Intesa Sanpaolo is registered in the EU transparency register and the ID number is 24037141789-48. In addition, the organisations ABI, EBF and AFME are also registered in the EU Transparency Register, and their respective ID numbers are: ABI: 915519211566-03; EBF: 4722660838-23; AFME: 65110063986-76.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Through its Chief Institutional Affairs and External Communication Officer (CIAECO), ISP monitors regulatory proposals at international, EU and national level (and, where appropriate, actively participating in related discussions through advocacy) for topics that may have a direct and indirect impact on the Group. The information collected by the structures within CIAECO is disseminated across the Group through seminars, regulatory alerts, newsletters and other tools, ensuring all positions expressed by the Group are consistent with the strategy. At EU level ISP, through the European Regulatory & Public Affairs (ERPA) function, provides inputs to EU institutions, directly and through EU trade associations, participating in EU consultations, trade associations' working groups and events on issues related to sustainability and climate change. ERPA coordinates activities related to responses to public relevant climate-related consultations, drafting of papers or amendment proposals, directly and through relevant professional associations. All these activities are reported internally to the organisation structures involved in the issues of climate change risks and opportunities and evaluated to verify the consistency with ISP strategy: every reply to public consultations on climate issues is coordinated by the CIAECO Area, with the contribution of relevant functions, and results in the definition of a final position. The Steering Committee, composed of the first organisational line, meets on a quarterly basis to examine climate change issues, including new regulations. Moreover, ERPA provides training for business units impacted by major EU legislative developments (CSRD/CSDDD Omnibus I Directive, SFDR review...). The Group collaborates on Sustainable Finance with leading EU trade associations (European Banking Federation, Association for Financial Markets in Europe,…) and with ABI within the Banks, environment and climate change and Sustainable Investments working groups, and contributes to EFRAG's ESRS review and the EU Taxonomy delegated acts consultation. ISP participates in a n. of climate related initiatives and partnerships(see Climate Report p.32)demonstrating the Group's adhesion to the sector's effort to achieve Net Zero and other environmental goals. In 2025, ISP continued its participation within the Bankers Association for Finance and Trade working group on sustainability. Attach commitment or position statement column: see p.68-69 Climate Report.

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Directive (EU) 2025/794 of the European Parliament and of the Council of 14 April 2025 […] as regards the dates from which Member States are to apply certain obligations relating to corporate sustainability reporting and corporate sustainability due diligence; Proposal for a Directive of the European Parliament and of the Council […] as regards certain obligations relating to corporate sustainability reporting and corporate sustainability due diligence (the so-called Omnibus I Package).

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Transparency and due diligence

☑ Transparency requirements

☑ Due diligence requirements

☑ Mandatory environmental reporting

(4.11.1.4) Geographic coverage of policy, law, or regulation

☑ Global

(4.11.1.6) Your organization’s position on the policy, law, or regulation

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

ISP welcomed the revision of the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD) proposed under the Omnibus I package as a valuable opportunity to streamline the EU sustainability framework. Intesa Sanpaolo’s engagement with policymakers was intended to support them in acknowledging potential implementation challenges within both Directives and in identifying pragmatic solutions that appropriately balance the benefits of sustainability reporting and due diligence requirements with the operational efforts required from financial institutions. Regarding the CSRD, ISP highlighted the reporting obligations applicable to subsidiaries, including listed ones, where sustainability information is already comprehensively reported at parent company level. The Group supported greater alignment aimed at avoiding unnecessary duplication of reporting processes while maintaining the availability and quality of sustainability information for stakeholders. In addition, ISP engaged with policy makers on the application of the value chain cap; it highlighted the need to ensure consistency between CSRD requirements and sector-specific financial legislation, so as to avoid situations where entities not subject to CSRD reporting could interpret the provisions as limiting the sharing of information that financial institutions require to comply with their own risk management and due diligence obligations under other EU regulatory frameworks. With regard to the CSDDD, some provisions remained particularly challenging for financial institutions. In

particular, the potential extension of the Directive's scope to downstream provision of financial services is seen by ISP as introducing additional and duplicative requirements. This could significantly affect not only the competitiveness of EU-based banks, but also the ability of companies to access financing. Furthermore, the legal obligation to "put into effect" a transition plan raised concern. Its interpretation is unclear, and compliance would depend heavily on external factors beyond the control of financial institutions (such as the effective transition of financial institutions' clients). Moreover, the way the provision is currently framed appears overly prescriptive, diverging from what a transition plan should ideally be: a strategic planning tool rather than a strict compliance exercise.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

☑ Ad-hoc meetings
☑ Responding to consultations
☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Following their publication in the Official Journal of the European Union, the revised Directives will have a direct impact on Intesa Sanpaolo's sustainability reporting framework and due diligence processes. Being a matter of regulatory compliance, early engagement with policy makers was essential, both to raise internal awareness within the Intesa Sanpaolo Group regarding the practical implications of the new requirements and to contribute to a regulatory framework that appropriately balances sustainability objectives with operational feasibility, taking into account the specificities of the financial sector. ISP evaluates the engagement as successful because the final texts of the Directives present notable improvements on several key issues raised by the Group compared to the initial proposals, more appropriately recognising the specificities of financial institutions.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

☑ Paris Agreement

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Revision of Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards, pursuant to Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, which amends Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Transparency and due diligence

☑ Mandatory environmental reporting

(4.11.1.4) Geographic coverage of policy, law, or regulation

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

☑ EU27

(4.11.1.6) Your organization’s position on the policy, law, or regulation

☑ Support with major exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

The Intesa Sanpaolo Group welcomed the revision of the ESRS Delegated Act as an important opportunity to enhance the usability of the EU sustainability reporting framework. The Group appreciated several improvements already reflected in the draft proposals published by EFRAG, including the simplification of the double materiality assessment process and the increased level of flexibility granted to preparers in the preparation of sustainability statements. At the same time, ISP highlighted a number of areas where further refinements could improve the practicality of the standards. Firstly, concerns were raised regarding the introduction of the fair presentation principle. The Group noted the absence of a clear definition of what fair presentation requires, objective criteria for assessing compliance and guidance on how the principle should be audited, which could lead to increased implementation efforts. ISP therefore supported a more clearly defined approach. Secondly, regarding financed emissions targets, ISP highlighted that financial institutions predominantly disclose emissions reduction targets using intensity-based metrics for high-impact sectors. The requirement to disclose financed emissions targets in absolute values may not always be operationally feasible. Absolute financed emissions are already reflected through Scope 3 greenhouse gas disclosures. The estimation of future absolute financed emissions targets would require a significant number of assumptions and could therefore result in information that is not sufficiently robust or decision-useful. The Group therefore advocated for greater flexibility for financial institutions, allowing them to disclose financed emissions targets using intensity-based metrics only. Finally, ISP expressed concerns regarding the disclosure requirements on anticipated financial effects. Given the high level of uncertainty and estimation involved, the Group considers that quantitative information in this area may not always provide meaningful insights for investors and may be subject to significant variability over time. ISP proposed either removing the requirement for quantitative disclosures on anticipated financial effects or limiting the disclosure to qualitative information.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

☑ Ad-hoc meetings

☑ Responding to consultations

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The revision of the ESRS Delegated Act is highly relevant to Intesa Sanpaolo's environmental commitments and sustainability strategy, as it will shape the future sustainability reporting framework through which the Group communicates its environmental performance and progress towards its sustainability goals. ISP assesses its engagement as partially successful. Several concerns raised by the Group have been reflected in the latest EFRAG draft standards, including, for example, greater flexibility for financial institutions regarding the disclosure of financed emissions reduction targets through intensity-based metrics. At the same time, the legislative process is still ongoing and the final standards remain subject to further revisions.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

☑ Paris Agreement

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Commission Delegated Regulation (EU) 2026/73 of 4 July 2025, amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of the information to be disclosed concerning environmentally sustainable activities, and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards the simplification of certain technical screening criteria for determining whether economic activities do not significantly harm environmental objectives.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Transparency and due diligence

☑ Mandatory environmental reporting

(4.11.1.4) Geographic coverage of policy, law, or regulation

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

☑ EU27

(4.11.1.6) Your organization's position on the policy, law, or regulation

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Intesa Sanpaolo welcomed the revision of the Taxonomy Climate, Environmental and Disclosure Delegated Acts as a valuable opportunity to simplify the framework and enhance its usability. At the same time, the Group highlighted a number of areas where further refinements could improve the effectiveness and operational feasibility of the framework for financial institutions. Firstly, regarding the Green Asset Ratio (GAR), ISP noted that, while the metric plays a key role in assessing banks' sustainability efforts, its methodology presented inefficiencies. In particular, inconsistencies between Taxonomy GAR and Pillar 3 GAR create operational burdens, while the lack of alignment between the numerator and denominator affects comparability. The Group therefore supported greater harmonisation between the two frameworks and a broader recognition of sustainable financing activities within the numerator. Secondly, ISP highlighted that the Do No Significant Harm (DNSH) criteria remain overly complex, creating significant challenges for financial institutions. The Group advocated for a substantial simplification of the requirements, including recognition of compliance where equivalent obligations are already embedded in national legislation and acceptance of third-party certifications as evidence of compliance. Finally, ISP raised concerns regarding post-origination controls for Taxonomy-aligned exposures. Uncertainty remains as to whether recurring verification is required throughout the life of a transaction. The Group supported an approach whereby Taxonomy alignment, once appropriately assessed at origination, should generally not require additional post-disbursement verification activities.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

☑ Ad-hoc meetings
☑ Responding to consultations
☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The revision of the Taxonomy Climate, Environmental and Disclosure Delegated Acts is highly relevant to Intesa Sanpaolo's environmental commitments and transition strategy, as the Taxonomy framework underpins the disclosure of sustainable financing activities, including key metrics such as the Green Asset Ratio (GAR). ISP assesses our engagement as partially successful, as a number of the concerns raised by the Group have been reflected in the regulatory review process. In particular, the adoption of the Delegated Act by the European Commission introducing important simplifications to GAR reporting requirements for financial institutions, already applicable from FY 2025 reporting, represents a positive development in line with the advocacy positions supported by the Group. At the same time, several issues remain under discussion and further refinements could still be considered in future reviews of the framework (e.g. post-origination controls).

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

☑ Paris Agreement

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Delegated Act establishing a general portfolio framework aimed at incentivising financial institutions to increase the expected volumes of energy performance–focused renovation, pursuant to Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables
☑ Energy efficiency requirements

(4.11.1.4) Geographic coverage of policy, law, or regulation

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

☑ EU27

(4.11.1.6) Your organization’s position on the policy, law, or regulation

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Intesa Sanpaolo has actively monitored and contributed to discussions on the initiative, highlighting its potential to support the decarbonisation of the building stock and facilitate investments in energy efficiency. In particular, ISP advocated to make the so called “Mortgage Portfolio Standards” as a voluntary element, as well as to adopt measures to strengthen public guarantee schemes in order to reduce credit risk and ensure financial institutions’ access to Energy Performance Certificate (EPC) data, thereby enabling the enhancement of mortgage portfolios with classifications consistent with the EU Taxonomy.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

☑ Ad-hoc meetings
☑ Responding to consultations
☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The new Energy Performance of Buildings Directive (EPBD) will certainly support the improvement of the energy efficiency of the new and old buildings, thus affecting positively their value and the achieving of environmental commitment. ISP assesses its engagement as partially successful. Several priorities supported by the Group were reflected in the Level 1 provisions of the revised EPBD, confirming the importance of financial institutions' role in financing the energy transition of the building stock. At the same time, the delegated act establishing the Mortgage Portfolio Framework is still being developed by the European Commission.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

☑ Paris Agreement

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Proposal for the revision of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Transparency and due diligence

☑ Other transparency and due diligence, please specify :this Regulation aims to improve the clarity and comparability of sustainability disclosures in financial market participants' investment policies and products

(4.11.1.4) Geographic coverage of policy, law, or regulation

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

☑ EU27

(4.11.1.6) Your organization’s position on the policy, law, or regulation

☑ Support with major exceptions

(4.11.1.7) Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Intesa Sanpaolo welcomed the review of the Sustainable Finance Disclosure Regulation (SFDR) as an important opportunity to further align the framework with market practices. The Group positively assessed the introduction of a new categorisation system for sustainable financial products and the proposed simplification of disclosure requirements. At the same time, ISP highlighted a few areas requiring further refinements. Firstly, greater alignment between the future SFDR sustainability categories and sustainable financial instruments distributed under MiFID but outside the scope of SFDR 2.0 would help financial intermediaries continue offering clients a broader range of sustainable investment solutions. Secondly, the Group supported the inclusion of general-purpose sovereign debt across all sustainability categories, avoiding unintended disincentives for investments in issuers with strong sustainability profiles that do not rely on use-of-proceeds labels. Finally, ISP advocated for the immediate application of the proposed disclosure simplifications upon entry into force of the revised Regulation, rather than only at the end of the transitional period, to allow market participants to benefit from reduced reporting burdens as early as possible.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

☑ Ad-hoc meetings

☑ Responding to consultations

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The review of the SFDR is highly relevant to Intesa Sanpaolo, as it directly affects the framework through which sustainable financial products are disclosed and offered to investors. ISP assesses its engagement as partially successful. A number of positions advocated by the Group during the preparatory stages preceding the publication of the European Commission’s legislative proposal have been reflected in the proposed framework, including the simplification of disclosure requirements and the introduction of a new categorisation system for sustainable financial products. At the same time, the proposal still contains elements of concern, notably the

lack of full alignment between the SFDR categories and the MiFID II framework, as well as the different treatment of sovereign debt across product categories. Furthermore, the legislative review process is still ongoing and the final outcome remains subject to negotiations and potential amendments.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

☑ Paris Agreement

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

(4.11.2.1) Type of indirect engagement

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :AFME (Association for Financial Markets in Europe)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

As far as ISP knows, the association has public positions on climate change on single regulatory files. ISP has been working with the trade association for many years and contributed to influence single positions. Association for Financial Markets in Europe (AFME) is a strong supporter of the EU's aim to be a world leader in driving the development of a more sustainable financial system, including via the implementation of its Sustainable Finance Action Plan. AFME's sustainable finance steering committee meets regularly to discuss, debate and develop strategies for increasing the role of environmental, social and governance (ESG) considerations in wholesale finance and ISP is an active member. Within this framework in 2025, ISP has contributed, inter alia, to the following publications through the participation to the dedicated working group on sustainable finance: drafting of the AFME Position paper "Understanding banks' disclosure of emissions reduction targets"; drafting of the AFME Position paper "AFME views on Sustainability Omnibus proposals"; drafting of the AFME Position paper "AFME and ISDA views on the review of the Sustainable Finance Disclosure Regulation (SFDR)"; drafting of the AFME Position paper "Sustainability Omnibus: Priorities for trilogues"; drafting of the AFME's statement, together with other associations, to the European Parliament on the Delegated Act amending the Taxonomy Disclosures, Climate and Environmental Delegated Acts; drafting of the AFME consultation's response "Taxonomy Delegated Acts – amendments to make reporting simpler and more cost-effective for companies"; drafting of the AFME consultation's response "EBA's Consultation on Guidelines on ESG scenario analysis"; drafting of the AFME consultation's response "EFRAG's Call for Input on the revision of the European Sustainability Reporting Standards (ESRS)"; drafting of the AFME consultation's response, together with other associations, on the simplification of administrative burden in environmental legislation; drafting of the AFME consultation's response "EFRAG's Consultation on revised ESRS Exposure Drafts"; drafting of the AFME consultation's response "European Commission's Calls for Evidence for the review of the EU

Taxonomy Climate and Environmental Delegated Acts". ISP directly takes part to specific working groups in order to draft the association position, during these meetings ISP is a proactive member and helps to identify the most actionable solution.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

799999

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The amount refers to all membership fees paid to industry associations and organisations whose activities fall within the scope of the European Transparency Register. It represents Intesa Sanpaolo's total yearly expenditure (within the range €700,000 - €799,999) for lobbying, advocacy and other engagements with European Union institutions to shape policy and regulatory outcomes. The amount aggregates both direct and indirect costs, including personnel expenses, consultancy fees, administrative outlays and any other resources devoted to complying with EU transparency obligations. A breakdown by individual association cannot be provided due to confidentiality agreements (NDAs), but the total includes contribution to AFME - Association for Financial Markets in Europe, ABI - Italian Banking Association, CEPS - Center for European Political Studies, ECBC - European Covered Bond Council, AECA - The American European Community Association, EPFSF - European Parliamentary Financial Services Forum, APRE – Agenzia per la Promozione della Ricerca Europea, GII - Gruppo di Iniziativa Italiana.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

☑ Paris Agreement

(4.11.2.1) Type of indirect engagement

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :European Banking Federation (EBF) through ABI (Italian Banking Association)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

As far as ISP knows, the association has public positions on climate change on single regulatory files. ISP has been working with the trade association for many years and contributed to influence single positions. European Banking Federation (EBF) during 2025 has continued to work on sustainable finance through its dedicated working group (and sub-working groups) on sustainable finance which replied to public consultations, produced position papers, proposed amendments and organised meetings. Within this framework in 2025 ISP has contributed, inter alia, to the following publications through the participation to the dedicated working group on sustainable finance: drafting of the EBF's letter to the Commission, EBA and ECB on the comprehensive review of ESG-related financial sector regulation; drafting of the EBF's letter, together with other associations, to EFRAG on the ESRS Set 1 simplification exercise; drafting of the EBF's position paper "Proposal for the phased in approach to the EBA ESG Risk Management Guidelines"; drafting of the EBF's position paper "Revised EBF positioning on data and transition plans aspects of the Omnibus proposal"; drafting of the EBF's letter, together with other associations, to the Commission on the finalisation of the Taxonomy Delegated

Acts; drafting of the EBF's report "Report to Increase Bankability of Clean Industrial Deal and Green Transition"; drafting of the EBF's consultation response "Green bonds and sustainability-linked bonds – templates for voluntary post-issuance disclosures"; drafting of the EBF's consultation response "EBA's Consultation on Guidelines on ESG scenario analysis"; drafting of the EBF's consultation response "Call for evidence for an impact assessment" on the revision of SFDR; drafting of the EBF's consultation response "EBA's Consultation on ITS on amended disclosure requirements for ESG risks, equity exposures and aggregate exposure to shadow banking entities"; drafting of the EBF's consultation response on the Circular Economy Act; drafting of the EBF's consultation response "European Commission's Calls for Evidence for the review of the EU Taxonomy Climate and Environmental Delegated Acts"; drafting of the EBF's consultation response "how to increase lending for energy renovations of buildings". ISP directly takes part to specific working groups in order to draft the association position, during these meetings ISP is a proactive member and helps to identify the most actionable solution.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

☑ Paris Agreement

(4.11.2.1) Type of indirect engagement

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :ABI (Associazione Bancaria Italiana - Italian Banking Association)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

In 2025 ABI has continued to support its members along this pathway, to facilitate discussions with European and Italian institutions, with the other employers' associations and with the consumers' associations. Intesa Sanpaolo has provided ABI with technical advice collaborating in dedicated working groups, strengthening their knowledge about the challenges facing the banking sector. In 2025, Intesa Sanpaolo worked together with ABI to participate to the European Energy Efficiency Financing Coalition, the initiative launched by the European Commission that aims to create a favourable market environment for energy efficiency investments. In this context, the Group participated in the working group on establishing a mortgage portfolio framework for voluntary use by financial institutions to be established by the European Commission.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

799999

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The amount refers to all membership fees paid to industry associations and organisations whose activities fall within the scope of the European Transparency Register. It represents Intesa Sanpaolo's total yearly expenditure (within the range €700,000 - €799,999) for lobbying, advocacy and other engagements with European Union institutions to shape policy and regulatory outcomes. The amount aggregates both direct and indirect costs, including personnel expenses, consultancy fees, administrative outlays and any other resources devoted to complying with EU transparency obligations. A breakdown by individual association cannot be provided due to confidentiality agreements (NDAs), but the total includes contribution to AFME - Association for Financial Markets in Europe, ABI - Italian Banking Association, CEPS - Center for European Political Studies, ECBC - European Covered Bond Council, AECA - The American European Community Association, EPFSF - European Parliamentary Financial Services Forum, APRE – Agenzia per la Promozione della Ricerca Europea, GII - Gruppo di Iniziativa Italiana.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

☑ Paris Agreement

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

(4.12.1.1) Publication

☑ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

☑ TCFD

(4.12.1.4) Environmental issues covered in publication

☑ Climate change
☑ Water
☑ Biodiversity

(4.12.1.5) Status of the publication

☑ Complete

(4.12.1.6) Content elements

☑ Strategy
☑ Governance
☑ Risks & Opportunities
☑ Value chain engagement
☑ Public policy engagement
☑ Climate-related targets
☑ Water accounting figures
☑ Greenhouse gas emissions figures
☑ Content of environmental policies
☑ Other, please specify **:- Own operation indicators - Target Setting on lending activities: Annual Reporting of estimated emissions - Sectoral Transition Plan - Asset Management Division and Asset Owner Division metrics and targets - Auditor's Report**

(4.12.1.7) Page/section reference

Content of environmental policies (p.26-28); Governance (p.9-24); Public policy engagement (p.67-69); Risks & opportunities (p.34-38, 71-101); Strategy (p.25-70); GHG emissions & climate-related targets (p.102-142); Own operation indicators, including water accounting figures (p.105-120); Target Setting on lending activities: Annual Reporting of estimated emissions (p.121-142); Sectoral Transition Plan (p.143-170); AM&AO Divisions metrics and targets (p.175-185); Auditor's Report (p.186-188).

(4.12.1.8) Attach the relevant publication

2025_Climate_Report.pdf

(4.12.1.9) Comment

2025 Climate Report. Intesa Sanpaolo publishes its fifth Climate Report, in continuity with the 2021 and 2022 editions of the Intesa Sanpaolo's TCFD Report and 2023 and 2024 Climate Report. The Report confirms the significant progress done by Intesa Sanpaolo on the path towards its Net Zero goals. The ISP Group completed the definition of 2030 decarbonisation targets for the highest-emitting sectors (in total 10 sectors), as indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI, and most relevant for the Group. On 27 January 2025, the Group received the validation by SBTi of targets for the reduction of own emissions and of the Group's financed emissions (Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets). The Report also includes references to Intesa Sanpaolo's approach to wider nature-related issues. The 2025 Climate Report was approved by the Board of Directors. The disclosure "Own operations indicators" and "Target setting on lending activities: annual reporting of estimated emissions" reported in the section "Metrics and Targets" is subject to limited assurance in accordance with "ISAE 3000 revised" available in the Independent Auditors' Report attached to this Climate disclosure.

(4.12.1.1) Publication

☑ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

☑ ESRS

(4.12.1.4) Environmental issues covered in publication

☑ Climate change
☑ Water
☑ Biodiversity

(4.12.1.5) Status of the publication

☑ Complete

(4.12.1.6) Content elements

☑ Strategy
☑ Governance
☑ Public policy engagement
☑ Climate-related targets

☑ Risks & Opportunities
☑ Value chain engagement
☑ Dependencies & Impacts
☑ Greenhouse gas emissions figures
☑ Content of environmental policies
☑ Other, please specify
: - Own operation indicators - Own emissions reduction plans - Metrics applied, baseline and 2030 sectoral decarbonisation targets -Targets on sustainable investment products - Auditor's Report

(4.12.1.7) Page/section reference

Content of environmental policies p.185-187,217-220; Strategy p.154-156,185-202;Governance p.173-181,184; Public policy engagement p.313-316; Dependencies&Impacts p.159-173; Risks&opportunities p.159-173,189-190,621-629; Value chain engagement p.161-163,317-319; GHG emissions&climate-related targets p.201,207,211; Own operation indicators p.207; Target Setting p.191-201; Own emissions reduction plans p.185-187; Targets on sustainable investment products p.298-299; Auditor's Report p.805-810.

(4.12.1.8) Attach the relevant publication

2025_Annual_Report.pdf

(4.12.1.9) Comment

The 2025 Consolidated Sustainability Statement (the “Statement”) has been prepared on a consolidated basis pursuant to Legislative Decree no.125 of 6 September 2024 which implements Directive 2022/2464/EU on corporate sustainability reporting in national law, and in accordance with the European Sustainability Reporting Standards (the “ESRS”), referred to in Delegated Regulation (EU) 2023/2772. The Manager responsible for preparing the Company’s financial reports, in collaboration with the Managing Director and CEO, certifies, with a specific report, that the Sustainability Statement included in the Report on operations has been prepared: in accordance with the above-mentioned reporting standards and Legislative Decree no. 125/2024; the specifications adopted pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation). The Sustainability Statement is subject to a limited assurance engagement by the independent auditors, which also carry out the statutory audit of the financial statements. In their report, the independent auditors express their conclusion as to the compliance with: the reporting standards adopted by the European Commission in accordance with Directive (EU) 2013/34/EU (European Sustainability Reporting Standards); Article 8 of Reg. (EU) No. 852 of 18 June 2020 (hereinafter also referred to as the “Taxonomy Regulation”) of the information contained in the section “Reporting pursuant to the EU Taxonomy (Regulation (EU) 2020/852)” of the Statement.

(4.12.1.1) Publication

☑ In other regulatory filings

(4.12.1.2) Is your publication in line with a standard or framework?

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

☑ Other, please specify :Pillar 3

(4.12.1.4) Environmental issues covered in publication

☑ Climate change

(4.12.1.5) Status of the publication

☑ Complete

(4.12.1.6) Content elements

☑ Governance
☑ Risks & Opportunities
☑ Strategy
☑ Greenhouse gas emissions figures
☑ Other, please specify :other metrics/targets

(4.12.1.7) Page/section reference

Basel 3 Pillar 3 Disclosure as of 31 December 2025. Some parts of the document are directly connected to climate change, among them: - Qualitative information on environmental risk - Table 1 Reg. 2024/3172 (pp. 287-309) - Quantitative templates (pp. 321-332): (Template 1 Reg. 2024/3172) (Template 2 Reg. 2024/3172) (Template 3 Reg. 2024/3172) (Template 4 Reg. 2024/3172) (Template 5 Reg. 2024/3172).

(4.12.1.8) Attach the relevant publication

Pillar3_31122025.pdf

(4.12.1.9) Comment

In line with the previous year in 2025, Intesa Sanpaolo included in the Pillar 3 disclosure the ESG risk information according to a CRR (art. 449a). In addition to quantitative disclosure, the environmental qualitative table includes environmental and climate risks within Intesa Sanpaolo business strategy and processes, governance and risk management.

(4.12.1.1) Publication

☑ In voluntary communications

(4.12.1.2) Is your publication in line with a standard or framework?

☑ No

(4.12.1.4) Environmental issues covered in publication

☑ Climate change
☑ Biodiversity

(4.12.1.5) Status of the publication

☑ Complete

(4.12.1.6) Content elements

☑ Strategy
☑ Value chain engagement
☑ Public policy engagement

☑ Climate-related targets
☑ Water accounting figures

☑ Greenhouse gas emissions figures
☑ Content of environmental policies
☑ Other, please specify **:- Own operation indicators; Sustainable investment products; Auditor's Report (EY).**

(4.12.1.7) Page/section reference

Content of environmental policies (p.66, 108-110); Public policy engagement (p.118-122); Strategy (p.58-67); Value Chain Engagement (p.45-46, 58-59, 88-91); GHG emissions & climate-related targets (p.60-61, 157); Water accounting figures (p.67, 158); Own operation indicators (p.60-61, 157-159); Sustainable investment products (p.82-88); Auditor's Report (p.169-171).

(4.12.1.8) Attach the relevant publication

SDGs_Report_2025.pdf

(4.12.1.9) Comment

2025 SDGs Report. Starting from 2024, Intesa Sanpaolo began publishing a voluntary stand-alone sustainability document, the SDGs Report, reaffirming its strong commitment to ESG issues. The Report outlines the Group's targets, actions, initiatives and results that support the achievement of the United Nations 2030 Agenda and is intended to inform all stakeholders about its contribution to the Sustainable Development Goals (SDGs). Intesa Sanpaolo has identified the SDGs where it can make the most meaningful impact, including those addressing climate action and responsible resource use (SDGs 7, 12 and 13). The ESG and sustainability objectives defined in the 2022–2025 Business Plan are closely aligned with these goals. Through its lending and investment activities, the Group actively supports the transition to a low-carbon and circular economy. The 2025 Report also confirms the significant progress made towards the Group's decarbonisation targets. It was approved by the Board of Directors and has undergone limited assurance.

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

☑ Yes

(5.1.2) Frequency of analysis

☑ More than once a year

Forests

(5.1.1) Use of scenario analysis

☑ Yes

(5.1.2) Frequency of analysis

☑ More than once a year

Water

(5.1.1) Use of scenario analysis

☑ Yes

(5.1.2) Frequency of analysis

☑ More than once a year

(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios
☑ NGFS scenarios framework, please specify :Disorderly transition, Orderly transition, Hot house world, Too little too late

(5.1.1.3) Approach to scenario

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

☑ Policy
☑ Market
☑ Reputation
☑ Technology
☑ Acute physical
☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

☑ 1.5°C or lower

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

☑ 2025
☑ 2030
☑ 2040
☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Changes to the state of nature
☑ Number of ecosystems impacted
☑ Changes in ecosystem services provision
☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital
☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands
☑ Consumer sentiment
☑ Consumer attention to impact
☑ Impact of nature footprint on reputation
☑ Impact of nature service delivery on consumer
☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes
☑ Global regulation
☑ Political impact of science (from galvanizing to paralyzing)
☑ Global targets
☑ Methodologies and expectations for science-based targets

Relevant technology and science
☑ Granularity of available data (from aggregated to local)

Direct interaction with climate
☑ On asset values, on the corporate
☑ Perception of efficacy of climate regime

Macro and microeconomy
☑ Domestic growth
☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

ISP in 2025 used several scenarios in its scenario analysis, Business Environment Scan (BES), stress test exercises and Pillar 3. For the banking portfolio, as per best international practices, the Network for Greening the Financial System (NGFS) Phase 5 scenarios have been considered within the scenario analysis and stress test. For 2025, the following four paths were chosen, providing insights on the effects of both physical and transition climate events: Orderly transition (Net Zero 2050); Disorderly transition (Delayed Transition); Hot House World (Current Policies); Too little too late (Fragmented World). The NGFS scenarios considered cover both above and below 2C scenarios. In this row ISP describes the NGFS scenario – orderly transition (1.5C) used for the ICAAP exercise. Major assumptions: all NGFS scenarios are analysed in dedicated simulations, where the granularity level is natively the subject of in-depth estimations. Analyses are carried out at the individual counterparty/asset level without simplified approaches to be subsequently enriched with targeted interventions aimed at increasing accuracy in terms of granularity and time horizons. In line with similar methodologies, the simulation module included capital expenditure logic to constrain unrealistic growth profiles. The growth profile was derived from sector demand projections and annual growth changes from the ability to issue new debt to fund expansion. Orderly transition scenarios, as declared in the NGFS technical documentation, is within the low temperature scenario (Representative Concentration Pathway RCP 2.6), while the Disorderly and the Fragmented World scenarios are close to an intermediate scenario (RCP 4.5), and the Current policies scenario to the high temperature scenario (RCP 6.0) by the end of the century. These scenarios have been used coherently in the Credit Risk and Market Risk scenario analysis exercise. The Liquidity Risk scenario analysis leveraged on the outcomes of the Credit Risk scenario analysis to integrate part of the effects on Credit Risk exposures on the regulatory liquidity indicators (Liquidity Coverage Ratio, Net Stable Funding Ratio). Moreover, concerning the NZ target setting, ISP has also defined 2030 interim targets also based on Reference scenario: IEA Net-Zero 2050. Also, the Asset management and Insurance divisions in 2025 used scenario analysis in their risk management systems.

(5.1.1.11) Rationale for choice of scenario

NGFS framework was chosen as reference of climate scenario analysis exercises due to the fact that it is the common framework used by the European finance industry as well as the selected methodology used by the European supervisor for climate stress tests.

Forests

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) SSPs used in conjunction with scenario

☑ SSP1

(5.1.1.3) Approach to scenario

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes in ecosystem services provision

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis evaluates, for each counterparty, a dependency coefficient associated with the geolocation and sector of activity of the Non-Financial Corporate (NFC) in question, based on the specific risk drivers considered, such as Crop Provisioning and Timber Provisioning.

(5.1.1.11) Rationale for choice of scenario

Contrary to what happens for climate change, environmental risk analysis, specifically as concerns forestry, lacks specific scenarios (or scenarios linked to climate change) and shared methodologies. This limitation has been overcome through the development of robust, science-based methodologies that enable the definition of a narrative consistent with the objectives of quantifying the effects on "traditional" banking risks.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) SSPs used in conjunction with scenario

☑ SSP1

(5.1.1.3) Approach to scenario

☑ Quantitative

(5.1.1.4) Scenario coverage

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes in ecosystem services provision

Finance and insurance

☑ Other finance and insurance driving forces, please specify :Sensitivity of production

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis considers the change in a "water stress" indicator between 2050 and current levels (T0) under two different scenarios, equivalent to SSP1 RCP2.6 (optimistic) and SSP5 RCP8.5 (pessimistic). The effect of the idiosyncratic shock to the counterparty's Probability of Default (PD) is estimated.

(5.1.1.11) Rationale for choice of scenario

Contrary to what happens for climate change, environmental risk analysis, specifically as concerns water, lacks specific scenarios (or scenarios linked to climate change) and shared methodologies. This limitation has been overcome through the development of robust, science-based methodologies that enable the definition of a narrative consistent with the objectives of quantifying the effects on "traditional" banking risks.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 6.0

(5.1.1.2) SSPs used in conjunction with scenario

☑ SSP2

(5.1.1.3) Approach to scenario

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

☑ Policy

☑ Market

☑ Chronic physical

☑ Reputation
☑ Technology
☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

☑ 3.0ºC - 3.4ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

☑ 2025
☑ 2030
☑ 2040
☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Changes to the state of nature
☑ Number of ecosystems impacted
☑ Changes in ecosystem services provision
☑ Speed of change (to state of nature and/or ecosystem services)
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital
☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment

☑ Consumer attention to impact

☑ Impact of nature footprint on reputation

☑ Impact of nature service delivery on consumer

☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation

☑ Political impact of science (from galvanizing to paralyzing)

☑ Global targets

☑ Methodologies and expectations for science-based targets

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

ISP in 2025 used several scenarios in its scenario analysis, Business Environment Scan (BES), stress test exercises and Pillar 3. For the banking portfolio, as per best international practices, the Network for Greening the Financial System ("NGFS") Phase 5 scenarios have been taken into consideration within the scenario analysis and stress test. More specifically, for 2025, the following four paths were chosen, providing different insights on the effects of both physical and transition climate events: Orderly transition ("Net Zero 2050"); Disorderly transition ("Delayed Transition"); Hot House World ("Current Policies"); Too little too late ("Fragmented World"). The NGFS scenarios considered cover both above 2C and below 2C scenarios. Orderly transition scenarios, as declared within the NGFS technical documentation, is within the range of the low temperature scenario (Representative Concentration Pathway RCP 2.6), whereas the Disorderly and the Fragmented

World scenarios are close to an intermediate scenario (RCP 4.5), and the Current policies scenario to the high temperature scenario (RCP 6.0) by the end of the century. Major assumptions: For physical risk, the current methodology leverages on a wide set of public and proprietary data (e.g., Copernicus, NASA, ISPRA, etc.) as well as counterparty and property information. The analyses conducted highlight that climate change risk management still suffers from lack of data/standardised data. All these scenarios have been used coherently both within the Credit Risk and Market Risk scenario analysis exercise. The Liquidity Risk scenario analysis has leveraged on the outcomes of the Credit Risk scenario analysis in order to integrate part of the effects on Credit Risk exposures on the regulatory liquidity indicators (Liquidity Coverage Ratio, Net Stable Funding Ratio). Also, the Asset management and Insurance divisions in 2025 used scenario analysis in their risk management systems.

(5.1.1.11) Rationale for choice of scenario

NGFS framework (based on RCP physical risk scenarios) was chosen as reference of climate scenario analysis exercises due to the fact that it is the common framework used by the European finance industry as well as the selected methodology used by the European supervisor for climate stress tests.

Water

(5.1.1.1) Scenario used

Water scenarios

☑ WRI Aqueduct

(5.1.1.3) Approach to scenario

☑ Quantitative

(5.1.1.4) Scenario coverage

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

☑ Acute physical

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes in ecosystem services provision

Finance and insurance

☑ Other finance and insurance driving forces, please specify :impact on balance sheet

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis considers the change in a "water stress" indicator between 2050 and current levels (T0) under two different scenarios, equivalent to SSP1 RCP2.6 (optimistic) and SSP5 RCP8.5 (pessimistic). The effect of the idiosyncratic shock to the counterparty's Probability of Default (PD) is estimated.

(5.1.1.11) Rationale for choice of scenario

Contrary to what happens for climate change, environmental risk analysis, specifically as concerns water, lacks specific scenarios (or scenarios linked to climate change) and shared methodologies. This limitation has been overcome through the development of robust, science-based methodologies that enable the definition of a narrative consistent with the objectives of quantifying the effects on "traditional" banking risks.

(5.1.2) Provide details of the outcomes of your organization’s scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

☑ Risk and opportunities identification, assessment and management
☑ Strategy and financial planning
☑ Resilience of business model and strategy
☑ Capacity building
☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

☑ Portfolio

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Scenario analysis exercises conducted in the year 2025 influenced various business processes, including the Banking portfolio: 1)Risk and opportunities identification, assessment and management: resulting insights from the climate stress test analysis and related quantification of financed emissions performed at borrower level have been used to identify and/or strengthen specific limits within the Risk Appetite Framework in relation to the business sectors most affected by transition risk and covered by emissions reduction target, as addressed in point 5). Specific actions have been defined in case of triggering the defined thresholds. Moreover, for the monitoring of physical risk within the Residential Real Estate and Non-Financial Corporate portfolios specific thresholds have been established for exposures secured by, respectively, residential and commercial properties located in high-risk areas. 2)Strategy and financial planning: the Group credit strategy is informed by color coding which derives both from risk classification enhanced by scenario analysis and from the identification of opportunities. 3)Resilience of business model and strategy: Resilience of business model is based on scenario analysis projections and these results are the base on which the risk appetite framework builds the portfolio concentration limits and mandatory CO2 reduction trajectories. 4)Capacity building: scenario analysis increased the awareness of the portfolio exposure to climate risks. Even in 2025 different initiatives have been organised in terms of dissemination of climate risk culture and the number of specialists engaged to manage these issues increased. 5)Target setting and transition planning: with reference to financed emissions from lending activities, decarbonisation targets have been set for Oil&Gas, Power Generation, Automotive, Iron & Steel, Aluminium, Cement, Commercial and Residential Real Estate, Coal mining and Agriculture – Primary Farming. Sectors covered by target setting accounted at end of 2025 for over 73% of the financed emissions of the highest-emitting sectors indicated in the ‘Guidelines for Climate Target Setting for Banks’ issued by UNEP FI. Targets are supported by actions identified and summarised in a Sectoral Transition Plan, published in the 2025 Climate Report. Results for 2025 show a decrease in absolute financed emissions by 12% compared to 2024 data for

sectors covered by target setting. Finally, the Group fulfilled the commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation from SBTi on 27th January 2025.

Forests

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

☑ Risk and opportunities identification, assessment and management
☑ Resilience of business model and strategy

(5.1.2.2) Coverage of analysis

☑ Portfolio

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

The analysis (performed for the Sustainability Statement) indicated that the Group's portfolio shows a material concentration of exposures to counterparties belonging to sectors that depend on ecosystem services and to industries that have a potentially negative impact on specific issues such as the intensive use of natural resources and other aspects that affect biodiversity loss.

Water

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

☑ Risk and opportunities identification, assessment and management
☑ Resilience of business model and strategy

(5.1.2.2) Coverage of analysis

☑ Portfolio

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Resilience of business model and strategy: The materiality assessment (performed for the Sustainability Statement) was informed by the scenario analysis results. These indicated that the Group's portfolio does not show a material concentration of exposures to water-related risks.

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

☑ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

☑ Yes

(5.2.7) Transition plan includes a managed phaseout plan which finances or enables an accelerated phaseout of high emitting physical assets

☑ Yes

(5.2.8) Key milestones and actions of your organization's managed phaseout plan

In 2022, Intesa Sanpaolo introduced its first High-Level Transition Plan, establishing the architecture and overarching framework for its climate transition strategy. This plan laid the foundation for a structured approach that has since been developed and implemented. In 2023, the High-Level Transition Plan evolved further, with the creation of the Sectoral Transition Plan (STP), which defines high-level actions for each sector to support the achievement of the Bank's 2030 emissions reduction targets, within the broader context of the Paris Agreement's objectives and the Group's commitment to achieve Net Zero emissions by 2050. The STP is organised into three sections for each sector: 1) assessment of each sector's readiness for transition (key challenges, enablers, and technology trends that create opportunities for decarbonisation); 2) review of the Group's progress against climate targets, highlighting gaps and priorities for acceleration with supporting data; 3) set out sector-specific implementation strategies and actions, showing how policies, client engagement, and financing mechanisms drive impact. Finally, where applicable, case studies from 2025 illustrate real transactions and innovative financing solutions. Furthermore, the Group identifies the support for companies with transition plans aligned with Net Zero objectives as one of the levers to achieve sectoral emission reduction targets and accompany clients along their pathway towards

decarbonisation. The Group has also defined policies that established criteria for the limitation and the exclusion of operations in sensitive sectors (Coal and Oil&Gas). Key milestones are defined and monitored within the Sectoral Transition Plan, reported in the 2025 Climate Report. For each sector, the Report describes progress against climate targets and outlines the related implementation strategies and actions, showing how policies, client engagement, and financing mechanisms drive impact. Moreover, in 2025 the Group confirms the achievement in 2025 of the phase-out for its exposure to counterparties active in the coal mining sector, as per exclusion policy; a marginal amount remains, mainly attributable to a non-performing exposure. Limitations and restrictions are also set to operations in the Oil & Gas sector: as regards 'unconventional' resources, the Group confirms the achievement of the phase-out objective in 2025.

(5.2.10) Mechanism by which feedback is collected from shareholders on your climate transition plan

☑ We have a different feedback mechanism in place

(5.2.11) Description of feedback mechanism

Intesa Sanpaolo published a 2022-2025 Business Plan which included ISP's first interim emissions reduction targets for financed emissions, approved by the Board of Directors. The 2022-2025 Business Plan was presented to all shareholders and to the market in February 2022. In 2022, Intesa Sanpaolo drew up its first High-Level Transition Plan for lending and investment activities, taking into consideration shareholder feedback on many aspects of the transition also in relation to target setting. This was then subject to a progressive refinement that led in 2023 to the definition of the Sectoral Transition Plan. The first four targets for the Oil&Gas, Power Generation, Automotive and Coal Mining sectors were published in the 2022-2025 Business Plan. In 2023, emission reduction targets were also set for the Iron&Steel and Commercial Real Estate sectors, and lastly in 2024 targets were introduced for Cement, Aluminium, Residential Real Estate and Agriculture - Primary Farming sectors. Targets and Sectoral Transition Plan were reviewed by the ESG Control Room and the Steering Committee and then approved by the BoD, with the support of the Risks and Sustainability Committee, as part of the 2025 Climate Report. The 2025 Climate Report provides full information on wider Climate-related Governance, Strategy, Risk Management and Metrics and Targets, and represents the framework within which the Transition Plan is embedded. All climate-related documents and information are also available on the Bank's corporate website and contacts are listed to allow shareholder feedback and requests (questions or meeting requests). Intesa Sanpaolo also constantly engages with the investor community and other stakeholders as provided for in the "listening and dialogue" approach contained in its Code of Ethics. Furthermore, all documents (Annual Report, Climate Report including Transition Plan, RBPS, etc.) are published well before the AGM to allow shareholders the time to read and pose questions on all topics contained in this mainstream reporting. Moreover, ISP has adopted the "Policy for the Management of Dialogue with Investors", which defines the principles governing the dialogue between the Board of Directors and investors and identifies "ESG strategies and policies, including the model in respect of social and cultural responsibility and combating climate change" among the topics that may be subject to dialogue with investors.

(5.2.12) Frequency of feedback collection

☑ More frequently than annually

(5.2.13) Description of key assumptions and dependencies on which the transition plan relies

The key assumptions used in developing the Transition plan were the following: - analysis of market trends and developments (including regulatory and technological) characterising each of the different sectors covered by target setting; - possible challenges to the achievement of the target (including external challenges such as regulatory changes, availability of technological solutions, need of significant investments, country-specific issues…); - possible enablers for the achievement of the target (government subsidies, availability of technological solutions, sectoral trends in the country, changes in customer/investor preferences…). To finance the transition, Intesa Sanpaolo made available €88bn for new lending opportunities of which €76bn to support the green and circular economy and the green transition (including Mission 2 NRRP), and €12bn dedicated to individuals, mostly in relation to green lending. At end 2025, new lending in support of the green economy, circular economy and ecological transition amounted to around €89.4bn, while new green mortgages amounted to €15.2bn. This commitment has been renewed in the Intesa Sanpaolo 2026-2029 Business Plan, with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities. Moreover, Intesa Sanpaolo is developing a number of products and services to support the transition, including advisory services (fully detailed in the Climate Report) also in relation to customer engagement. Attached you may find the 2025 Climate Report.

(5.2.14) Description of progress against transition plan disclosed in current or previous reporting period

Progress against transition plan disclosed in previous reporting periods: 1) Within its 2022-2025 Business Plan, Intesa Sanpaolo published its 2030 emissions reduction targets in the Oil & Gas, Power generation, Automotive and Coal mining sectors. With regard to coal mining in particular, the exposure target is zero by 2025, in line with the phase-out present in the "Rules for lending operations in the coal sector", updated in July 2021. In 2023 Intesa Sanpaolo worked on the setting of a new 2030 target for the Iron & Steel sector and a target for the Commercial Real Estate sector. As part of the continuous updating process Intesa Sanpaolo has also revised, in line with design choices made for the definition of SBTi targets, the Automotive and Power Generation sectors, finetuning perimeter and targets. In 2024, the Group announced new decarbonisation targets for four additional high-emitting sectors: Agriculture - Primary Farming, Aluminium, Cement and Residential Real Estate. Additionally, the level of ambition for the Commercial Real Estate sector was increased. At the end of 2024, 10 high emitting sectors have been covered by 2030 interim targets. 2) Including new and revised sectors, in 2025 targets cover around 73% of the financed emissions and around 87% of exposures to the highest emitting sectors indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. 3) Results for 2025 show a decrease in absolute financed emissions by 12% compared to 2024 for sectors covered by target setting. The Group confirms the achievement in 2025 of the phase-out for its exposure to counterparties active in the coal mining sector, as per exclusion policy; a marginal amount remains, mainly attributable to a non-performing exposure 4) Progress is quarterly monitored and results are analysed periodically to ensure alignment with the established targets. When necessary, the Group activates competent steering structures and evaluates potential 'consequence management' actions to foster target achievement. 5) The Section "Target setting on lending activities: annual reporting of estimated emissions" is subject to limited assurance available in the Independent Auditors' Report attached to the Climate disclosure. 6) On 27th January 2025, Intesa Sanpaolo obtained the validation of its emission reduction targets from the "Science Based Target initiative" (SBTi), following the submission of documentation in March 2024.

(5.2.15) Attach any relevant documents which detail your climate transition plan (optional)

2025_Climate_Report.pdf

(5.2.16) Other environmental issues that your climate transition plan considers

☑ Water

☑ Biodiversity

(5.2.17) Explain how the other environmental issues are considered in your climate transition plan

As described in the Climate report, which sets the framework for the Transition Plan, ISP, aware of the importance of nature and ecosystem protection, has integrated natural capital and biodiversity into its governance documents, starting from the Code of Ethics where protection of nature and biodiversity are considered and with the definition of Rules on Biodiversity and Nature in 2024, which set guidelines to manage impacts, risks and opportunities related to biodiversity and nature, including pollution and the impact on oceans and water. ISP assesses nature/biodiversity-related risks and opportunities across its lending activities and integrates nature-related considerations into its asset management activities. Regarding counterparty risk analysis, to assess clients' sustainability performance, ISP applies its proprietary ESG score developed in 2021 which considers Natural Resources and Biodiversity and Water among the descriptors analysed in the Environmental pillar. ISP also applies specific criteria defined in the Guidelines for the Governance of ESG Risks and in the Rules on biodiversity and nature to avoid financing activities/projects with major environmental impacts which meet at least one of the following criteria: a)Located in areas defined by Wetlands under the Ramsar Convention, IUCN protected areas I to VI, Alliance for Zero Extinctions (AZE) sites hosting the last populations of the most threatened species, UNESCO's main terrestrial and marine natural areas with high biodiversity; b)Categorised as controversial for their impacts/dependencies on biodiversity and nature which may expose the Bank to a significant reputational risk; c)Located in countries that haven't ratified key environmental conventions (red countries) and relate to activities potentially harmful for biodiversity, nature, pollution and water. Since 2007 ISP adopted the Equator Principles, voluntary international guidelines for identifying, assessing and managing environmental/social risks in project finance. In terms of biodiversity, nature and water opportunities for customers, the offer for SME clients includes MLT loans such as the S–Loan Progetti Green, which applies, among others, to initiatives relating natural capital such as biodiversity, sustainable management of natural resources and water efficiency.

(5.2.18) Adaptation-specific objectives included within your climate transition plan

☑ Yes

(5.2.19) Describe the adaptation objectives included in your climate transition plan or standalone adaptation plan

In the new 2026-2029 Business Plan Intesa Sanpaolo identifies adaptation as one of the strategic levers supporting environmental sustainability and transition, with the objective of expanding financing and insurance offerings, enabling climate-risk adaptation for rising physical hazards. In this context, Intesa Sanpaolo has launched several initiatives, including an internal initiative within the framework of the European Commission's 'Climate Adaptation & Resilience' aimed at supporting clients in advancing their adaptation efforts and strengthening resilience to withstand the impacts of climate change. This program is designed to support clients in identifying and understanding climate risks, implementing adaptation measures, and accessing related financing opportunities. Moreover, the Insurance Group,

aiming to contribute to climate change adaptation, has launched "Protezione Catastrofi Naturali Business", to safeguard businesses from the effects of extreme weather events. Additionally, to encourage clients to adopt proactive climate adaptation measures, the Insurance Group includes certain climate-related guarantees in its retail and business products that provide benefits when specific preventive measures are installed (e.g., wind and hail shutters, drainage systems to control water accumulation), either eliminating the deductible or reducing the excess in case of a claim.

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

☑ Products and services
☑ Upstream/downstream value chain
☑ Investment in R&D
☑ Operations

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

☑ Physical risks
☑ Transition risks
☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

ISP's climate strategy is based on a clear awareness of climate change risks (both transition and physical risks) and opportunities. The range of climate change risks and opportunities are identified and analysed to integrate them into the ordinary processes of risk assessment and monitoring and credit strategies. This is also reflected in the Group's commercial offer. The ISP 2022-25 Business Plan confirmed the strong focus on climate with the commitment to providing €88bn of which €76bn of new lending to support the green and circular economy and the green transition (including Mission 2 NRRP) and €12bn dedicated to individuals, mostly in relation to green lending. At the end of 2025, new lending in support of the green economy, circular economy and ecological transition amounted to ~€89.4bn (2021-25), while new green mortgages amounted to €15.2bn (2022-25). This commitment has been renewed in the 2026-29 Business Plan with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities. Under the 2022-25 Business Plan, ISP confirmed its commitment to Circular Economy through a dedicated credit facility of €8bn over the Plan time horizon. ISP achieved and exceeded this target, with total disbursements reaching €15.9bn by 2025. This takes place through the bank branches of Banca dei Territori Division, Corporate and Investment Banking Division, the support of the ISP Innovation Center for Circular Economy and International Subsidiary Banks Division. Within the Asset Management Division, Eurizon offers a range of products in all the asset classes, with the 2022-25 Business Plan envisaged the growth of assets under management classified under art.8 and 9 of the SFDR 2019/2088. In 2025 funds pursuant to art.8 and 9 accounted for 75.4% of Eurizon's total assets under management, while in the Fideuram Division, 79.4% of customer assets are classified as ex art.8 and 9 including non-Group funds, 87% of which fall under art 8 and 9. In 2017, ISP was the first Italian Bank to issue a €500mln Green Bond connected with environmental sustainability projects. Since then, it has issued over €10bn in Green Bonds (€8.67bn outstanding as of 31.12.2025). The Group's Green Loan Portfolio amounts to ~€21bn of eligible loans. In June 2026, ISP successfully placed a €1.25bn Senior Non-Preferred Green bond. Moreover, the Insurance Group, aiming to contribute to climate change adaptation, has launched "Protezione Catastrofi Naturali Business" to safeguard businesses from the effects of extreme weather events. Additionally, the Insurance Group includes climate-related guarantees in its retail and business products that provide benefits when specific preventive measures are installed (e.g.,wind, hail shutters), either eliminating the deductible or reducing the excess in case of a claim.

Upstream/downstream value chain

(5.3.1.1) Effect type

☑ Physical risks

☑ Transition risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

In terms of supply chain management, Intesa Sanpaolo aims to minimise climate risks and maximise opportunities arising from climate change. ISP monitors suppliers' sustainability practices, including environmental aspects, through the Suppliers' Gate portal, which enables to: manage registrations by collecting all the necessary information from suppliers, archive registration documents and their subsequent updates, run sourcing events (RFI, RFP, etc.), launch information campaigns towards suppliers, archive contracts signed with suppliers. The selection of suppliers takes place during the registration to the Suppliers' Gate by means of an ESG assessment (updated at least once a year) including analyses of the suppliers' environment and climate change requirements. If the result of this assessment is positive, the suppliers are registered in the Group Suppliers' Register and can be invited to procurement events. The supplier's qualification process allows the obtainment of a supplier's rating monitored over time with an updated screening of suppliers for the duration of the contractual relationship. Filling in the questionnaire is mandatory for all new suppliers, and, in order to progressively cover all previously registered suppliers, data request campaigns are launched once a year. In relation to specific product categories which have a higher environmental impact, suppliers who do not meet the minimum requirements may be excluded from procurement events. With regard to downstream value chain, ISP supports clients SMEs and corporates in improving their sustainability profile through a lending offer to support the transition to a low-emission economy, providing €88bn of which €76bn of new lending in order to support the green and circular economy and the green transition (including Mission 2 NRRP) and €12bn dedicated to individuals, mostly in relation to green lending to individuals. The commitment to Circular Economy was confirmed in the Plan with a dedicated credit facility amounting to €8bn. The development of a new business culture focused on sustainability and the acquisition of specific skills are required. In addition to financial resources, the Bank has put together a broad and structured range of solutions for customers, including a dedicated online training platform, bespoke training and support programmes, and ESG Laboratories. The ESG Laboratories are physical and virtual meeting places to support SMEs in their transition process, reaching a total of 16 Laboratories in 2025. Moreover, among the solutions offered to corporate and SMEs, Intesa Sanpaolo launched CO2 Mitigation Solutions, a dedicated decarbonisation service that offers innovative tools to support companies in their efforts to reduce CO2 emissions.

Investment in R&D

(5.3.1.1) Effect type

☑ Physical risks

☑ Transition risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Risks and opportunities arising from climate change have significantly influenced Intesa Sanpaolo's strategy in the innovation field, through the promotion of innovative green products, services that reduce exposure to climate change risks and the support of innovative businesses. The transition to a Circular Economy is supported by Intesa Sanpaolo Innovation Center, which established the Circular Economy Lab (CE Lab) in partnership with Cariplo Factory, aiming to foster the transformation of the Italian economic system. The CE Lab strategy relies on open innovation methodologies to identify advanced solutions and technologies in the circular economy field. In 2025, the CE Lab continued to support Corporations to develop innovative and circular business models, designing 9 Open Innovation programmes in the Energy & Waste Management, Food and Transport sectors. Intesa Sanpaolo also supports the growth of high-potential startups, including climate-focused ones, through dedicated acceleration paths. In 2025, Intesa Sanpaolo Innovation Center analysed more than 1,000 startups of which 44 were accelerated. Among the various growth and acceleration programmes, with reference to climate and biodiversity topics, it is worth emphasising: 'Techstars Transformative World Torino' (focus 'trend-setting and advanced technologies'); 'Terra Next' (focus 'Bioeconomy'); Maritime Ventures (focused on development of products or services for the digitalisation and innovation of SMEs operating in the nautical and port supply-chain etc). Neva SGR, the Group's venture capital company, also invests in climate tech and energy transition. Notably, through its funds, Neva has invested in U.S.-based Commonwealth Fusion Systems (CFS), a global leader in nuclear fusion that is developing the world's first commercially relevant net-energy fusion system. Neva's portfolio also includes Energy Dome, an Italian excellence that developed a new large-scale, high-efficiency, high-durability battery, etc. In 2025 Intesa Sanpaolo studies and research projects on climate change and related impacts and issues, involved contribution by different structures and entities of the Group, both to foster client awareness and engagement and to gain an in-depth knowledge of relevant topics. Among the most relevant publications issued in 2025 by Intesa Sanpaolo Research Department (also in cooperation with specialised external partners): the 11th edition of the Bioeconomy in Europe Report, the Green Bond Brief, an analysis of supply and demand dynamics in the Green Government Bond Market in Europe), the second issue of the ACEA and Intesa Sanpaolo Water Sector Observatory, focused on agricultural sector uses, etc. Moreover, in 2025 Intesa Sanpaolo Innovation Center concluded an applied research investigating how flood risk impacts the Italian housing market.

Operations

(5.3.1.1) Effect type

☑ Physical risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

With reference to direct impacts, Intesa Sanpaolo is committed to analysing and containing possible risks on its properties as well as taking immediate action in the event of environmental disasters. To this end, in line with the provisions of the 2022-2025 Business Plan, a specific tool was identified that allows to calculate the level of exposure of Intesa Sanpaolo's real estate assets to the main territorial and climate change risks. This tool geolocates, for the Italian perimeter, each individual asset and calculates the exposure index for each risk, based on data from the main national and international certified sources, such as SwissRE, Copernicus, INGV, ISPRA, Civil Protection etc. The platform also considers a variety of physical risks and territorial factors (e.g. earthquakes, landslides, flooding, drought) and additional features are underway to provide an overall index of exposure to geographical and climate risks for each real estate asset. The Risk Assessment Document, which evaluates risks to workers' health and safety (Italian Legislative Decree 81/2008), also assesses hydrogeological risk due to flooding and landslides. The hydrogeological risk assessment of buildings is conducted both as a preventive measure and also following external events with a view to ensuring that the buildings involved maintain all safety standards. With regard to hydrogeological instability, the benchmark for flooding is based on the level of hazard associated with a floodable area and depends on the probability of the area being flooded. As regards landslides, data from the World Bank are used for foreign building, while in Italy the reference criterion is based on the level of hazard associated by the ISPRA Hydrogeological Structure Plans (PAI) with an area subject to landslide phenomena. Areas at risk from landslides identified by the PAI also include, in addition to landslides that have already occurred, the areas of possible evolution of the phenomena and the areas potentially susceptible to new landslides. These assessments, together with the daily analysis of Arpa's weather alert bulletins and the Department of Civil Protection on critical national and regional issues, enable the Group in Italy to implement actions that take account of the effects of critical events connected with natural phenomena deriving from climate change, allowing the management of different potential risk scenarios, indicated in the Emergency Plans, to mitigate their potential damage to workers and Stakeholders. In the case of very serious disasters, the Emergency Management Operations Centre of the Business Continuity Management Department is also activated, which monitors the situation and assesses the need to temporarily close facilities and take any additional action. To ensure business continuity in the areas most affected by the inclement weather, the crisis delegates of local and central structures are also activated for timely reporting of critical situations.

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

(5.3.2.1) Financial planning elements that have been affected

☑ Revenues

☑ Direct costs

(5.3.2.2) Effect type

☑ Physical risks
☑ Transition risks
☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

The Group's financial planning considers climate-related risks and opportunities in relation to revenues and direct costs. These risks and opportunities are also taken into the financial materiality assessment under the CSRD, which identifies ESG factors with actual or potential financial impact on assets, costs, and revenues. ISP supports the transition to a low-carbon economy by promoting renewable energy, energy efficiency and the circular business model, and encourages customer segments committed to reducing their environmental footprint. To manage risk exposure, ISP has established policies, IT and organizational processes, controls and limits to identify, estimate and monitor financial and non-financial risks.The Risk Appetite Framework integrates and translates into specific controls what has been defined in terms of strategic guidelines through the Climate/ESG Materiality Assessment and the ESG Sectoral Color Coding, identifying limits, Key Risk Indicators and specific actions aimed at containing ESG risks. In terms of opportunities, as an example related to revenues, planning includes €88bn of which €76bn of new lending to support the green and circular economy and the green transition(€89.4bn disbursed since 2021) and €12bn dedicated to individuals(€15.2bn disbursed in 2022-25). The commitment to Circular Economy was confirmed with a dedicated credit facility of €8bn(2022-25)(€15.9bn disbursed by 2025). The green bonds market also represents an opportunity: ISP's strategy was to develop these products within its funding target (overall €42bn) set in the 2022-25 Business plan.As of December 2025, ISP had €8.67bn in outstanding green bonds. The Group's Green Loan Portfolio amounts to ~€21bn of eligible loans. As for sustainable investments, in 2025 funds pursuant to art.8 and 9 of SFDR 2019/2088 accounted for 75.4% of Eurizon's AuM, while in the Fideuram Division, 79.4% of customer assets are classified as ex art.8 and 9 including non-Group funds, 87% of which fall under art.8 and 9. Insurance offer-life business: At December 2025 the AuM relative to art.8 and 9 investment options was €87.7bn(46% of the total AuM).As for costs, the budget includes climate-related costs for both own and financed emissions like mitigation actions on the Group's premises. Beyond managing its own environmental footprint, ISP aims to positively influence the broader value chain and promote the transition by orienting capital and resources toward a sustainable economy.

(5.10) Does your organization use an internal price on environmental externalities?

Carbon

(5.10.1) Use of internal pricing for this environmental externality

☑ Yes

Water

(5.10.1) Use of internal pricing for this environmental externality

☑ No, and we do not plan to in the next two years

(5.10.2) Primary reason for not pricing this environmental externality

☑ Not an immediate strategic priority

(5.10.3) Explain why your organization does not price this environmental externality

Given the evolving European ESG regulatory landscape, ISP is monitoring regulatory developments, market trends and best practices related to internal water pricing to assess potential future developments. At present, the Group is prioritising the implementation of an internal carbon pricing approach, while internal water pricing is not considered an immediate strategic priority.

Other

(5.10.1) Use of internal pricing for this environmental externality

☑ No, and we do not plan to in the next two years

(5.10.1) Provide details of your organization’s internal price on carbon.

(5.10.1.1) Type of pricing scheme

☑ Shadow price

(5.10.1.2) Objectives for implementing internal price

☑ Conduct cost-benefit analysis
☑ Drive energy efficiency
☑ Incentivize consideration of climate-related issues in decision making
☑ Identify and seize low-carbon opportunities

(5.10.1.3) Factors considered when determining the price

☑ Alignment to scientific guidance
☑ Social cost of climate-related impact

(5.10.1.4) Calculation methodology and assumptions made in determining the price

The definition of the internal carbon pricing is based on an assessment of the social cost of climate-related impacts with the LCIA Environmental Prices method (CE Delft, Environmental Prices Handbook EU28 version, 2018) and compared with the recommendation of the Network for Greening the Financial System (NGFS) "NGFS Scenarios for Central Banks and Supervisors" (September 2022). The implementation of an internal carbon pricing system by the Group is based on the shadow price and applies to Green Banking Procurement, particularly to all procurement activities related to Information and Communication Technologies (ICT), which are managed centrally in accordance with the Group’s purchasing policy. The price-setting mechanism applies to environmental impact analysis through a technical assessment of the equipment, as well as an evaluation of energy consumption and environmental characteristics. The ICP was raised to €100/tCO2eq in 2023, a significantly higher value than the €64/tCO2eq indicated by the NGFS, aligning with the recommendation to increase internal prices in pursuit of the 1.5°C goal and falling within the €50-160/tCO2eq range proposed by the LCIA Environmental Prices. The emissions included within the scope of the ICP are Scope 2 Location-Based emissions related to electricity consumption (emissions associated with the use of IT devices in scope), amounting to 3,000 tCO2eq in 2025.

(5.10.1.5) Scopes covered

☑ Scope 2

(5.10.1.6) Pricing approach used – spatial variance

☑ Uniform

(5.10.1.8) Pricing approach used – temporal variance

☑ Static

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

100

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

100

(5.10.1.12) Business decision-making processes the internal price is applied to

☑ Procurement
☑ Value chain engagement

(5.10.1.13) Internal price is mandatory within business decision-making processes

☑ Yes, for some decision-making processes, please specify :Carbon price is applied to Procurement of IT equipment (e.g. computers, multifunctional printing devices, etc.) and suppliers are requested to provide mandatory environmental information and are engaged on the issue.

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

3.09

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

The environmental impacts generated by office equipment in a large service company such as Intesa Sanpaolo are relevant. On the basis of the "Green Banking Procurement Rules" updated in May 2026, among the main environmental impacts are to be considered energy consumption, the resulting carbon dioxide emissions into the atmosphere, waste generation, the consumption of materials such as paper, toner and office supplies and the purchase of office equipment. Intesa Sanpaolo introduced the use of an internal price on carbon, applied to procurement of IT equipment (e.g. computers, multifunctional printing devices, etc.). The internal price on carbon has been applied to IT equipment as an integration to the environmental criteria already in place for the evaluation of the different offers (e.g. energy efficiency, environmental labels, etc.). In 2025, the main categories of office equipment centrally purchased subject to Green Banking Procurement criteria evaluations were the following: Laptops: 78%; Mini-desktops: 15%; Cash-in cash-out machines: 99%; ATMs/MTAs: 41%; Monitors: 86%; Printers: 15%; Scanner: 89%. Shadow price helps to show financial advantages linked to greener products and therefore to inform better sustainable purchases. The internal price on carbon is applied to the GHG emissions generated by the electricity consumed by the IT equipment, based on product certifications (e.g. Energy Star) and/or declarations from suppliers. The resulting cost is added to the purchase cost and to the cost of use (energy) contributing to the life cycle cost of the machines. The evaluation supports Intesa Sanpaolo in the selection of the most advantageous supply considering a life cycle perspective. This application is expected to have a positive effect on the energy efficiency of the organization in a medium-long term.

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Clients		

	Engaging with this stakeholder on environmental issues	Environmental issues covered
	☑ Yes	
Investees	☑ Yes	
Suppliers	☑ Yes	☑ Climate change
Smallholders	☑ Yes	
Investors and shareholders	☑ Yes	☑ Climate change
Other value chain stakeholders	☑ Yes	☑ Climate change

(5.11.3) Provide details of your envirnmental engagement strategy with your clients

☑ Clients of Banks

(5.11.3.2) Environmental issues covered by the engagement strategy

☑ Climate change

(5.11.3.3) Type and details of engagement

Capacity building

☑ Other capacity building activity, please specify :Engage with clients and potential clients, particularly those with the most GHG-intensive and GHG-emitting activities, on their decarbonization strategies and net-zero transition pathways

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

☑ 100%

(5.11.3.5) % of portfolio covered in relation to total portfolio value

☑ 26-50%

(5.11.3.6) Explain the rationale for the coverage of your engagement

Intesa Sanpaolo undertakes different engagement initiatives. The number reported in column 5 refers to the target setting project. Engagement is targeted at clients with the highest potential impact on climate. Customers in target setting perimeter are included in potential engagement actions which may also include an analysis of their transition plan. As of 31 December 2025, the portfolio coverage in relation to the total drawn amount (€430.7bn) for sectors within the scope of the Target Setting methodology was 29.7%. Intesa Sanpaolo emissions reduction targets are related to the accounting of the significant majority of the bank's portfolio emissions among the highest-emitting sectors as indicated in the 'Guidelines for Climate Target Setting for Banks', issued by UNEP FI, and most relevant for the Group. The sectors included in target setting are: Agriculture – Primary Farming, Aluminium, Automotive, Cement, Coal Mining, Commercial Real Estate, Iron & Steel, Oil & Gas, Power Generation, Residential Real Estate.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

The engagement strategy is communicated to the public every year within the Climate Report. In the 2025 Climate Report here attached, specific paragraphs are dedicated to: - CLIENT ENGAGEMENT AND TRAINING (pages 56-59). Intesa Sanpaolo customer engagement activities involve different customer segments and topics within the broader ESG area. In order to contribute to worldwide efforts in climate change mitigation and align with its 2050 Net Zero commitment, in 2025 Intesa Sanpaolo implemented various initiatives. These were designed to foster ESG awareness among corporations and advance, among others, the goals of energy transition, circular economy, education, sustainable living spaces; - SECTORAL TRANSITION PLAN (pages 143-170): for each sector (the sectors included in target setting are: Agriculture – Primary Farming, Aluminium, Automotive, Cement, Commercial Real Estate, Iron & Steel, Oil & Gas, Power Generation, Residential Real Estate), specific actions are set out to enable reaching the target; among these, client engagement is mentioned several times as it is an important lever.

(5.11.3.8) Attach your engagement strategy

2025_Climate_Report.pdf

(5.11.3.9) Staff in your organization carrying out the engagement

☑ Specialized in-house engagement teams

☑ Senior-level roles

☑ Other, please specify :Relationship managers within the Corporate Division engage with companies, assisted by the ESG Advisory Team, also in charge of devising customized ESG instruments linked to companies' strategies and transition plans.

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

☑ Other, please specify :CFO team and persons in charge of ESG

(5.11.3.11) Effect of engagement, including measures of success

Within client engagement, Intesa Sanpaolo has developed different actions. Among these, currently Intesa Sanpaolo has set decarbonisation targets in 10 sectors representing 29.7% of total drawn amount, overall, the sectors covered by target setting account for ~73% of the 2025 financed emissions and ~87% of exposures to the highest-emitting sectors indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. % of client-related Scope 3 emissions is 100% as these refer to the emissions of the 10 sectors in scope of target setting project. Measure of success and threshold (engagement has been one of the drivers that helped achieve the following results): Intesa Sanpaolo is committed to support the transition of clients with GHG-intensive and GHG-emitting activities. Intesa Sanpaolo declared the goal to provide up to €76bn for client financing (green and ecological transition), within the National Recovery and Resilience Plan time horizon (2021- 26), of which €89.4bn already disbursed since 2021. % of target achieved 118% (exceeding the expected amount budgeted for the 5 years 83%). This commitment has been renewed in the Intesa Sanpaolo 2026-2029 Business Plan with the goal of disbursing ~€87bn in new MLT lending for the sustainable transition over 2026-2029, as part of the Plan target to allocate 30% of total new MLT lending over the Plan time horizon, with a strong focus on social and environmental activities.In addition, one of the main 2025 result for the target setting perimeter is represented by the reduction of financed emissions for the 10 sectors in scope of target setting from 20.4 MtCO2e in 2024 to 17.9 MtCO2e in 2025 (-12% vs 2024, -26% vs 2023, -41% vs 2022). Tracking: Intesa Sanpaolo tracked the achievement of its customer engagement in different ways, among others monitoring the financing under the €76bn plafond and the financed emissions quarterly. Annual results are monitored against yearly budget within the Business Plan.

(5.11.3.12) Escalation process for engagement when dialogue is failing

☑ Yes, we have an escalation process

(5.11.3.13) Describe your escalation process

Relationship managers and ESG teams work with customer representatives to develop ESG initiatives. Among these initiatives, monitoring of client ESG performance, which includes environmental aspects, is taken into consideration both during the origination discussions with the clients and as part of the credit underwriting process. In case of low results, the bank can engage with the client for further investigation, considering, when necessary, any potential adjustment to the financing terms and conditions. Also, within the target setting project, targets progress is periodically monitored, and results are analysed periodically to ensure alignment with the established targets. When necessary, the Group activates competent steering structures and evaluates potential 'consequence management' actions to foster target achievement.

(5.11.3.1) Type of clients

☑ Clients of Asset Managers

(5.11.3.2) Environmental issues covered by the engagement strategy

☑ Climate change

(5.11.3.3) Type and details of engagement

Innovation and collaboration

☑ Other innovation and collaboration activity, please specify :The Asset Management Division collaborates with Intesa Sanpaolo Asset Owner and the other clients to increase awareness on climate change issues

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

☑ 1-25%

(5.11.3.5) % of portfolio covered in relation to total portfolio value

☑ 1-25%

(5.11.3.6) Explain the rationale for the coverage of your engagement

The Asset Management Division believes that environmental, social and corporate governance factors have an impact on portfolio performance, and that the adoption of ESG and SRI criteria can contribute to improve the ability to respond more effectively to Clients'/Investors' expectations, aligning investment activities with the broader interests of customers themselves. Listening to customers' needs is achieved through the monitoring of the different sales channels, participation in multi-customer market surveys and through periodic questionnaires addressed to customers that enable the Company to grasp possible areas for improvement in its business. To this end, through its communication channels, Eurizon undertakes to guarantee transparency to its customers with respect to the products and services it offers, providing documentation in line with the applicable regulatory framework, its social responsibility and its values. Furthermore, Eurizon's commitment takes the form of financial education and training initiatives that, in addition to enabling the development of specific skills, aim to spread knowledge of issues related to asset management and finance. Among others, Eurizon makes available to customer networks and institutional customers Eurizon WISE, a training model that delivers training content to achieve and maintain the knowledge and competence requirements for Financial Advisors by the Regulator. In addition, in 2025 Eurizon continued its engagement service format called "Engagement a Porte Aperte", giving its institutional clients the opportunity to participate in 5 engagements focused on decarbonisation strategies since its launch in 2024. Within the Asset Management Division clients' perimeter, Intesa Sanpaolo Assicurazioni (Intesa Sanpaolo Insurance Division) represents one of the most important clients, which delegates the Intesa Sanpaolo Asset Management Division to manage part of their assets and engage with their investees. In addition, within the sustainability reporting, clients were engaged in the identification and assessment of the materiality of the impacts, risks and opportunities linked to the sustainability matters related to the Asset Management Division.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

The engagement strategy is communicated to the public every year within Eurizon's Sustainability Report. In the 2025 Sustainability Report here attached, a specific paragraph is dedicated to Eurizon's communication channels and commitment towards clients (pages 95-96), according to which the company is inspired by principles based on listening and dialogue with customers, transparency, fairness, accessibility and sustainability of the products and services offered. For details and examples see: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ReportSostenibilita_eng.pdf. Moreover, the Asset Manager actively monitors corporate events connected to the financial instruments in the portfolio of managed UCIs, where required by the characteristics of the instruments that incorporate rights to be exercised. Regular reports are provided following engagement activities. Regarding the mandate from Intesa Sanpaolo Assicurazioni (Intesa Sanpaolo Insurance Division), the Asset Management Division shares its engagement strategy in defining the mandate itself and periodically reports its engagement activities to its client. For the full document on the Engagement Policy please see the Engagement Policy on the Website:

https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ECSGR_EngagementPolicy.pdf. For the details and examples on the engagement on FY 2025 please see the Eurizon's 2025 Stewardship Report: eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/stewardship-report-eng.pdf.

(5.11.3.8) Attach your engagement strategy

engagement strategy client.pdf

(5.11.3.9) Staff in your organization carrying out the engagement

☑ Specialized in-house engagement teams

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

☑ Investor relations managers

☑ Other, please specify :Sustainability dept and other teams

(5.11.3.11) Effect of engagement, including measures of success

The Asset Management Division and the Intesa Sanpaolo Asset Owner meet periodically to discuss and review the issues faced during engagement activities conducted by the Asset Manager on behalf of Asset Owner, as well as to comment on the outcomes of these engagement meetings and any follow-up actions to be taken. Overall, engagement activities carried out with clients have proven effective in raising awareness and fostering more informed, sustainability-oriented investment decisions. The success of the engagement strategy lies in meeting the growing demand from clients for investment products with ESG characteristics, also considering the transparency requirements set out by the SFDR regulation. This regulatory alignment, combined with the increasing client demand for more responsible investment solutions, is clearly visible in the AuM flows towards this segment. As a result, the share of Article 8 and 9 funds continues to grow steadily. As of December 31 2025, these funds managed by Eurizon Asset Management reached 169.2 billion euro in Assets under Management (AuM), up from 110 billion euro in 2021. Their share of Eurizon's total AuM grew from 54% in 2021 to 75.4% in 2025, exceeding the 60% target set for 2025. Similarly, Fideuram – Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland recorded €47bn of investment funds classified under Articles 8 and 9 of the SFDR in 2025, accounting for 89% of the total assets of the funds managed, compared to approximately €26bn (61% of total AuM) in 2021.

(5.11.3.12) Escalation process for engagement when dialogue is failing

☑ No, we don't have an escalation process

(5.11.3.1) Type of clients

☑ Clients of Insurers

(5.11.3.2) Environmental issues covered by the engagement strategy

☑ Climate change

(5.11.3.3) Type and details of engagement

Financial incentives

☑ Other financial incentive, please specify :The engagement aims to raise clients' awareness by suggesting measures to 1) reduce driving impact and lower insurance costs through less car use; and 2) protect their homes from climate risks by promoting preventive measures

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

☑ Unknown

(5.11.3.5) % of portfolio covered in relation to total portfolio value

☑ 1-25%

(5.11.3.6) Explain the rationale for the coverage of your engagement

Rationale for the coverage of the engagement: Intesa Sanpaolo Protezione has broadened its customer engagement approach by introducing the new "Scelte sostenibili" (Sustainable Choices) section on its corporate website. This initiative is designed to reach the entire customer base, providing accessible information and practical guidance on how insurance solutions can support more sustainable and resilient behaviours. Through this dedicated platform, the Company promotes

awareness of climate-related risks, prevention measures and sustainable choices in everyday life, encouraging customers to adopt behaviours that contribute to environmental protection and greater resilience while strengthening the integration of ESG principles into customer relationships.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

The engagement initiatives were carried out through the publication of informative content on the Intesa Sanpaolo Protezione website (https://www.intesasanpaoloprotezione.com/it/chi-siamo/il-nostro-impegno-esg/scelte-sostenibili.html). Specifically, guides are available offering eco-friendly advice aimed at reducing car consumption, raising awareness of climate risks, and promoting the adoption of preventive measures to protect homes.

(5.11.3.8) Attach your engagement strategy

Eco consigli.pdf

(5.11.3.9) Staff in your organization carrying out the engagement

☑ Other, please specify :Sustainability Team

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

☑ Other, please specify :Motor Customers, Home insurance customers and Business customers

(5.11.3.11) Effect of engagement, including measures of success

The "Scelte sostenibili" (Sustainable Choices) initiative, introduced on the Intesa Sanpaolo Protezione website, has strengthened the Company's customer engagement by providing a dedicated section to raise awareness of climate-related risks, prevention measures and sustainable behaviours. Through informative content and practical guidance, the initiative aims to increase customers' awareness and encourage choices that enhance climate resilience and environmental protection. The effectiveness of the engagement is assessed through the dissemination of the initiative and customer interactions with the digital content. The engagement activity through eco-advice increased the awareness of responsible vehicle use in order to generate less environmental impact. However, the impact of this activity cannot be determined because it is possible to measure only mileage but not the customer's driving style and vehicle condition to determine vehicle emissions. In 2025, more than 116,866 ViaggiaConMe product (characterised by the option described in this row) were underwritten. Overall, in 2025 premiums for all climate-related coverages reached almost 55 million euro. The engagement of Home insurance customers has been estimated by assessing clients who adopted preventive measures relative to the total number of claims in the portfolio. Approximately 1% of the portfolio installed such measures and were positively impacted as their deductible was waived.

(5.11.3.12) Escalation process for engagement when dialogue is failing

☑ No, we don’t have an escalation process

(5.11.3.1) Type of clients

☑ Clients of Banks

(5.11.3.2) Environmental issues covered by the engagement strategy

☑ Forests

(5.11.3.3) Type and details of engagement

Capacity building

☑ Support clients to set their own environmental commitments across their operations

Innovation and collaboration

☑ Other innovation and collaboration activity, please specify :support client companies in the environmental transition by protecting natural capital (like forests) and helping reduce CO_2 emissions to mitigate climate change

(5.11.3.5) % of portfolio covered in relation to total portfolio value

☑ Less than 1%

(5.11.3.6) Explain the rationale for the coverage of your engagement

The Think Forestry programme, launched in November 2023 by Intesa Sanpaolo, is designed to accompany client companies on the path of environmental transition, with the objective of safeguarding and enhancing natural capital. To support the reforestation and preservation of natural capital across Italy, the programme provides access to a network of top-tier national forestry initiatives thanks to an agreement with the non-profit organisation Rete Clima. In this context, an extensive planting programme has been initiated with the goal of contributing to the 'reforestation' of Italian territory. The Bank actively participates in the programme by setting an example, supporting tree planting in different Italian cities and encouraging participation from its corporate clients. The development of the initiative involved households through a specific initiative by For Funding, Intesa Sanpaolo's crowdfunding platform aimed at supporting social and environmental initiatives with the greatest impact through contributions from individuals and resources from the Group. In particular, the Bank decided to allocate to this project also a portion of the transaction fees from credit card transactions. Moreover, the "CO2 mitigation solutions" initiative aims to offer innovative tools to support SMEs clients' efforts to measure and reduce their CO2 emissions and manage their residual emissions. The aim is to address all phases of the emission management and reduction process by businesses, providing Intesa Sanpaolo customers with the opportunity to: measure their carbon footprint using a specific tool; define and commit a multi-year CO2 emissions reduction pathway consistent with science-based scenarios (GHG protocol); act concretely on the basis of a set of industrial decarbonisation proposals; economically support international climate change mitigation projects. Engagement's coverage is directly linked to Think Forestry programme. Each corporate company can contact its relationship manager to explore the available ESG initiatives and formalise its commitment, together with the Bank's, towards a more sustainable future.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

The engagement strategy is communicated to the public every year within the Climate Report. In the 2025 Climate Report here attached, the programmes "Think Forestry" and "CO2 Mitigation Solutions" are described on page 50 and 52, outlining their role in supporting client companies on their environmental transition and in promoting reforestation and CO_2 emission management. In addition to the Climate Report, the initiatives are also shared through the Bank's official website (https://www.intesasanpaolo.com/it/business/landing/info/progetto-think-forestry.html; https://group.intesasanpaolo.com/it/sostenibilita/news/ultime-di-sostenibilita/2025/co2-mitigation-solution), where dedicated sections present the "Think Forestry" programme and the "CO2 Mitigation Solutions" initiative. This ensures transparency and accessibility, allowing corporate clients to understand the Group's approach and how to get involved.

(5.11.3.8) Attach your engagement strategy

2025_Climate_Report.pdf

(5.11.3.9) Staff in your organization carrying out the engagement

☑ Senior-level roles

☑ Other, please specify :Relationship managers in Banca dei Territori help companies protect natural capital and reduce CO_2 emissions to accelerate climate change mitigation

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

☑ Other, please specify :CFO/Finance area and people in charge of ESG

(5.11.3.11) Effect of engagement, including measures of success

The effect of the Think Forestry engagement initiative can be measured through the concrete reforestation activities carried out and the participation of client companies. Up to 2025, a total of fourteen interventions were carried out across various areas in Italy, directly contributing to national reforestation and the protection of natural capital. Specifically, five reforestation initiatives were already undertaken during 2025, demonstrating the programme's continued expansion and operational success.

(5.11.3.12) Escalation process for engagement when dialogue is failing

☑ Yes, we have an escalation process

(5.11.3.13) Describe your escalation process

An escalation process exists for clients who subscribe to the CO_2 Mitigation Solution initiative. Upon subscription, clients commit to specific decarbonisation targets. The Bank engages in dialogue with these clients to assess their level of commitment and support them in improving their emissions profile and achieving the agreed targets.

(5.11.4) Provide details of your environmental engagement strategy with your investees.

(5.11.4.1) Environmental issues covered by the engagement strategy

☑ Climate change
☑ Forests
☑ Water

(5.11.4.2) Type and details of engagement

Capacity building

☑ Support investees to develop public time-bound action plans with clear milestones

☑ Support investees to set their own environmental commitments across their operations

Information collection

☑ Collect climate transition plan information at least annually from investees

☑ Collect GHG emissions data at least annually from investees

☑ Collect targets information at least annually from investees

Innovation and collaboration

☑ Encourage collaborative work in landscapes or jurisdictions

☑ Engage with investees to advocate for policy or regulatory change to address environmental challenges

☑ Facilitate adoption of a unified climate transition approach with investees

(5.11.4.3) % of scope 3 investees associated emissions as reported in 12.1.1/12.1.3

☑ 100%

(5.11.4.4) % of investing (Asset managers) portfolio covered in relation to total portfolio value

☑ 76-99%

(5.11.4.5) % of investing (Asset owners) portfolio covered in relation to total portfolio value

☑ 1-25%

(5.11.4.6) Explain the rationale for the coverage of your engagement

In column % of scope 3 investees associated emissions, the Asset Manager considered in the denominator the investee companies where it is possible to apply an engagement strategy and in column % of investing (Asset managers) portfolio covered in relation to total portfolio value, the denominator includes the above-mentioned investees together with the assets for which the Asset Owner Division gives mandate to Eurizon for their engagement activities. The Division's engagement strategy is driven by Engagement policies applied to all investee companies. The Division believes that ESG factors impact portfolio performance and that the adoption of ESG and SRI criteria can improve the ability to respond effectively to clients'/investors' expectations. Priority issues for engagement are identified periodically via the Responsible Investments&Stewardship entity also considering the results of the participation in Shareholder Meetings in the previous year. In 2025, the environmental topics identified were:1)"Climate change mitigation and adaptation" under which Eurizon monitored and assessed issuers' alignment with the Net Zero scenario using the NZIF methodology promoted by IIGCC, assessed the credibility of issuers' transition plans, and voted on "Say on Climate" proposals on climate transition strategies presented by investee companies;2)"Mitigating biodiversity loss and combating deforestation", encouraging issuers to adopt measures to counter biodiversity loss and deforestation. The Division encourages dialogue and participation in Shareholder Meetings of selected companies with shares listed on Borsa Italiana and international markets, adopting a "targeted" approach to corporate governance, considering the usefulness of participating in the interests of managed assets, also based on the single reference markets and/or the specific circumstance, and the possibility of influencing decisions in relation to the voting rights held. Eurizon also promotes proactive engagement with investee companies through one-way communication, two-way dialogue and collective initiatives promoted jointly with other investors within international associations in which it participates, such as IIGCC, UN PRI, CA100+ and NA100. To optimise engagement initiatives, the materiality of additional areas of interest may be assessed also according to the sector of the issuing companies, such as gender diversity and aspects of cybersecurity, including the use of Artificial Intelligence tools.

(5.11.4.7) Describe how you communicate your engagement strategy to your investees and/or to the public

Please note that the Engagement Policy is public on the Website: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ECSGR_EngagementPolicy.pdf. Eurizon actively monitors corporate events connected to the financial instruments in the portfolio of managed UCIs, where required by the characteristics of the instruments that incorporate rights to be exercised. To identify issues in advance, while minimising any potential loss of value arising from aspects related to the performance of the companies in which it invests on behalf of the managed assets, as well as any major negative effects of investment decisions, Eurizon identified three main stages of the engagement activities adopted with investee issuers: (i) PREPARATION: identification of issuers to be contacted, also according to the "macro-themes" of interest to the Company; analysis of available public material to identify the focus of the dialogue; (ii) EXECUTION: Launch of engagement activities with the identified company: exchanges can take place via email, virtual meetings or face-to-face meetings. Evaluation of the information acquired from the issuer and assessment of whether the engagement should be prolonged or escalation measures should be undertaken. Launch of a possible escalation process; (iii) CLOSURE: Closure of the engagement activity if the feedback is considered satisfactory. In the event of a negative outcome of any escalation action, the Company will consider divesting the assets. The outcome of engagement is summarised in a dedicated report (Stewardship Report) available to the public on the website. The report includes details and examples of the engagement activities. For full year 2025 please see: eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/stewardship-report-eng.pdf.

(5.11.4.8) Attach your engagement strategy

SGR_EngagementPolicy_eng.pdf

(5.11.4.9) Staff in your organization carrying out the engagement

☑ Specialized in-house engagement teams

(5.11.4.10) Roles of individuals at the portfolio organizations you seek to engage with

☑ Investor relations managers

☑ Other, please specify :Head of Sustainability dept

(5.11.4.11) Effect of engagement, including measures of success

Among the targets linked to NZAMI published by Eurizon, the Stewardship target aims to implement specific engagement and voting actions towards investee companies to incentivise them to undertake decarbonisation paths and progressively align to the Net Zero scenario. In the context of this target, since joining NZAMI at the end of December 2021 up to December 2025, Eurizon has engaged 83 issuers accounting for 75.57% of the financed emissions of the NZAMI portfolio in Scope, through bilateral and collective engagement actions; indeed, Eurizon aims to conduct engagement activities with companies accounting for 70% of the financed emissions of the Portfolio in Scope by 2025 (achieved), with a target of 90% by 2030. Measure of success and threshold: the reduction of the Portfolio in Scope's weighted average carbon intensity (WACI): Eurizon aims to reduce the WACI of its Portfolio in Scope by 50% by 2030 vs. Baseline Year. Stewardship activities supported the reduction of the Weighted Average Carbon Intensity (i.e. WACI) of the Portfolio in Scope, that dropped to 102.67 tCO2/mln$ in December 2025. If compared to 166.47 tCO2/mln$ in 2019 baseline, WACI recorded a 38.33% reduction, in line with target ambition of -50% at 2030. For all the other achievements please see Eurizon's Net Zero Progress Report 2025 and 2025 Climate Report for a summary of Eurizon and Fideuram targets and achievements. 2025 Climate Report: https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf, Net Zero Progress Report 2025: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/Net-Zero-Progress-Report-EN.pdf.

(5.11.4.12) Escalation process for engagement when dialogue is failing

☑ Yes, we have an escalation process

(5.11.4.13) Describe your escalation process

The engagement process includes a medium-term monitoring cycle aimed at assessing the progress made by issuers, with a particular focus on the 'macro-themes' identified as priorities by the Asset management Company. Such assessments typically require a timeframe of at least 18-36 months. If investee issuers do not respond constructively, the Asset Management Company will consider activating appropriate escalation processes, which may include two levels: First level -

increasing the frequency of contacts with the issuer; sending of formal notices to state the Asset Manager's expectations; collaborative cooperation with other institutional investors, as outlined in Principle No. 4, for the purpose of submitting comments or specific requests for in-depth analysis of particular issues; Second level - making public statements at General Meetings; abstaining from voting or voting against resolutions at General Meetings; evaluation of possible divestments of shareholdings within the ESG Committee. The escalation process is public in the Engagement policy and in the Eurizon 2025 Stewardship Report. Engagement Policy: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ECSGR_EngagementPolicy.pdf; Stewardship Report: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/stewardship-report-eng.pdf.

(5.11.4.1) Environmental issues covered by the engagement strategy

☑ Climate change

(5.11.4.2) Type and details of engagement

Capacity building

☑ Support investees to develop public time-bound action plans with clear milestones

☑ Support investees to set their own environmental commitments across their operations

Information collection

☑ Collect climate transition plan information at least annually from investees

☑ Collect GHG emissions data at least annually from investees

☑ Collect targets information at least annually from investees

Innovation and collaboration

☑ Engage with investees to advocate for policy or regulatory change to address environmental challenges

☑ Facilitate adoption of a unified climate transition approach with investees

(5.11.4.3) % of scope 3 investees associated emissions as reported in 12.1.1/12.1.3

☑ 100%

(5.11.4.4) % of investing (Asset managers) portfolio covered in relation to total portfolio value

☑ 76-99%

(5.11.4.5) % of investing (Asset owners) portfolio covered in relation to total portfolio value

☑ 1-25%

(5.11.4.6) Explain the rationale for the coverage of your engagement

In column "% of scope 3 investees associated emissions" and "% of investing (Asset owners) portfolio covered in relation to total portfolio value" the Asset Owner has considered in the denominator the investee companies for which it is possible to implement an engagement strategy (direct investments). The Group promotes proactive engagement with issuer, both by exercising participation and voting rights, through the delegated Asset Manager (Eurizon, part of ISP Group), and through discussions with the investee companies, encouraging effective communication with the companies' management (so-called 'active ownership - engagement'). If the managed assets already include investments in issuers operating in sectors deemed not 'socially responsible' and in issuers defined as 'critical', the Group has provided for engagement activities - through the delegated Asset Manager (Eurizon) - or divestment according to the timing deemed most appropriate in the interest of clients. ISP Assicurazioni is committed to engage with Oil&Gas companies to promote a sustainable transition. The aim is to encourage companies to: • Set absolute and intensity-oriented emissions targets that are science-based. • Publish detailed transition plans. • Align corporate strategy and investments with decarbonisation goals. • Address fugitive methane emissions. • Avoid dependence on carbon-intense unconventional oil and gas. • Avoid investing in new drilling in sensitive areas such as the Arctic. For full details in terms of delegated Asset Manager engagement strategy please consider Eurizon policy: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ECSGR_EngagementPolicy.pdf.

(5.11.4.7) Describe how you communicate your engagement strategy to your investees and/or to the public

As stated in the column "Explain the rationale for the coverage of your engagement", the Asset Owner Division gives mandate to Eurizon (within the Asset Management Division) for their engagement activities. For this reason, for full details of engagement communication please refer to . Please note that the Engagement Policy is public on the Website: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ECSGR_EngagementPolicy.pdf. Eurizon actively monitors corporate events connected to the financial instruments in the portfolio of managed UCIs, where required by the characteristics of the instruments that incorporate rights to be exercised. To identify issues in advance, while minimising any potential loss of value arising from aspects related to the performance of the companies in which it invests on behalf of the managed assets, as well as any major negative effects of investment decisions, Eurizon identified three main stages of the engagement activities adopted with investee issuers: (i) PREPARATION: identification of issuers to be contacted, also according to the "macro-themes" of interest to the Company; analysis of available public material to identify the focus of the dialogue; (ii) EXECUTION: Launch of engagement activities with the identified company: exchanges can take place via email, virtual meetings or face-to-face meetings. Evaluation of the information acquired from the issuer and assessment of whether the engagement should be prolonged or escalation measures should be undertaken. Launch of a possible escalation process; (iii) CLOSURE: Closure of the engagement activity if the feedback

is considered satisfactory. In the event of a negative outcome of any escalation action, the Company will consider divesting the assets. The update of Net Zero engagement activities for Asset Owner Division is reported in the 2025 Intesa Sanpaolo Climate Report available to the public on the website. Climate Report: https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf.

(5.11.4.8) Attach your engagement strategy

Policy for the integration of ESG sustainability factors into the investment process.pdf

(5.11.4.9) Staff in your organization carrying out the engagement

☑ Specialized in-house engagement teams

(5.11.4.10) Roles of individuals at the portfolio organizations you seek to engage with

☑ Investor relations managers

☑ Other, please specify :Head of Sustainability dept

(5.11.4.11) Effect of engagement, including measures of success

Among the targets linked to NZAOA published by the Asset Owner Division (Intesa Sanpaolo Assicurazioni), the engagement target aims to implement specific engagement actions towards investee companies to incentivise them to undertake decarbonisation paths and progressively align to the Net Zero scenario. The 2030 target consists in bilateral discussions with the top 20 issuers, which account for about 70% of the emissions in the Insurance Group's In-Scope Portfolio, with the end aim of evaluating, discussing and enabling their respective decarbonisation pathways and strategies. In the context of this target, since joining NZAOA at the end of December 2021 up to December 2025, Intesa Sanpaolo Assicurazioni has engaged 16 issuers, accounting for 80% of the target. Measure of success and threshold: the reduction of the Portfolio in Scope's weighted average carbon intensity (WACI): Intesa Sanpaolo Assicurazioni aims to reduce the WACI of its Portfolio in Scope by 50% by 2029, to be reported in 2030 vs. Baseline Year (2021). Engagement activities supported the reduction of the Weighted Average Carbon Intensity (i.e. WACI) of the Portfolio in Scope, that dropped to 48.8 tCO2e/m in December 2025. If compared to 82.1 tCO2e/m in 2021 baseline, WACI recorded a 40.6% reduction, in line with target ambition of -50% at 2030.

(5.11.4.12) Escalation process for engagement when dialogue is failing

☑ Yes, we have an escalation process

(5.11.4.13) Describe your escalation process

As stated in the column “Explain the rationale for the coverage of your engagement”, the Asset Owner Division gives mandate to Eurizon (within the Asset Management Division) for their engagement activities. For this reason, for full details regarding escalation process please refer to . The engagement process includes a medium-term monitoring cycle aimed at assessing the progress made by issuers, with a particular focus on the 'macro-themes' identified as priorities by the Asset management Company. Such assessments typically require a timeframe of at least 18-36 months. If investee issuers do not respond constructively, the Asset Management Company will consider activating appropriate escalation processes, which may include two levels, depending on the situation: First level - increasing the frequency of contacts with the issuer; sending of formal notices to state the Asset Manager’s expectations; collaborative cooperation with other institutional investors, as outlined in Principle No. 4, for the purpose of submitting comments or specific requests for in-depth analysis of particular issues; Second level - making public statements at the General Meeting; abstaining or voting against resolutions at the General Meeting; evaluation of possible divestments of shareholdings within the ESG Committee. The escalation process is public in the Engagement policy and in the Eurizon 2025 Stewardship Report. Engagement Policy: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/ECSGR_EngagementPolicy.pdf; Stewardship Report: https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ENG/stewardship-report-eng.pdf.

(5.11.7) Provide further details of your organization’s supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

☑ Upstream value chain transparency and human rights

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to mitigate environmental impact

☑ Provide training and support for adaptation activities

Financial incentives

☑ Feature environmental performance in supplier awards scheme

Information collection

☑ Other information collection activity, please specify :mapping of qualified and active suppliers against environmental, social and governance criteria through a series of questionnaires including the ESG questionnaire.

(5.11.7.4) Upstream value chain coverage

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

☑ 100%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

☑ 100%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

In line with the 2022-2025 Business Plan, the Group set the target of mapping 100% qualified and active suppliers against environmental, social and governance criteria by 2025. Accordingly, by the end of 2025 100% of the suppliers qualified in the register and engaged had an ESG assessment. Following supplier qualification process, as part of the subsequent monitoring phase, the Group identified suppliers presenting a low ESG assessment, towards which specific engagement initiatives were directed. In particular, with the aim of mitigating the risk of suppliers failing to meet the Group's ESG requirements, in the second half of 2025 the first supplier engagement initiatives were launched, helping to increase suppliers' awareness of ESG issues. In this context, in order to raise awareness of the importance of these issues, suppliers that had obtained a low ESG rating were invited to take part in a dedicated online course which was attended by a total of 27 supplier staff. A webinar on social sustainability was also organised, aimed at 40 suppliers selected from those operating in categories considered at higher risk in terms of the protection of human rights, which was attended by a total of 57 supplier staff. From 2026, specific programmes are planned to strengthen suppliers' awareness of ESG topics.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

☑ No

(5.11.8) Provide details of any environmental smallholder engagement activity

(5.11.8.1) Commodity

☑ Other, please specify :Diversified agricultural products (Agribusiness)

(5.11.8.2) Type and details of smallholder engagement approach

Smallholder financing

☑ Financing contracts long-term

☑ Provide financial incentives for sustainable practices

☑ Use of government subsidized financing schemes

(5.11.8.3) Number of smallholders engaged

54

(5.11.8.4) Effect of engagement and measures of success

For SMEs investing in sustainability, ISP has developed several solutions such as S-Loan Progetti Green, a dedicated MLT financing solution. The latter is a facility offering discounted interest rates linked to sustainability performance, thereby encouraging practices such as precision farming, livestock management, drip irrigation, eco-forestry, and land recovery. Moreover, to support Agribusiness companies in accessing and benefiting from the funds made available under Italy's National Recovery and Resilience Plan (NRRP), ISP offers financing solutions designed to maximise the incentives available through the NRRP measures dedicated to the sector. In particular, customers applying for MTL financing for investments eligible under the NRRP Agribusiness schemes can choose from a range of dedicated products, including S-Loan Progetti Green. In 2025, ~€4.3bn of S-Loans were disbursed (€11.1bn since 2020), of which ~€2.2bn related to S-Loan Progetti Green (€2.3bn since 2024). In 2025, 54 customers benefited from this solution offered to the Agribusiness sector under the NRRP (equal to ~€45m). Volume of loans disbursed is used as the primary metric to assess the effectiveness of this engagement, as it reflects the extent to which clients are adopting sustainability-linked

financing and, in turn, investing in the sustainable practices these products are designed to incentivise. This commitment has been renewed in the 2026-2029 Business Plan, with the goal of disbursing 30% of total MTL new lending over the Plan time horizon, with a focus on social and environmental activities. ISP engages smallholders through targeted initiatives, such as the Agribusiness Department's launch, in 2025, of a €10bn intervention to support Italian agri-food SMEs. Through its Agribusiness Department, ISP is committed not only as a lender, but also as a system player, capable of creating connections, fostering investments and supporting the competitiveness of agricultural and agribusiness companies in global markets. With ~1,100 specialised professionals and 250 operating locations across Italy, the Agribusiness Department provides structured support to thousands of SMEs along the supply chain through dedicated solutions, including investment financing and a unique integrated advisory model within the Italian market. During 2025-2026, 3 Agri-Talk events were held across Italy on winery, dairy and olive oil sector, promoting dialogue with agri-food businesses on ESG transition.

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.4) % stakeholder-associated scope 3 emissions

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

INVESTORS AND FINANCIAL COMMUNITY - ESG and climate-related issues represent a strategic part of Intesa Sanpaolo institutional investors engagement, rating agencies' assessments and brokers research and analysis. In 2025 Intesa Sanpaolo has continued its interaction with ESG Investors, both through one-on-one meetings, collective engagement initiatives, ESG Conferences and through the acknowledgement of requests of formal engagement on ESG/ Climate issues by large asset managers. In 2025, the Assessments and SRI Investor Relations Team held 35 meetings with 64 ESG investor firms, including portfolio managers and buy side

analysts focusing on sustainability, involving when requested other specialised structures. Climate issues from investors have confirmed a central role in structured questionnaires and surveys, ante and post meetings. The decarbonisation path and transition finance remain among the most relevant topics discussed. Dialogue with the financial community also involves ESG Data providers and Rating agencies. In 2025 Intesa Sanpaolo participated in 23 assessments (including S&P Global CSA, CDP, Sustainalytics, MSCI, etc.) which confirmed Intesa Sanpaolo's positioning among ESG leading companies. STRATEGY FOR PRIORITISING ENGAGEMENTS - As concerns investors, proactive engagement is prioritised. As concerns assessments, as a general rule more authoritative questionnaires are prioritised but, if possible, all requests are satisfied.

(5.11.9.6) Effect of engagement and measures of success

DETAIL OF MEASURES OF SUCCESS AND POSITIVE OUTCOMES ACHIEVED - Through constant dialogue with investors and financial community, Intesa Sanpaolo is able to engage and inform top management on market sentiment on the Bank's climate strategy, confirming the strategy adopted. Moreover, engagement with investors determines the success of green bond placements on the market. For instance, in the April 2024 green bond issuance, ESG investors represented more than 85% of all investors. As concerns the result of assessments, Intesa Sanpaolo has been rewarded with a positioning among leaders in the main ESG indexes. Specifically, in 2025 ISP was the only Italian banking Group included in the Dow Jones Best-in-Class Indices (Europe and World). Intesa Sanpaolo was also included in the CDP Climate A List, and in the 2025 ESG Industry and Regional Top-Rated Companies List by Sustainalytics. Furthermore, in 2025 Intesa Sanpaolo was recognised by Sustainalytics as a Low Carbon Leader, across three categories: 'Global 100 Top Rated', 'Regional Top Rated', 'Industry Top Rated' highlighting the Intesa Sanpaolo's leading position in climate transition management.

Climate change

(5.11.9.1) Type of stakeholder

☑ Other value chain stakeholder, please specify :Employees

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

☑ Other education/information sharing, please specify :Training courses on the Group commitments

(5.11.9.4) % stakeholder-associated scope 3 emissions

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Rationale and scope - According to the ISP's Code of Ethics, which must be respected by all employees, among others the Group commits to Environmental protection "We promote efficient and conscious use of all resources, avoiding waste and always favouring sustainable choices over time. We are committed to combating climate change, protecting nature and biodiversity, and supporting the transition to a sustainable, green and circular economy". The Group provides all staff with access to ESG training through a Training Plan structured on two levels: a base level, cutting across the various issues and delivered to all employees and an in-depth or specialist level, on individual issues. The main tool used for sharing content on ESG/environmental topics is the multimedia platform Apprendo. In 2025 the Group's total number of participants to ESG training was about 87,592 (96.5% of the total number of employees) for a total of over 1,000,000 hours. Specific Learning Objects were dedicated to environmental and climate change topics such as Net Zero, circular economy, energy transition, decarbonisation and renewable energy and environmental protection. Over 65,400 participants completed these learning objects for around 73,500 training hours. Moreover, specific courses are compulsory for staff directly involved in the application of Environmental and Energy Management Systems. In addition, in 2025 the updated version of the mandatory training programme on environmental protection (Environmental Protection – Activities, Practices and Behaviours) was published in order to illustrate appropriate technical tools and provide useful information for the correct completion of the special waste identification and management form (nearly 64,850 employees attended as at 31.12.2025).

(5.11.9.6) Effect of engagement and measures of success

Employee engagement and their active involvement are undoubtedly factors in achieving decarbonisation goals. Over the course of 2025, Intesa Sanpaolo achieved important results and advanced its climate objectives. Thanks to the different actions enacted to reduce environmental impacts the Group own emissions have dropped by 5.6% in 2025 vs 2024. Results for 2025 show a decrease in absolute financed emissions for sectors covered by target setting by 12% compared to 2024 data, by 26% compared to 2023 and by 41% compared to 2022 data.

(5.14) Do your external asset managers have to meet environmental requirements as part of your organization's selection process and engagement?

	External asset managers have to meet specific environmental requirements as part of the selection process and engagement	Policy in place for addressing external asset manager non-compliance
	☑ Yes	☑ Yes, we have a policy in place for addressing non-compliance

(5.14.1) Provide details of the environmental requirements that external asset managers have to meet as part of your organization's selection process and engagement.

(5.14.1.1) Environmental issues covered by the requirement

☑ Climate change

(5.14.1.2) Coverage

☑ All assets managed externally

(5.14.1.3) Environmental requirement that external asset managers have to meet

☑ Offering environmentally sustainable products and services

(5.14.1.4) Mechanisms used to include environmental requirement in external asset manager selection

☑ Review investment manager's environmental policies
☑ Include environmental requirements in investment mandates
☑ Include environmental requirements in requests for proposals
☑ Include environmental requirements in performance indicators and incentive structures
☑ Publish requirements of external investment managers in relation to environmental issues
☑ Preference for investment managers with an offering of funds resilient to environmental issues
☑ Review investment manager's environmental performance (e.g., active ownership, proxy voting records, under-weighting in high impact activities)

(5.14.1.5) Response to external asset manager non-compliance with environmental requirement

☑ Retain and engage

(5.14.1.6) % of non-compliant external asset managers engaged

☑ Unknown

(5.15) Does your organization exercise voting rights as a shareholder on environmental issues?

	Exercise voting rights as a shareholder on environmental issues
	☑ Yes

(5.15.1) Provide details of your shareholder voting record on environmental issues.

(5.15.1.1) Method used to exercise your voting rights as a shareholder

☑ Exercise voting rights directly

(5.15.1.3) % of voting rights exercised

100

(5.15.1.4) % of voting which is publicly available

100

(5.15.1.5) Environmental issues covered in shareholder voting

☑ Climate change

☑ Forests
☑ Water

(5.15.1.6) Global environmental commitments that your shareholder voting is aligned with

☑ Aligned with the Paris Agreement
☑ Aligned with the Kunming-Montreal Global Biodiversity Framework
☑ Aligned with Sustainable Development Goal 6 on Clean Water and Sanitation
☑ Aligned with another global environmental commitment, please specify :UN Principles for Responsible Investment; International Corporate Governance Network; Net Zero Investment Framework (NZIF); Assogestioni's Stewardship Principle

(5.15.1.7) Issues supported in shareholder resolutions

☑ Reduce water pollution
☑ Climate transition plans
☑ Improve water efficiency
☑ Environmental disclosures
☑ Net zero emissions by 2050
☑ Reduce water withdrawal and/or consumption
☑ Halting deforestation and/or conversion of natural ecosystems
☑ Water, Sanitation and Hygiene (WASH) provisions for all employees
☑ Emissions reduction targets
☑ Elimination of hazardous chemicals
☑ Phase out of fossil fuel financing
☑ Board oversight of environmental issues
☑ Aligning public policy position (lobbying)
☑ Other, please specify **:Adopt GHG Emissions Reduction Targets, Report on Climate Change Lobbying, Report on Climate change mitigation and adaptation, Report on biodiversity risk, impacts and dependencies, Report on "Just Transition"**

C6. Environmental performance - Consolidation approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used	Provide the rationale for the choice of consolidation approach
Climate change	☑ Financial control	*The 2025 Annual Report and 2025 Climate Report are consolidated following a financial control approach.*
Forests	☑ Financial control	*The 2025 Annual Report and 2025 Climate Report are consolidated following a financial control approach.*
Water	☑ Financial control	*The 2025 Annual Report and 2025 Climate Report are consolidated following a financial control approach.*
Biodiversity	☑ Financial control	*The 2025 Annual Report and 2025 Climate Report are consolidated following a financial control approach.*

C7. Environmental performance - Climate change

(7.1) Is this your first year of reporting emissions data to CDP?

☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	☑ No

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	☑ No

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

☑ ABI Energia Linee Guida
☑ IEA CO2 Emissions from Fuel Combustion
☑ The Greenhouse Gas Protocol: Scope 2 Guidance
☑ US EPA Emissions & Generation Resource Integrated Database (eGRID)
☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
☑ US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity
☑ US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources
☑ Other, please specify :UNFCCC: United Nations Framework Convention on Climate Change

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	☑ We are reporting a Scope 2, location-based figure	☑ We are reporting a Scope 2, market-based figure	*Intesa Sanpaolo reports Scope 2 emissions according to GHG Protocol Scope 2 Guidance.*

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are excluded from your disclosure of climate-related data?

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions which are not included in your disclosure.

(7.4.1.1) Source of excluded emissions

Geographic region (only Italy included)

(7.4.1.2) Scope(s) or Scope 3 category(ies)

☑ Scope 3: Employee commuting

(7.4.1.6) Relevance of Scope 3 emissions from this source

☑ Emissions are not relevant

(7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

10.6

(7.4.1.10) Explain why this source is excluded

Intesa Sanpaolo has focused the analysis on the Italian perimeter which represents about 74% of total workforce.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Proportional to workforce included in scope 3 Employee commuting.

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

60391.63

(7.5.3) Methodological details

According to the GHG Protocol and others as reported in 7.2: ABI Energia Linee Guida; IEA CO2 Emissions from Fuel Combustion; The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition); The Greenhouse Gas Protocol: Scope 2 Guidance; The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard; US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity; US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources; US EPA Emissions & Generation Resource Integrated Database (eGRID); UNFCCC: United Nations Framework Convention on Climate Change.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

180875.98

(7.5.3) Methodological details

According to the GHG Protocol and others as reported in 7.2: ABI Energia Linee Guida; IEA CO2 Emissions from Fuel Combustion; The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition); The Greenhouse Gas Protocol: Scope 2 Guidance; The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard; US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity; US EPA Center for Corporate Climate

Leadership: Direct Emissions from Stationary Combustion Sources; US EPA Emissions & Generation Resource Integrated Database (eGRID); UNFCCC: United Nations Framework Convention on Climate Change.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

35800.81

(7.5.3) Methodological details

According to the GHG Protocol and others as reported in 7.2: ABI Energia Linee Guida; IEA CO2 Emissions from Fuel Combustion; The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition); The Greenhouse Gas Protocol: Scope 2 Guidance; The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard; US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity; US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources; US EPA Emissions & Generation Resource Integrated Database (eGRID); UNFCCC: United Nations Framework Convention on Climate Change.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2025

(7.5.2) Base year emissions (metric tons CO2e)

9868.02

(7.5.3) Methodological details

Scope 3 - category 1 Purchases of goods and services include: - the paper used in office activities. The processes considered are those from production to delivery to the Group. Emissions from production are an average sector scenario, derived from the UK government's greenhouse gas reporting conversion factors. For all residual processes included in the system boundaries, GHG emission factors have been sourced from Ecoinvent 3.11, compared to Ecoinvent 3.5 used in 2024; - the

use of cloud-based data centre services. Scope 1, 2, 3 annual emissions reported by suppliers, in relation to the services offered to the Group, are considered; - toner used in the Group's printing operations. Processes from production to delivery to the Bank are considered. Greenhouse gas emission factors were sourced from Ecoinvent 3.11; - water consumption in the Group's operations. The final treatment and purification stages are not considered in the emissions calculation, which is carried out by applying an emission factor derived from the UK Government's Department for Energy Security and Net Zero (DESNZ) dataset.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

36103.68

(7.5.3) Methodological details

Accounted capital goods include the most relevant IT equipment and electronics purchased by Intesa Sanpaolo over the reporting year: desktop computers, laptops, LCD screens, printers, copying machines, scanners, mobile telephones, accessories (e.g. headphones), projectors, tablets and automated teller machines (ATM). The system boundaries include cradle-to-gate operations, i.e. the entire products supply chain until they are delivered to Intesa Sanpaolo. According to the GHG Protocol Scope 3 Emission Standard (WBCSD/WRI), emissions generated from capital goods manufacturing are totally accounted in the purchasing year, irrespective of the product service life. Emission factors have been sourced wherever possible from publicly available primary data, such as LCA reports, Environmental Product Declaration (EPDs) or sustainability reports from manufacturing corporates. This was for instance the case of Lenovo or Apple computers or Apple mobile telephones and tablets. For the remaining products, emission factors from Ecoinvent 3.5 (www.ecoinvent.org) datasets with a satisfactory representativeness have been applied. Transportation distances from the manufacturing countries - mostly China and other Eastern Asia countries have been taken into account. ATM machines have been modelled based on their average Bill-of-Materials and the use of corresponding Ecoinvent datasets. The IPCC 2013 equivalence factors have been applied.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

31236.12

(7.5.3) Methodological details

In 2017, Intesa Sanpaolo extended Scope 3 accounting to the company energy system. In accordance with the GHG protocol, Scope 3 emissions related to energy supply include fuel supply chain, infrastructure construction and operation, distribution and transmission losses. Energy consumption, divided by source (e.g. fossil, renewable) and type (electricity, heat), was collected for Italy and foreign banks. Where possible, regionalised data have been used to characterise the impacts of energy carriers (e.g. natural gas). Otherwise, average European/world scenarios have been applied. If available, Country-specific residual electricity mixes were used as reference for electricity consumption, otherwise average national electricity mixes have been used. Emission factors from Ecoinvent 3.5 (www.ecoinvent.org) have been used. The IPCC 2013 equivalence factors have been applied.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2025

(7.5.2) Base year emissions (metric tons CO2e)

16726.32

(7.5.3) Methodological details

Scope 3 – category 4. With respect to upstream transport and distribution, the emissions generated by the transport of money to replenish ATMs by third-party companies on behalf of the Group were considered. Unlike in 2024, when van mileage had been statistically estimated, a representative sample of refuelling events involving different types of vehicles and related distances travelled was used in 2025 to better model the system. Emissions cover all stages of the life cycle: fuel supply chain, combustion emissions and vehicle manufacture. Ecoinvent 3.11 emission factors were used, compared to the Ecoinvent 3.5 version used in 2024.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

316.88

(7.5.3) Methodological details

The system boundaries include the end-of-life treatment of special waste generated throughout Intesa Sanpaolo's operations in the reporting year, from corporate headquarters as well as Italian and foreign branches. The most important waste categories, according to the EWC classification are packaging waste, electronic waste, exhausted toners and waste from demolition and construction activities. Household waste generated by employees in office activities have been excluded from the analysis. The phases under assessment include waste transportation to the treatment facilities and end-of-life treatment. Information on the actual end-of-life treatment have been sourced from the official waste registers that are filled according to the Italian waste regulations. According to the GHG Protocol Scope 3 Emission Standard (WBCSD/WRI), emissions from waste recycling processes as well as avoided emissions from substituted materials are set to zero, hence for waste flows sent to recycling, which are the major share of waste produced by Intesa Sanpaolo, only transportation emissions have been accounted. For the remaining waste flows sent to landfill, incineration or other treatment processes, representative emission factors from Ecoinvent 3.5 (www.ecoinvent.org) have been used. The IPCC 2013 equivalence factors have been applied.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

12917.41

(7.5.3) Methodological details

Intesa Sanpaolo reports the business travel emissions arising from train, airplanes and personal cars. The model of data reporting adopted is designed in accordance with the GRI reporting standards and guidelines of ABIenergia for the application of the GRI environmental indicators in the banking sector. The model allows for an analysis of mobility useful for the definition of actions and policies that, with regard also to the profiles of economic sustainability, may reduce CO2 emissions. Taking into account the specificity of Mobility Management in Intesa Sanpaolo a set of indicators related to corporate mobility has been defined, that allows to address new GRI requests with regard to issues of mobility and adequately monitors them over time. Also, the emission factor applied and the GWP values used to calculate emissions are included in these guidelines. The model is based on data related to the vectors used, transfers and video conferencing and data obtained through the application of appropriate coefficients.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

54275.33

(7.5.3) Methodological details

In 2013 Intesa Sanpaolo started to calculate emission from employees commuting. For 2021 ISP has calculated emissions from employee commuting in Italy with the data derived from the questionnaire submitted to its employees (about 24,000 employees from 27 areas in Italy). Starting from the primary data the Group has applied the emission factor used for the 2021 Intesa Sanpaolo Consolidated Non-Financial Statement and properly integrated with the necessary data from other sources. Public transportation and shuttles, motorcycles, personal cars and train have been considered.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2025

(7.5.2) Base year emissions (metric tons CO2e)

1021.97

(7.5.3) Methodological details

Scope 3 – category 8. The Intesa Sanpaolo Group has buildings leased by third parties which are used as guest houses. For this type of buildings, the Group adopted a more specific methodology during 2025, in line with the actual intended use of the property and using specific factors correlated to the residential sector. In particular, the methodology applied to calculate emissions in 2025 uses CO2eq/m2 emissions intensity factors specific to properties intended for residential use, sourced from the Pathway of the Carbon Risk Real Estate Monitor (CRREM), with reference to multi-family residential buildings. Unlike the methodology applied in 2025, in 2024 the Group used an approximation of unit emissions for these types of asset, aligning them with those of assets under operational control.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

212.88

(7.5.3) Methodological details

In 2014 Intesa Sanpaolo started calculating emissions from internet banking operations in Italy. The most relevant operations were collected and classified with a twofold approach: type of operation (payment, transfer) and platform (mobile, PC). The following information was also needed to perform the evaluation: time for each operation, average electricity consumption for PC and mobile devices and emission factors for electricity consumption. Operation time was estimated through expert judgment. Average electricity consumption for mobile and PC was retrieved from publicly available studies. In 2016, the study was extended to most of the foreign banks, adopting the same approach and boundary definition. In 2018 the study has been further expanded to include a larger share of foreign banks. The same boundary has been confirmed for 2022 and 2023 assessment. If available, country-specific residual electricity mixes were used as reference for electricity consumption, otherwise average national electricity mixes have been used. Emission factors were sourced from Ecoinvent 3.8 (www.ecoinvent.org). These emissions cover a scope 3 according to the GHG Protocol, including all the relevant life cycle stages from fuel supply chain to transmission losses.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2025

(7.5.2) Base year emissions (metric tons CO2e)

2707.5

(7.5.3) Methodological details

Scope 3 – category 13. The Intesa Sanpaolo Group owns buildings that do not fall within the Group's core business (properties classified under IAS 40) over which it does not have operational control, as adequately reported. The methodology applied to category 8 has changed compared to 2024. Further details can be found in

category 8. In 2025, emissions intensity factors are sourced from the Pathway of the Carbon Risk Real Estate Monitor (CRREM) foundation, with reference, in this case, to “office” buildings.

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

43592.22

(7.6.3) Methodological details

According to the GHG Protocol and others as reported in 7.2: ABI Energia Linee Guida; IEA CO2 Emissions from Fuel Combustion; The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition); The Greenhouse Gas Protocol: Scope 2 Guidance; The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard; US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity; US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources; US EPA Emissions & Generation Resource Integrated Database (eGRID); UNFCCC: United Nations Framework Convention on Climate Change.

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

97049.19

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

14890.53

(7.7.4) Methodological details

According to the GHG Protocol and others as reported in 7.2: ABI Energia Linee Guida; IEA CO2 Emissions from Fuel Combustion; The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition); The Greenhouse Gas Protocol: Scope 2 Guidance; The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard; US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity; US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources; US EPA Emissions & Generation Resource Integrated Database (eGRID); UNFCCC: United Nations Framework Convention on Climate Change.

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

9868.02

(7.8.3) Emissions calculation methodology

☑ Average data method

☑ Supplier-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

45.7

(7.8.6) Please explain

Scope 3 - category 1. Purchases of goods and services include: - the paper used in office activities. The processes considered are those from production to delivery to the Group. Emissions from production are an average sector scenario, derived from the UK government's greenhouse gas reporting conversion factors. For all residual processes included in the system boundaries, GHG emission factors have been sourced from Ecoinvent 3.11, compared to Ecoinvent 3.5 used in 2024; - the use of cloud-based data centre services. Scope 1, 2, 3 annual emissions reported by suppliers, in relation to the services offered to the Group, are considered; - toner used in the Group's printing operations. Processes from production to delivery to the Bank are considered. Greenhouse gas emission factors were sourced from Ecoinvent 3.11; - water consumption in the Group's operations. The final treatment and purification stages are not considered in the emissions calculation, which is carried out by applying an emission factor derived from the UK Government's Department for Energy Security and Net Zero (DESNZ) dataset.

Capital goods

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

7256.54

(7.8.3) Emissions calculation methodology

☑ Hybrid method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

42.9

(7.8.6) Please explain

Scope 3 – category 2. Capital goods include the most significant IT and electronic equipment purchased by the Group during the reporting year: PCs and laptops, monitors, printers, smartphones, tablets, ATMs, etc.. The system boundaries include cradle-to-gate operations, i.e. the entire product supply chain. In accordance with the GHG Scope 3 Emission Standard (WBCSD/WRI) protocol, emissions generated by the production of capital goods are entirely recognised when purchased, regardless of the lifetime of the product. Emission factors were sourced, where possible, from publicly available primary data, such as Life Cycle Assessment (LCA)

reports, Environmental Product Declarations (EPDs), manufacturers' sustainability reports or, alternatively, for the remaining products, emission factors from the Ecoinvent 3.11 datasets (compared to Ecoinvent 3.5 used in 2024) with satisfactory representativeness were applied. Transport distances from production countries, mainly China and other East Asian countries, were considered. ATM machines were modelled based on the percentages of the materials they are composed of and the use of the corresponding Ecoinvent datasets. The IPCC 2021 equivalence factors have been applied, compared to the IPCC 2013 factors used in 2024.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

23615.49

(7.8.3) Emissions calculation methodology

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 3. The energy vector indicator of the Group's energy consumption includes emissions related to the fuel supply chain, construction and operation of infrastructure, distribution and transmission losses. − In order to characterise impacts, where possible, regional data were used or average European/world-wide scenarios. With respect to electricity consumption, country-specific “residual mixes” were used, where available, or “national mixes”. Accordingly, in 2025, emission factors provided by various sources were used, namely the International Energy Agency (IEA) for average mixes, the Association of Issuing Bodies (AIB) for residual mixes and the Ecoinvent 3.11 dataset, except for the national energy mix sourced from Ecoinvent 3.12 (Ecoinvent 3.5 was used in 2024). The IPCC 2021 equivalence factors have been applied, compared to the IPCC 2013 factors used in 2024.

Upstream transportation and distribution

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

16726.32

(7.8.3) Emissions calculation methodology

☑ Distance-based method
☑ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 4. With respect to upstream transport and distribution, the emissions generated by the transport of money to replenish ATMs by third-party companies on behalf of the Group were considered. − Unlike in 2024, when van mileage had been statistically estimated, a representative sample of refuelling events involving different types of vehicles and related distances travelled was used in 2025 to better model the system. Emissions cover all stages of the life cycle: fuel supply chain, combustion emissions and vehicle manufacture. Ecoinvent 3.11 emission factors were used, compared to the Ecoinvent 3.5 version used in 2024.

Waste generated in operations

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

601.92

(7.8.3) Emissions calculation methodology

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 5. Waste-related emissions include the end-of-life treatment of special waste generated for the Group's operations. The stages considered include the transport of waste to treatment facilities and the end-of-life treatment. Information on the effective end-of-life was sourced from the Waste Identification Forms completed in accordance with the applicable Italian legislation and from specific questionnaires provided for foreign companies. With respect to the remaining waste streams sent to landfill, incineration or other treatment processes, Ecoinvent 3.11 emission factors were used, compared to Ecoinvent 3.5 used in 2024. The IPCC 2021 equivalence factors have been applied, compared to the IPCC 2013 factors used in 2024.

Business travel

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

6330.2

(7.8.3) Emissions calculation methodology

☑ Distance-based method
☑ Fuel-based method
☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 6. Emissions related to business travel include journeys made by aircraft, trains and personal cars by employees. The methodology used to calculate emissions, in accordance with the ABI Guidelines, is based on data obtained by applying appropriate ratios derived from the ICAO's Carbon Emission Calculator, the EcoPassenger application and ISPRA's National Information System.

Employee commuting

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

35396.12

(7.8.3) Emissions calculation methodology

☑ Average data method
☑ Distance-based method
☑ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 7. Emissions due to employees' commuting are calculated, for Italy, using the data obtained from specific questionnaires sent to employees that operate in cities covered by Commuting Plans and subsequently remeasured against the total number of Group employees in Italy. Using the primary data, specific emission factors are applied, as extracted from the DESNZ database. Public transport and shuttles, motorbikes, private cars and trains were considered.

Upstream leased assets

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1021.97

(7.8.3) Emissions calculation methodology

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 8. The Intesa Sanpaolo Group has buildings leased by third parties which are used as guest houses. For this type of buildings, the Group adopted a more specific methodology during 2025, in line with the actual intended use of the property and using specific factors correlated to the residential sector. In particular, the methodology applied to calculate emissions in 2025 uses CO2eq/m2 emissions intensity factors specific to properties intended for residential use,

sourced from the Pathway of the Carbon Risk Real Estate Monitor (CRREM), with reference to multi-family residential buildings. Unlike the methodology applied in 2025, in 2024 the Group used an approximation of unit emissions for these types of asset, aligning them with those of assets under operational control.

Downstream transportation and distribution

(7.8.1) Evaluation status

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Scope 3 – category 9 "Downstream transportation", as the Intesa Sanpaolo Group does not produce goods that require transport and distribution.

Processing of sold products

(7.8.1) Evaluation status

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Scope 3 – category 10 "Processing of sold products", as there are no intermediate products that require further processing, transformation or inclusion in another product before use.

Use of sold products

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

256.23

(7.8.3) Emissions calculation methodology

☑ Methodology for indirect use phase emissions, please specify :Average time and average electricity consumption for each operation broken down by type of device used. The operating time was estimated, while the average electricity consumption for mobile devices and PCs was based on sector studies

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 11. With respect to the banking/financial services/products used by customers, the main transactions were considered, broken down by channel used (internet banking/mobile banking), type (payment/transfer) for Group banks. The following information was considered for assessment purposes: average time and average electricity consumption for each operation broken down by type of device used. The operating time was estimated, while the average electricity consumption for mobile devices and PCs was based on sector studies. The emission factors for electricity consumption are those used for Scope 2 calculation purposes.

End of life treatment of sold products

(7.8.1) Evaluation status

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Scope 3 – category 12 “End-of-life treatment of sold products”, as the Intesa Sanpaolo Group does not produce goods that require end-of-life treatment.

Downstream leased assets

(7.8.1) Evaluation status

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2707.5

(7.8.3) Emissions calculation methodology

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 – category 13. The Intesa Sanpaolo Group owns buildings that do not fall within the Group's core business (properties classified under IAS 40) over which it does not have operational control, as adequately reported. The methodology applied to category 8 has changed compared to 2024. Further details can be found in category 8. In 2025, emissions intensity factors are sourced from the Pathway of the Carbon Risk Real Estate Monitor (CRREM) foundation, with reference, in this case, to "office" buildings.

Franchises

(7.8.1) Evaluation status

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

☑ Not applicable to our organization's activities

(7.8.6) Please explain

Scope 3 – category 14 "Franchises", as the Group does not grant third party companies licences to sell or distribute its services.

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	☑ Third-party verification or assurance process in place
Scope 3	☑ Third-party verification or assurance process in place

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

(7.9.1.1) Verification or assurance cycle in place

☑ Annual process

(7.9.1.2) Status in the current reporting year

☑ Complete

(7.9.1.3) Type of verification or assurance

☑ Limited assurance

(7.9.1.4) Attach the statement

ISP Verification letter + Annual Report + Climate Report.pdf

(7.9.1.5) Page/section reference

The PDF attached is the merge of: Auditor statement (p.1-2), 2025 Annual report (p.3-1128) and 2025 Climate Report (p.1129-1318). The pages indicated in brackets refer to the PDF. a) Auditor statement: p.1-2; b) 2025 Annual report: Scope 1,2,3 - p.207 (p.211 in the merged file) and independent auditors' report p.805-810 (p.809-814); c) 2025 Climate Report: Scope 1,2,3 - p.109 (p.1237) and independent auditors' report p.186-188 (p.1314-1316).

(7.9.1.6) Relevant standard

☑ European Sustainability Reporting Standards (ESRS)
☑ ISAE3000

(7.9.1.7) Proportion of reported emissions verified (%)

100

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

(7.9.2.1) Scope 2 approach

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

☑ Annual process

(7.9.2.3) Status in the current reporting year

☑ Complete

(7.9.2.4) Type of verification or assurance

☑ Limited assurance

(7.9.2.5) Attach the statement

ISP Verification letter + Annual Report + Climate Report.pdf

(7.9.2.6) Page/ section reference

The PDF attached is the merge of: Auditor statement (p.1-2), 2025 Annual report (p.3-1128) and 2025 Climate Report (p.1129-1318). The pages indicated in brackets refer to the PDF. a) Auditor statement: p.1-2; b) 2025 Annual report: Scope 1,2,3 - p.207 (p.211 in the merged file) and independent auditors' report p.805-810 (p.809-814); c) 2025 Climate Report: Scope 1,2,3 - p.109 (p.1237) and independent auditors' report p.186-188 (p.1314-1316).

(7.9.2.7) Relevant standard

☑ European Sustainability Reporting Standards (ESRS)
☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

(7.9.2.1) Scope 2 approach

☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

☑ Annual process

(7.9.2.3) Status in the current reporting year

☑ Complete

(7.9.2.4) Type of verification or assurance

☑ Limited assurance

(7.9.2.5) Attach the statement

ISP Verification letter + Annual Report + Climate Report.pdf

(7.9.2.6) Page/ section reference

The PDF attached is the merge of: Auditor statement (p.1-2), 2025 Annual report (p.3-1128) and 2025 Climate Report (p.1129-1318). The pages indicated in brackets refer to the PDF. a) Auditor statement: p.1-2; b) 2025 Annual report: Scope 1,2,3 - p.207 (p.211 in the merged file) and independent auditors' report p.805-810 (p.809-814); c) 2025 Climate Report: Scope 1,2,3 - p.109 (p.1237) and independent auditors' report p.186-188 (p.1314-1316).

(7.9.2.7) Relevant standard

☑ European Sustainability Reporting Standards (ESRS)
☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

(7.9.3.1) Scope 3 category

☑ Scope 3: Capital goods
☑ Scope 3: Business travel
☑ Scope 3: Employee commuting
☑ Scope 3: Use of sold products
☑ Scope 3: Upstream leased assets
☑ Scope 3: Downstream leased assets
☑ Scope 3: Purchased goods and services
☑ Scope 3: Waste generated in operations
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

☑ Annual process

(7.9.3.3) Status in the current reporting year

☑ Complete

(7.9.3.4) Type of verification or assurance

☑ Limited assurance

(7.9.3.5) Attach the statement

ISP Verification letter + Annual Report + Climate Report.pdf

(7.9.3.6) Page/section reference

The PDF doc merges the Auditor statement (p.1-2), 2025 Annual report (p.3-1128) and 2025 Climate Report (p.1129-1318). The pages indicated in brackets refer to the PDF. Auditor statement: p.1-2. 2025 Annual report: p.207 (page 211 in PDF) and independent auditors' report p.805-810 (p.809-814). 2025 Climate Report: p.109 (p.1237) and independent auditors' report p.186-188 (p.1314-1316). Scope 3 emissions cat. 1,2,3,4,5,6,7,8,11,13 correspond to those selected in column 1

(7.9.3.7) Relevant standard

☑ European Sustainability Reporting Standards (ESRS)

☑ ISAE3000

(7.9.3.8) Proportion of selected emissions categories verified (%)

100

(7.9.3.9) Proportion of total reported scope 3 emissions verified (%)

1

(7.9.3.1) Scope 3 category

☑ Scope 3: Investments

(7.9.3.2) Verification or assurance cycle in place

☑ Annual process

(7.9.3.3) Status in the current reporting year

☑ Complete

(7.9.3.4) Type of verification or assurance

☑ Limited assurance

(7.9.3.5) Attach the statement

ISP Verification letter + Annual Report + Climate Report.pdf

(7.9.3.6) Page/section reference

The PDF doc merges the Auditor statement (p.1-2), 2025 Annual report (p.3-1128) and 2025 Climate Report (p.1129-1318). The pages indicated in brackets refer to the PDF. Auditor statement: p.1-2. 2025 Climate Report: p.123 (p.1251 in PDF) Financed Emissions (Scope 3 Cat.15) in the Banking portfolio (100% emissions reported in CDP for the Banking portfolio verified). Independent auditors' report p.186-188 (p.1314-1316 in PDF).

(7.9.3.7) Relevant standard

☑ ISAE3000

(7.9.3.8) Proportion of selected emissions categories verified (%)

100

(7.9.3.9) Proportion of total reported scope 3 emissions verified (%)

99

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

☑ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

3007.49

(7.10.1.2) Direction of change in emissions

☑ Decreased

(7.10.1.3) Emissions value (percentage)

4.9

(7.10.1.4) Please explain calculation

*In 2025, the Intesa Sanpaolo Group continued to purchase renewable energy. The data reported in the "change in emissions" column derives from additional purchases in the reporting year, also reported in section 7.55.2 (Scope 2 market-based), net of changes in emission factors. In 2025, 3,007.49 tCO2e (3,521.70 tCO2e with 2025 emission factors) were avoided thanks to additional renewable energy purchases. ISP's total Scope 1 and 2 emissions in the previous year were 61,936.34 tCO2e. This resulted in a decrease of -4.9%: (-3,007.49/61,936.34)*100 = -4.9%.*

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

2410.01

(7.10.1.2) Direction of change in emissions

☑ Decreased

(7.10.1.3) Emissions value (percentage)

3.9

(7.10.1.4) Please explain calculation

*In 2025, the Intesa Sanpaolo Group continued to implement proactive emission reduction initiatives through energy consumption optimisation actions and energy efficiency measures. The data reported in the "change in emissions" column also derives from the initiatives reported in section 7.55.2 (Scope 1 and Scope 2 market-based), net of changes in emission factors. In 2025, 2,410.01 tCO2e (2,428.00 tCO2e with 2025 emission factors) were avoided thanks to emission reduction projects. ISP's total Scope 1 and 2 emissions in the previous year were 61,936.34 tCO2e. Therefore, a decrease of -3.9% was achieved: (-2,410.01/61,936.34)*100 = -3.9%.*

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

1377.09

(7.10.1.2) Direction of change in emissions

☑ Increased

(7.10.1.3) Emissions value (percentage)

2.2

(7.10.1.4) Please explain calculation

*The Intesa Sanpaolo Group perimeter recorded an increase in 2025 compared to 2024, resulting in a corresponding rise in Scope 1 and 2 emissions. In 2025, ISP estimated an increase of 1377.09 tCO2e (1228.06 tCO2e with 2025 emission factors). ISP's total Scope 1 and 2 emissions in the previous year were 61,936.34 tCO2e. This represents an increase of 2.2%: (1377.09/61,936.34)*100 = 2.2%.*

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

462.36

(7.10.1.2) Direction of change in emissions

☑ Increased

(7.10.1.3) Emissions value (percentage)

0.7

(7.10.1.4) Please explain calculation

This increase is due to higher emission factors compared to 2024, as recommended in the ABI Guidelines “Linee Guida sull’applicazione nell’ambito dell’operatività bancaria degli European Sustainability Reporting Standard (ESRS) in materia ambientale” (Guidelines on the application of the European Sustainability Reporting

*Standards (ESRS) in environmental matters in banking operations). In 2025, an increase of 462.36 tCO2e in emissions was recorded due to the change in emission factors. ISP's total Scope 1 and 2 emissions in the previous year were 61,936.34 tCO2e. This resulted in an increase of 0.7%: (462.36/61,936.34)*100 = 0.7%.*

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

124.46

(7.10.1.2) Direction of change in emissions

☑ Increased

(7.10.1.3) Emissions value (percentage)

0.2

(7.10.1.4) Please explain calculation

*The increased use of generator sets for operational testing in 2025 compared to 2024 contributed to the increase in emissions. In 2025, ISP recorded an increase of 124.46 tCO2e (124.48 tCO2e with 2025 emission factors). ISP's total Scope 1 and 2 emissions in the previous year were 61,936.34 tCO2e. This represents an increase of 0.2%: (124.46/61,936.34)*100 = 0.2%.*

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

☑ Market-based

(7.12) Does your organization have significant land sector activities in its operations or value chain?

	Agriculture, forestry or other land sector activities	Indicate if these activities are only related to forest lands and/or non-productive, non-forest lands
	☑ Yes, in our upstream/downstream value chain	☑ No, these activities include those related to agricultural lands

(7.12.1) Which of the following land sector accounting subcategories are relevant to your organization in the reporting year?

Land use change emissions

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Land management net biogenic CO2 emissions

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Land management production emissions

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Biogenic product emissions

(7.12.1.2) Scope 2

☑ Not evaluated

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Land management CO2 removals

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Land occupation

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Land carbon leakage

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

Reversals of land management CO2 removals

(7.12.1.3) Scope 3

☑ Not evaluated

(7.12.1.4) Please explain

As part of its Sectoral Transition Plan, Intesa Sanpaolo set a 2030 interim net-zero aligned target for the Agriculture – Primary Farming lending portfolio in 2024. Based on results as at 31 December 2025, the portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO2e/€mln. In particular, the current sector target-setting methodology does not address the considerations introduced by the GHG Protocol Land Sector and Removals Standard (LSRS), published in January 2026.

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	☑ Not evaluated	☑ No

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

☑ No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

☑ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	☑ Yes
Consumption of purchased or acquired electricity	☑ Yes
Consumption of purchased or acquired heat	☑ Yes
Consumption of purchased or acquired steam	☑ No
Consumption of purchased or acquired cooling	☑ No
Generation of electricity, heat, steam, or cooling	☑ Yes

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

171640.87

(7.30.1.5) Total (renewable + non-renewable) MWh

171640.87

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

314769.89

(7.30.1.3) MWh from non-renewable sources

15553.51

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

108.4

(7.30.1.5) Total (renewable + non-renewable) MWh

330323.40

Consumption of purchased or acquired heat

(7.30.1.2) MWh from renewable sources

5359.87

(7.30.1.3) MWh from non-renewable sources

42102.52

(7.30.1.5) Total (renewable + non-renewable) MWh

47462.39

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

1426.51

(7.30.1.5) Total (renewable + non-renewable) MWh

1426.51

Total energy consumption

(7.30.1.2) MWh from renewable sources

321556.27

(7.30.1.3) MWh from non-renewable sources

229296.9

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

108.4

(7.30.1.5) Total (renewable + non-renewable) MWh

550853.17

(7.30.14) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Albania

(7.30.14.1) Consumption of purchased electricity (MWh)

2005.8

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2005.80

Australia

(7.30.14.1) Consumption of purchased electricity (MWh)

40.39

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

40.39

Bosnia and Herzegovina

(7.30.14.1) Consumption of purchased electricity (MWh)

1253.44

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

740.57

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1994.01

Brazil

(7.30.14.1) Consumption of purchased electricity (MWh)

115.03

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

115.03

China

(7.30.14.1) Consumption of purchased electricity (MWh)

110.45

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

110.45

Croatia

(7.30.14.1) Consumption of purchased electricity (MWh)

12091.37

(7.30.14.2) Consumption of self-generated electricity (MWh)

122.38

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

3967.42

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

16181.17

Egypt

(7.30.14.1) Consumption of purchased electricity (MWh)

21441.69

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

21441.69

France

(7.30.14.1) Consumption of purchased electricity (MWh)

69.68

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

69.68

Germany

(7.30.14.1) Consumption of purchased electricity (MWh)

47.16

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

47.16

Hungary

(7.30.14.1) Consumption of purchased electricity (MWh)

4922.01

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

1006.55

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

5928.56

Ireland

(7.30.14.1) Consumption of purchased electricity (MWh)

65.18

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

308.11

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

373.29

Italy

(7.30.14.1) Consumption of purchased electricity (MWh)

258401.46

(7.30.14.2) Consumption of self-generated electricity (MWh)

24995.17

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

27255.01

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

310651.64

Japan

(7.30.14.1) Consumption of purchased electricity (MWh)

55.59

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

55.59

Luxembourg

(7.30.14.1) Consumption of purchased electricity (MWh)

1054.47

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

472.88

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1527.35

Netherlands

(7.30.14.1) Consumption of purchased electricity (MWh)

15

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

15.00

Poland

(7.30.14.1) Consumption of purchased electricity (MWh)

40.64

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

32.8

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

73.44

Qatar

(7.30.14.1) Consumption of purchased electricity (MWh)

25.52

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

25.52

Republic of Moldova

(7.30.14.1) Consumption of purchased electricity (MWh)

831.78

(7.30.14.2) Consumption of self-generated electricity (MWh)

59.62

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

49.76

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

941.16

Romania

(7.30.14.1) Consumption of purchased electricity (MWh)

3567.61

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

784.22

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

4351.83

Russian Federation

(7.30.14.1) Consumption of purchased electricity (MWh)

1559.05

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

1289.77

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2848.82

Serbia

(7.30.14.1) Consumption of purchased electricity (MWh)

8096.94

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

3712.23

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

11809.17

Singapore

(7.30.14.1) Consumption of purchased electricity (MWh)

54.43

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

54.43

Slovakia

(7.30.14.1) Consumption of purchased electricity (MWh)

7163.02

(7.30.14.2) Consumption of self-generated electricity (MWh)

66.31

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

6171.46

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

13400.79

Slovenia

(7.30.14.1) Consumption of purchased electricity (MWh)

2260.51

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

446.34

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2706.85

Spain

(7.30.14.1) Consumption of purchased electricity (MWh)

54.65

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

25.38

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

80.03

Switzerland

(7.30.14.1) Consumption of purchased electricity (MWh)

457.84

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

509.81

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

967.65

Türkiye

(7.30.14.1) Consumption of purchased electricity (MWh)

127.52

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

39.84

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

167.36

Ukraine

(7.30.14.1) Consumption of purchased electricity (MWh)

1012.92

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

649.79

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1662.71

United Arab Emirates

(7.30.14.1) Consumption of purchased electricity (MWh)

299.21

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

299.21

United Kingdom

(7.30.14.1) Consumption of purchased electricity (MWh)

1365.86

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1365.86

United States of America

(7.30.14.1) Consumption of purchased electricity (MWh)

1717.17

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0.45

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1717.62

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

(7.45.1) Intensity figure

0.0000021446

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

58482.75

(7.45.3) Metric denominator

☑ unit total revenue

(7.45.4) Metric denominator: Unit total

27270000000

(7.45.5) Scope 2 figure used

☑ Market-based

(7.45.6) % change from previous year

6.14

(7.45.7) Direction of change

☑ Decreased

(7.45.8) Reasons for change

☑ Change in renewable energy consumption

☑ Other emissions reduction activities

(7.45.9) Please explain

The intensity figure per unit total revenue (total operating income) in 2024 was 0.0000022849. The decrease of the intensity figure is due to a decrease of CO2 emissions. Degree to which different factors have influenced the decrease: - 90% Gross global combined Scope 1 and 2 emissions; - 10% total operating income accounts. Compared to 2024, Scope 1 and Scope 2 Market-Based greenhouse gas emissions decreased by 5.6% in 2025, as a result of the Own Emissions Plans and related decarbonisation activities. This decrease was driven by reduced emissions related to fossil-based electricity, F-GAS losses, fleet fossil fuels and natural gas for heating, as well as increased procurement of electricity from renewable sources. Scope 1 data in 2024: 45,280 metric tonnes CO2e (2025 vs 2024 -3.7%). Scope 2 market-based data in 2024: 16,656 metric tonnes CO2e (2024 vs 2025 -10.6%). In 2025 the reduction in energy consumption, particularly that related to fossil fuels, has continued (-2.6% compared to 2024). Both fossil-based electricity and natural gas consumption for self and condominium heating has decreased. With reference to the fleet-related energy consumption, there was a reduction in fossil fuel use in favour of renewable electric charging.

(7.52) Provide any additional climate-related metrics relevant to your business.

(7.52.1) Description

☑ Energy usage

(7.52.2) Metric value

5.7

(7.52.3) Metric numerator

MWh of energy consumption

(7.52.4) Metric denominator (intensity metric only)

Operator

(7.52.5) % change from previous year

0.04

(7.52.6) Direction of change

☑ Decreased

(7.52.7) Please explain

In 2025, the Intesa Sanpaolo Group's energy consumption continued to fall (-2.55% compared with 2024), particularly that linked to fossil fuels. Total energy consumption per employee fell by 0.04%, in line with the reduction in the number of employees. The Group continued to reduce its electricity consumption, which fell by 3.2% compared with the previous year, thanks to energy efficiency and optimisation measures (also described in detail in response 7.55.2, relating to energy efficiency in buildings) and the reorganisation of the sales network. As regards energy consumption linked to the vehicle fleet, there was a reduction in the use of fossil fuels in favour of electric charging from renewable sources.

(7.52.1) Description

☑ Other, please specify :Paper

(7.52.2) Metric value

34.41

(7.52.3) Metric numerator

Kilograms of paper

(7.52.4) Metric denominator (intensity metric only)

Operator

(7.52.5) % change from previous year

7.74

(7.52.6) Direction of change

☑ Decreased

(7.52.7) Please explain

The Intesa Sanpaolo Group has long been committed to pursuing environmental sustainability goals, striving to use as few resources as possible and to minimise its environmental impact. To this end, the Group continues its virtuous approach in reducing overall paper consumption, in accordance with the Rules on Green Banking Procurement. Compared with 2024, paper usage has fallen by 10.06%, with a reduction in purchases of all types of paper (recycled, eco-sustainable, traditional) both in Italy and abroad, proof of the Group's increasing focus on its environmental impact. The figures per worker (34.4 kg in 2025 vs 37.3 kg in 2024) also underline the greater awareness of Group employees regarding the use of paper. Thanks to the various dematerialisation measures completed in the last five years, in 2025 around 1,918 tonnes of paper were saved, corresponding to 3,762 tonnes of CO2 avoided and a theoretical cost saving of around 5.4 million euro.

(7.53) Did you have an emissions target that was active in the reporting year?

☑ Absolute target
☑ Portfolio target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

(7.53.1.1) Target reference number

☑ Abs 10

(7.53.1.2) Is this a science-based target?

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

Validation-SBTi Target-language-and-summary_Intesa-Sanpaolo-S.p.A.pdf

(7.53.1.4) Target ambition

☑ 1.5°C aligned

(7.53.1.5) Date target was set

12/31/2021

(7.53.1.6) Target coverage

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

☑ Methane (CH4)
☑ Nitrous oxide (N2O)
☑ Carbon dioxide (CO2)
☑ Sulphur hexafluoride (SF6)
☑ Nitrogen trifluoride (NF3)

☑ Perfluorocarbons (PFCs)
☑ Hydrofluorocarbons (HFCs)

(7.53.1.8) Scopes

☑ Scope 1
☑ Scope 2

(7.53.1.9) Scope 2 accounting method

☑ Market-based

(7.53.1.11) End date of base year

12/31/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

60391.63

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

35800.81

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

96192.440

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

53

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

45210.447

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

43592.22

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

14890.53

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

58482.750

(7.53.1.78) Land-related emissions covered by target

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

73.97

(7.53.1.80) Target status in reporting year

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Intesa Sanpaolo Group scope 1 & 2 emissions: 100% coverage. Moreover, with regard to the methane reduction component, one of the actions envisaged in the Own Emissions Plan is the replacement of natural gas and diesel boilers with electric heat pumps. See Intesa Sanpaolo 2025 Annual Report and 2025 Climate Report.

(7.53.1.83) Target objective

As a demonstration of the strategic relevance of climate change, in 2022, with the 2022-2025 Business Plan, the Bank's commitment to contain CO2 emissions has resulted in the definition of the new Own Emissions Plan which identifies specific medium/long-term actions aimed at reducing its own Scope 1 and 2 emissions following the Science Based Targets initiative (SBTi) protocol, which requires maintaining the increase in global temperature below 1.5°C compared to pre-industrial levels, as provided for by the Paris Agreement. The 53% reduction in absolute Scope 1 and 2 emissions envisaged in the Own Emissions Plan is compliant with SBTi reduction requirement (4.2% annual linear reduction). Moreover, on 27 January 2025, the Group received the validation by SBTi of the target for the reduction of own emissions (Scope 1 + Scope 2), confirming that its level of ambition is in line with a 1.5°C pathway. See Intesa Sanpaolo 2025 Annual Report and 2025 Climate Report.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

The Group's commitment to contain its CO2 emissions takes tangible form in the "Own Emissions Plan" which identifies specific medium to long-term actions. In the Plan, targets reflect change in emission factors. In its Own Emissions Plan, the Bank identifies specific medium to long-term actions (2022-2030) aimed at reducing its consumption of natural gas, diesel and traditional electricity; for example, some of the actions envisaged in the Plan are the substitution of gas and diesel boilers with heat pumps, improvement of building insulation, the use of electric cars. The Group's strategy for reducing its Scope 1 and 2 emissions, which also takes account of the use and the composition of the company fleet with the goal of continuously improving its environmental performance in terms of emissions, already produced significant results in terms of reducing energy consumption in accordance with the objectives of the Plan. The 2025 Scope 1 and Scope 2 Market Based emissions highlight the positive results thanks to the implementation of the Own Emissions Plans and all the included decarbonisation activities, with a 5.6% reduction compared with 2024.

(7.53.1.85) Target derived using a sectoral decarbonization approach

☑ No

(7.53.1.1) Target reference number

☑ Abs 11

(7.53.1.2) Is this a science-based target?

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

☑ 1.5°C aligned

(7.53.1.5) Date target was set

12/31/2021

(7.53.1.6) Target coverage

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

☑ Methane (CH4)
☑ Nitrous oxide (N2O)
☑ Carbon dioxide (CO2)
☑ Perfluorocarbons (PFCs)
☑ Hydrofluorocarbons (HFCs)
☑ Sulphur hexafluoride (SF6)
☑ Nitrogen trifluoride (NF3)

(7.53.1.8) Scopes

☑ Scope 3

(7.53.1.10) Scope 3 categories

☑ Scope 3, Category 1 – Purchased goods and services

(7.53.1.11) End date of base year

12/31/2019

(7.53.1.14) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)

7974.4

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

7974.400

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

7974.400

(7.53.1.35) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

100

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

40

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

4784.640

(7.53.1.59) Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

4296.47

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

4296.470

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

4296.470

(7.53.1.78) Land-related emissions covered by target

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

115.30

(7.53.1.80) Target status in reporting year

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

The 2019 base year inventory of Intesa Sanpaolo Group scope 3 category 1 purchased goods & services: 6024.79 tonnes of CO2 and 100% coverage related to paper consumption. In 2025 the base year has been recalculated (7974.40 tonnes of CO2) in alignment with the emission factor calculation methodologies introduced from 2023 in the ABI Guidelines. From 2025, Scope 3 Category 1 will include, in addition to emissions arising from paper used in office activities and the use of cloud-based data centre services, emissions arising from toner used in printing operations and water consumption in the Group's activities not calculated in previous year. See Intesa Sanpaolo 2025 Annual Report and 2025 Climate Report.

(7.53.1.83) Target objective

The Intesa Sanpaolo Group has long undertaken to pursue environmental sustainability goals, striving to use as few resources as possible and to minimise its environmental impact. To this end the Group continues in the virtuous new approach in terms of reducing overall paper consumption, in accordance with the Green Banking Procurement Rules. The Bank identifies specific medium to long-term (2030 vs 2019) actions aimed at reducing emissions related to paper consumption; for example, some of the actions are: a) Dematerialisation and paperless actions; b) Use of recycled paper; c) Employees awareness around reducing paper consumption. See website https://group.intesasanpaolo.com/en/sustainability/environment/direct-environmental-impacts/greenhouse-gas-emissions/results-and-targets and see also 2025 Climate Report.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

The Intesa Sanpaolo Group has long undertaken to pursue environmental sustainability goals, striving to use as few resources as possible and to minimise its environmental impact. To this end the Group continues in the virtuous new approach in terms of reducing overall paper consumption, in accordance with the Green Banking Procurement Rules. The Bank identifies specific actions aimed at reducing emissions related to paper consumption; for example, some of the actions are: a) Dematerialisation and paperless actions; b) Use of recycled paper; c) Employees awareness around reducing paper consumption. Compared with 2024, paper usage has fallen by 10.06%, with a reduction in purchases of all types of paper (recycled, eco-sustainable, traditional) both in Italy and abroad, proof of the Group's increasing focus on its environmental impact. The figures per worker (34.4 kg in 2025 vs 37.3 kg in 2024) also underline the greater awareness of Group employees regarding the use of paper. Thanks to the various dematerialisation measures completed in the last five years, in 2025 around 1,918 tonnes of paper were saved, corresponding to 3,762 tonnes of CO2 avoided and a theoretical cost saving of around 5.4 million euro.

(7.53.1.85) Target derived using a sectoral decarbonization approach

☑ No

(7.53.4) Provide details of the climate-related targets for your portfolio.

(7.53.4.1) Target reference number

☑ Por1

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

12/31/2021

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Fossil Fuels

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans
☑ Project finance
☑ Bonds

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

44.6

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, SDA metric please specify :gCO2e

(7.53.4.17) Target denominator

☑ Other, SDA denominator please specify :MJ

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.7

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

64

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

55

(7.53.4.29) Figure in reporting year

63

(7.53.4.30) % of target achieved relative to base year

11.11111111111111

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: focus on Oil&Gas. Baseline 64 (Portfolio composition as of 30/06/21). This target was calculated on exposures as of 30/06/21 as exposures as at 31/12/21 would not have allowed enough time for calculations and targets to be published in the 2022-25 Business plan. Emissions data at 2019. 2030 Target value: 55. Metric used for target and baseline: gCO2e/MJ. Latest available Benchmark Scenario: IEA NZ Oil&Gas stand-alone 2025 (incl. methane). The benchmark was built on top of the IEA Net Zero Oil&Gas stand-alone benchmark without renewables (49 gCO2e/MJ in 2035) adding the contribution of methane emissions (2 gCO2e/MJ) and adding back the carbon captured outside of the Oil&Gas (7 gCO2e/MJ) as it is not under direct control/influence of the Oil&Gas players, driving the benchmark to 58 gCO2e/MJ in 2035. Benchmark Scenario for target setting: IEA NZ Oil&Gas stand-alone 2021 (incl. methane). Other details: Emissions coverage: Scope 1, 2 and 3. Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: short, medium and long-term loans; bonds HTC. Value chain coverage: focus on upstream operators and integrated players to encourage operational efficiency in extraction and foster companies' transition from high emitting fossil fuels to lower emitting fuels (e.g., natural gas) and renewables. Exclusion of refineries, pipelines and downstream to avoid double counting. Portfolio weighting: financed production weighted approach. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Oil&Gas: 0.7% (€3.1bn). Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. The target is covered by third party limited assurance. For further details please refer to "Oil&Gas" focus p.134 and "Methodology:Target Setting on Lending Activities" p.138-142 in the ISP 2025 Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices. As concerns SBTi, validation of targets presented in 2024 was received on 27/01/2025;Oil&Gas is included in the "Other Corporate Loans" validated target.

(7.53.4.38) Target objective

The target is in line with Intesa Sanpaolo’s commitment to accelerate the transition towards Net Zero. The Bank offers a range of financial solutions and advisory services linked to sustainable activities, designed to support clients in their Net Zero transition and decarbonisation efforts. These tailored products are distinctively designed to accompany businesses in their transition toward more sustainable models and, among others, include sustainability-linked, green and transition loans, green bond issues and project transition financing.

(7.53.4.1) Target reference number

☑ Por2

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

12/31/2023

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Power generation

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans
☑ Project finance

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

5.6

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, SDA metric please specify :KgCO2e

(7.53.4.17) Target denominator

☑ Other, SDA denominator please specify :MWh

(7.53.4.18) % of portfolio covered in relation to total portfolio value

1.8

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

202

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

110

(7.53.4.29) Figure in reporting year

108

(7.53.4.30) % of target achieved relative to base year

102.17391304347827

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Power Generation. Target revised in 2023. Target publication date: Original target published in 02/2022, revised target published in 03/2024. Metric used for target and baseline: KgCO2e/MWh. Latest available Benchmark Scenario: IEA Net Zero Scenario Benchmark (2025). Benchmark Scenario for target setting: IEA Net Zero Scenario Benchmark (2023). Originally a target was set for Power generation with baseline 30.06.21 which included short term lending and bonds HTC. In 2023 the target was revised to align with value chain choices made in view of SBTi submission. The revised target has baseline as at 31.12.22 and does not include short term loans and bonds HTC. The Group fulfilled the commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation on 27th January 2025. Other details: Emissions coverage: Scope 1 and 2. Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: Medium and long-term loans. Value chain coverage: focus on generation and integrated players to encourage generation of electricity from low emission energy sources. Exclusion of transportation and distribution to avoid double counting. Portfolio weighting: Financed production weighted approach. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Power Generation revised: 1.8% (€7.6bn). Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. The target is covered by third party limited assurance. For further details please refer to page 135 focus on "Power Generation" and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

To reduce emissions while supporting customer transition with dedicated finance, Intesa Sanpaolo has designed targeted financial solutions and advisory to businesses which are promoting clean energy and pursuing Net Zero goals. This strategy is based on: active financial support and multistakeholder engagement. Consequently, the share of green exposures within the Power Generation portfolio increased from 59% in 2024 to 62% in 2025, reflecting a strong commercial commitment to advancing Intesa Sanpaolo's support for the energy transition and a strategic focus on renewable project finance.

(7.53.4.1) Target reference number

☑ Por3

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

12/31/2023

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Manufacturing

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

4.4

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, SDA metric please specify :gCO2e

(7.53.4.17) Target denominator

☑ Vehicle km

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.4

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

192

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

100

(7.53.4.29) Figure in reporting year

175

(7.53.4.30) % of target achieved relative to base year

18.478260869565215

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Automotive. Target revised in 2023. In 2023 ISP revised the perimeter and the scope of the Automotive sector, adding light trucks (previously only passenger cars), excluding short term loans and bonds HTC, extending the scope of emissions to Well To Wheel (previously Tank To Wheel) and setting a new Net Zero interim target - the target of 100 gCO2e/vkm to 2030 was calculated with the reduction approach and meets the expected reduction of the net-zero aligned IEA curves for the two components: IEA NZ 2050 Automotive pathway (TTW) and IEA NZ 2050 Power pathway (WTT). No IEA NZ benchmark curve is available for Scope 3 WTW. Scope included in the target: Scope 3: WTW. Latest available Benchmark Scenario: IEA NZ 2050 Scenario Benchmark (2025) -TTW. The IEA Scenario refers to the Tank-To-Wheel component and is not comparable with the revised Automotive target which also includes the Well-To-Tank component. Benchmark scenario for target setting: IEA NZ Scenario Benchmark (2023) -TTW. Other details: Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: Medium and long-term loans. Value chain in scope: Production of light duty vehicles (light trucks in addition to passenger cars) in line with the design choices made for the definition of SBTi targets. Exclusion of manufacturing components because these products are independent of final vehicle emissions. The Group fulfilled the commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation on 27th January 2025. Portfolio weighting: Financed production weighted approach. The portfolio coverage (31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Automotive revised: 0.4%(€1.8bn). Column 14 % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. The target is covered by third party limited assurance. For further details refer to p.128 focus on "Automotive" and "Methodology: Target Setting on Lending Activities" p.138-142 in the 2025

Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo is committed to supporting companies in the automotive sector as they navigate the complex transition toward sustainable mobility. The Bank recognises that reducing the sector's climate impact requires significant transformation, including the conversion of existing production facilities and the adoption of advanced, sustainable technologies across the entire value chain.

(7.53.4.1) Target reference number

☑ Por4

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Infrastructure

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

1.5

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, SDA metric please specify :KgCO2e

(7.53.4.17) Target denominator

☑ Meters squared

(7.53.4.18) % of portfolio covered in relation to total portfolio value

1.5

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

43.16

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

22.11

(7.53.4.29) Figure in reporting year

36.14

(7.53.4.30) % of target achieved relative to base year

33.34916864608075

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ Well-below 2°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Commercial Real Estate (CRE). Metric used for target and baseline: kgCO2e/m2. Latest available Benchmark Scenario: CRREM 1.5C reduction pathway for Italy adjusted on ISP's portfolio composition (v2 2024). Benchmark scenario for target setting: ISP specific WB2D pathway calculated through SBTi tool. In 2024 the level of ambition for the Commercial Real Estate sector target was increased. ISP will continue to analyse the sector and to improve data availability and quality, also trying to define ways to further decrease emissions towards NZ. However, it is to be noted that achieving the target is significantly dependent on the implementation of government policies for the decarbonisation of the energy grid. Value chain coverage: In-use operational emissions of buildings in Italy. Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: MLT loans, including SMEs (but not SME retail clients). For the CRE sector, the baseline physical intensity at December 2022 was calculated using a 2020 carbon factor for emissions intensity of final energy consumption, 2020 conversion factors to convert from primary to final energy intensity and December 2022 exposures. Emissions coverage: Scope1,2,3. Scope 3 emissions for CRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.The Group fulfilled the commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation on 27th January 2025. Portfolio weighting: Financed floor area weighted approach. Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. The portfolio coverage (31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is CRE: 1.5% (€6.4bn). The target is covered by third party limited assurance. For further details please refer to page 131 focus on "CRE" and

"Methodology: Target Setting on Lending Activities" pages 138-142 in the 2025 Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

To reduce emissions while supporting customer transition with dedicated finance. Intesa Sanpaolo is committed to supporting companies in the sustainable transition of their real estate assets through a combination of financial and non-financial solutions, comprising advisory services on sustainability improvements also taking advantage of available government subsidies.

(7.53.4.1) Target reference number

☑ Por5

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

12/31/2023

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Materials

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

4

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, SDA metric please specify :tCO2

(7.53.4.17) Target denominator

☑ Other, SDA denominator please specify :t Steel

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.2

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

1.05

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

0.81

(7.53.4.29) Figure in reporting year

0.9

(7.53.4.30) % of target achieved relative to base year

62.500000000000014

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Iron&Steel. Metric used for target and baseline: tCO2/tSteel. Latest available Benchmark Scenario: IEA Net Zero Scenario Benchmark (2025). Benchmark Scenario for target setting: ISP specific 1.5°C - pathway calculated through SBTi tool. Other details: Frequency of target reviews: the Bank monitors the target quarterly. The Group fulfilled the commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation on 27th January 2025. Asset classes: Medium and long-term loans. Emissions coverage: Scope 1 and 2. Reported scope 1 and 2 emissions sourced from company reports applied for top material financed producers. For remaining counterparties or where reported data are not available, emission factors covering scope 1 and 2 emissions from pig iron, Direct Reduced Iron and steel production through BF-BOF (Blast Furnace-Basic Oxygen Furnace) and EAF (Electric Arc Furnace) methods are applied. Value chain coverage: focus on companies producing crude steel that use iron ore (or scrap) as an input. Mining of raw materials and steel finishing and downstream use are excluded given reduced emission materiality and low data availability. Portfolio weighting: Financed production weighted approach. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Iron & Steel: 0.2% (€0.9bn). Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. The target is covered by third party limited assurance. For further details please refer to page 133 focus on "Iron&Steel" and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report. Disclaimer: Metrics

and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

To reduce emissions while supporting customer transition with dedicated finance. Accelerating the transition to a lower-carbon future and deploying innovative technologies will be essential for the Iron & Steel industry to align with sectoral Net Zero targets. Intesa Sanpaolo is committed to supporting this evolution, in line with its strategic ambition to achieve Net Zero in 2050, prioritising the following key areas of action: prioritising counterparties with science-based, independently verified targets, dedicated financing to support decarbonisation solutions and client engagement and accessing tailored transition financing.

(7.53.4.1) Target reference number

☑ Por6

(7.53.4.2) Target type

☑ Other, please specify :Exclusion policy

(7.53.4.4) Methodology used when setting the target

☑ Other please specify :Exclusion policy

(7.53.4.5) Date target was set

12/31/2021

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Fossil Fuels

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans
☑ Project finance

(7.53.4.12) Target type: Absolute or intensity

☑ Absolute

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, please specify :Euro Billion Exposure

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.002

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

0.2

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2025

(7.53.4.28) Figure in target year

0

(7.53.4.29) Figure in reporting year

0.01

(7.53.4.30) % of target achieved relative to base year

95

(7.53.4.31) Target status in reporting year

☑ Achieved

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Coal mining target: Target refers to Coal mining and not to the whole Coal sector. Metric used for target and baseline: € billion. Baseline year: Portfolio exposure as at 30.06.2021: €0.2bn. 2025 target: Zero exposure. Scenario used: Exclusion policy. According to Intesa Sanpaolo coal policy, coal mining must be phased out within 2025, therefore exposure equal to zero in 2025. Intesa Sanpaolo: RULES FOR LENDING OPERATIONS IN THE COAL SECTOR. https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/inglese/policy/Summary%20Rules%20for%20the%20Coal%20sector_july%202021.pdf. The Group confirms the achievement in 2025 of the phase-out for its exposure to counterparties active in the coal mining sector, as per exclusion policy; a marginal amount remains, mainly attributable to a non-performing exposure. Other details: Asset classes: Short-medium-long term loans. The perimeter has been selected at counterparty level based on the "Coal Mining" sector available in the Bank's IT systems and without any exclusion of SMEs counterparties. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Coal mining: 0.002% (€0.01bn). For further details please refer to "Coal Mining" focus page 130 and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report.

(7.53.4.38) Target objective

To zero exposure from coal mining.

(7.53.4.1) Target reference number

☑ Por7

(7.53.4.2) Target type

☑ Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

☑ NZAOA Target Setting Protocol

(7.53.4.5) Date target was set

12/31/2022

(7.53.4.6) Target is set and progress against it is tracked at

☑ Portfolio level

(7.53.4.9) Portfolio

☑ Investing (Asset owner)

(7.53.4.10) Asset classes covered by the target

☑ Bonds

☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

28

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, please specify :tCO2e

(7.53.4.17) Target denominator

☑ Other, please specify :EVIC Mln Euro

(7.53.4.18) % of portfolio covered in relation to total portfolio value

17.9

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

96.44

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2029

(7.53.4.28) Figure in target year

48.22

(7.53.4.29) Figure in reporting year

57.32

(7.53.4.30) % of target achieved relative to base year

81.1281625881377

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The Intesa Sanpaolo Assicurazioni Group joined the Net Zero Asset Owner Alliance (NZAOA) in 2021 and published the first intermediate decarbonisation targets for 2030 in October 2022. In particular, as part of the mitigation of emissions of its investment portfolio, the Intesa Sanpaolo Assicurazioni Group, in line with the indications of the Intergovernmental Panel on Climate Change (IPCC), the "Target Setting Protocol" (second edition) of the NZAOA and, using different climate scenarios including those defined by the "One Earth Climate Model" (OECM), has committed to Quantitative sub portfolio target: the ISPA Group has set for Direct Investments in Listed Equity and Publicly Traded Corporate Bonds Carbon Intensity reduction target by 50% compared to the baseline of 31 December 2021. The Insurance Division has set a carbon intensity reduction target in line with NZAOA commitment. Original target before it was converted into the format required by CDP: The Targets were defined in dollars while those reported in the previous columns were converted into euros using the exchange rate on 31/12/2025: Reference EUR/USD FX rate: 1.1750 (31/12/2025). This also led to a change in the base year value and in the target value. The original numbers in dollars for the baseline are 82.08 (tCO2e/Mln$); figure in reporting year 48.78 (tCO2e/Mln$) and figure in target year 41 (tCO2e/Mln$). The denominator used to calculate total emissions refers to the PAI scope (Scope 1, Scope 2 excluding Scope 3). % of portfolio covered in relation to total portfolio value: “Portfolio in Scope” amounted to €19.6bn at 31 December 2021 out of total Asset Owner division assets reported in question 1.10 (year 2025).

(7.53.4.38) Target objective

Investing in lower emission companies and helping the transition through engagement with corporates.

(7.53.4.1) Target reference number

☑ Por8

(7.53.4.2) Target type

☑ Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

☑ PAII's Net Zero Investment Framework

(7.53.4.5) Date target was set

12/31/2022

(7.53.4.6) Target is set and progress against it is tracked at

☑ Portfolio level

(7.53.4.9) Portfolio

☑ Investing (Asset manager)

(7.53.4.10) Asset classes covered by the target

☑ Bonds
☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Fossil Fuels
☑ Biotech, health care & pharma
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services
☑ Food, beverage & agriculture

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

33.9

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, please specify :Metric tons CO2e

(7.53.4.17) Target denominator

☑ Other, please specify :Mln Euro revenue

(7.53.4.18) % of portfolio covered in relation to total portfolio value

12

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2019

(7.53.4.23) Figure in base year

195.6

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

97.8

(7.53.4.29) Figure in reporting year

120.6

(7.53.4.30) % of target achieved relative to base year

76.68711656441718

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

EURIZON NET ZERO TARGETS Eurizon published its targets in Nov 2022 in line with NZAMI criteria. The commitments of the NZAMI signatories are articulated in four areas of action (Asset Level Alignment Target, Portfolio Level Reference Target, Stewardship Target and Investment in Climate Solutions Target). The methodology that Eurizon has followed to define its targets is the Paris Aligned Investment Initiative "Net Zero Investment Framework 1.5C" (NZIF); these targets were set taking into account Scope 1 and Scope 2 emissions only, as Scope 3 emissions will be included when data availability is improved. During 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context, which was completed with its relaunch and an updated framework. Following the relaunch, Eurizon confirmed its membership and, in line with the new Commitment Statement, updated certain commitments to reflect both the solidity of the process already undertaken and changes to the reference scenario. The Asset Level Alignment target is no longer a strategic priority, and although no external reporting is envisaged, Eurizon intends to maintain internal monitoring activities. For further details refer to Eurizon Net Zero Progress Report 2025. Among targets set, Eurizon reports in CDP: PORTFOLIO LEVEL REFERENCE. Original target before it was converted into the format required by CDP: Weighted Average Carbon Intensity (WACI) of investee companies expressed as tCO2e/mln$ Revenue. Baseline 2019,166.47 tCO2e/mln$; figure in reporting year 102.67 tCO2e/mln$; figure in target year 2030 (-50%). Reference EUR/USD FX rate: 1.1750 (31/12/2025). The asset classes in scope for target setting are Corporate Fixed Income (including the duration up to 12 months) and Listed Equity (asset classes covered by NZIF 1.0 methodology). Sovereign bonds and Infrastructure and Private Equity are not

considered within scope of our target setting due to methodologies still under development. The sectors selected are represented by the NACE codes A-H and J-L, according to the NZIF methodology. % of portfolio emissions covered by the target: emissions in scope of target setting out of total scope 1 and 2 emissions in the PAI perimeter (Eurizon+Fideuram). % of portfolio covered in relation to total portfolio value: "Portfolio in Scope" amounted to €67.5bn at 31 December 2021 out of total assets management division assets reported in question 1.10 (year 2025).

(7.53.4.38) Target objective

Investing in lower emission companies and helping the transition through engagement with corporates.

(7.53.4.1) Target reference number

☑ Por10

(7.53.4.2) Target type

☑ Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

☑ PAII's Net Zero Investment Framework

(7.53.4.5) Date target was set

12/31/2022

(7.53.4.6) Target is set and progress against it is tracked at

☑ Portfolio level

(7.53.4.9) Portfolio

☑ Investing (Asset manager)

(7.53.4.10) Asset classes covered by the target

☑ Bonds
☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Fossil Fuels
☑ Biotech, health care & pharma
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services
☑ Food, beverage & agriculture

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

8.16

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, please specify :Metric tons CO2e (EVIC based)

(7.53.4.17) Target denominator

☑ Other, please specify :Mln Euro

(7.53.4.18) % of portfolio covered in relation to total portfolio value

2.8

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

83.1

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

41.55

(7.53.4.29) Figure in reporting year

51.08

(7.53.4.30) % of target achieved relative to base year

77.06377858002406

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Fideuram Asset Management Ireland (FAMI) published its targets in Nov 2022 in line with NZAMI criteria. The commitments of the NZAMI signatories were articulated in four areas of action (Asset Level Alignment Target, Portfolio Level Reference Target, Stewardship Target and Investment in Climate Solutions Target). The methodology that the company has followed to define its targets is the Paris Aligned Investment Initiative "Net Zero Investment Framework 1.5C"(NZIF); these targets were set considering Scope 1 and Scope 2 emissions only, as Scope 3 emissions will be included when data availability will improve. Among targets set FAMI reports in CDP: PORTFOLIO LEVEL REFERENCE, defined by listed equities and corporate bonds of issuers that operate in material sectors (NACE codes A-H and J-L, according to the NZIF methodology) or classified as higher impact companies by NZIF (CA100 focus list, companies included in Transition Pathway Initiative sectors, plus banks and real estate). The baseline metric is calculated using holdings as of EOY 2021 and company emissions data as of 2019. Figures in base year, in target year, in reporting year are calculated on the holdings with availability of carbon emissions and EVIC in Euro. Progress versus target is represented up to 30.06.2025 to reflect the products perimeter existing before the reorganisation of the Wealth Management Divisions effective from July 1st, 2025. The perimeter of committed products is defined by active products identified as of EOY 2021 list, with the exclusion of Funds of Funds, Index Funds and Quantitative Funds. % of portfolio emissions covered by the target: emissions in scope of target setting out of total scope 1 and 2 emissions in the PAI perimeter (Eurizon + Fideuram). % of portfolio covered in relation to total portfolio value: "Portfolio in Scope" at 31 December 2021 out of total assets reported in question 1.10 for the row Investing (Asset manager) (year 2025).

(7.53.4.38) Target objective

Investing in lower emission companies and helping the transition through engagement with corporates.

1

(7.53.4.1) Target reference number

☑ Por11

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Food, beverage & agriculture

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

3.6

(7.53.4.16) Metric (or target numerator if intensity)

☑ Metric tons CO2e

(7.53.4.17) Target denominator

☑ Other, SDA denominator please specify :Mln Euro revenues

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.2

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

721

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

641

(7.53.4.29) Figure in reporting year

671

(7.53.4.30) % of target achieved relative to base year

62.5

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Agriculture – Primary Farming. Target set in 2024. ISP has set a reduction target of 11% from baseline year to 2030, aligning with the inertial decline projected under Nationally Determined Contributions (NDC) scenario. Latest available Benchmark Scenario: Europe Agriculture NGFS NZ2050 (2024). Benchmark Scenario for target setting: Europe Agriculture NGFS NZ2050 (2023). Metric used for target and baseline: tCO2 e/€m revenue. Other details: Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: medium and long-term loans (includes corporates and SME corporates with more than €10m revenue). Emissions coverage: Scope 1, 2. Value chain coverage: focus on counterparties operating in primary farming sub-sector (e.g., agricultural production like dairy, livestock, crops). All other counterparties in upstream/downstream part of the value chain are excluded. Portfolio weighting: revenue-adjusted exposure weighted approach. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Agriculture – Primary Farming: 0.2% (€0.9bn). The target is covered by third party limited assurance. Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. For further details please refer to "Agriculture – Primary Farming" focus page 125 and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo acknowledges the pivotal role of the agri-food sector in the economy of Italy and the EU. The Bank offers comprehensive support to the sector addressing the needs of businesses of different sizes, position in the value chain, and stages of the transition, for example through its Agribusiness Programme. Recognising the industry's financing needs and its diverse composition, Intesa Sanpaolo provides a wide range of tailored financial products. In addition, the Bank actively contributes to numerous industry and public sector initiatives that promote the sector's development and transition objectives.

(7.53.4.1) Target reference number

☑ Por12

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Materials

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

0.5

(7.53.4.16) Metric (or target numerator if intensity)

☑ Metric tons CO2e

(7.53.4.17) Target denominator

☑ Ton aluminum

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.04

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

4.79

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

4.31

(7.53.4.29) Figure in reporting year

3.03

(7.53.4.30) % of target achieved relative to base year

366.6666666666664

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Aluminium. Target set in 2024. Benchmark scenario: IAI NZ 1.5° (2021). For the Aluminium sector, the scope of the Target Setting exercise includes aluminium producers, bauxite refiners and both primary and secondary aluminium smelting. It excludes counterparties whose activity focuses on the mining of bauxite and raw materials and downstream uses of aluminium. Metric used for target and baseline: tCO2 e/t aluminium. Other details: Frequency of target reviews: the Bank

monitors the target quarterly. Asset classes: medium and long-term loans. Emissions coverage: Scope 1, 2. Value chain coverage: focus on aluminium producers (refining of alumina from bauxite and both primary and secondary smelting). Exclusion of mining of bauxite and other raw materials and downstream uses of aluminium. Portfolio weighting: financed production weighted approach. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Aluminium: 0.04% (€0.2bn). The target is covered by third party limited assurance. Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. For further details please refer to "Aluminium" focus page 127 and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

To reduce emissions while supporting customer transition with dedicated finance. The Bank supports companies at different levels of transition readiness, aligning its approach with key industry trends and evolving sustainability objectives. Recognising that businesses in the aluminium sector have diverse financing needs across products, strategies, and transition pathways, Intesa Sanpaolo aims to contribute to the sector's progress towards sustainability. This includes addressing the entire value chain, from production processes to the energy infrastructure that powers them.

(7.53.4.1) Target reference number

☑ Por13

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Materials

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

1.1

(7.53.4.16) Metric (or target numerator if intensity)

☑ Metric tons CO2e

(7.53.4.17) Target denominator

☑ Ton cement

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.04

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

0.65

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

0.5

(7.53.4.29) Figure in reporting year

0.63

(7.53.4.30) % of target achieved relative to base year

13.333333333333345

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Cement. Target set in 2024. For the Cement sector, the scope of the Target Setting exercise includes cement producers and clinker producers. It excludes counterparties whose activity focuses on the mining of raw materials, creation of concrete, and downstream uses of cement/concrete. Latest available Benchmark Scenario: IEA Net Zero Scenario Benchmark (2025). Benchmark Scenario for target setting: IEA Net Zero Scenario Benchmark (2023). Metric used for target and baseline: tCO2 e/tonne cement. Other details: Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: medium and long-term loans. Emissions coverage: Scope 1, 2. Value chain coverage: focus on cement producers and clinker producers. Exclusion of counterparties whose activity focuses on the mining of raw materials, creation of concrete, and downstream uses of cement/concrete. Portfolio weighting: financed production weighted approach. The portfolio

coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Cement: 0.04% (€0.2bn). The target is covered by third party limited assurance. Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. For further details please refer to "Cement" focus page 129 and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report. Disclaimer: Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

To reduce emissions while supporting customer transition with dedicated finance. To support companies operating in the Cement sector in their efforts to reduce the emissions associated with their production, Intesa Sanpaolo is both prioritising firms with credible decarbonisation commitments and financing technologies that deliver long-term reductions. Based on these principles, the Bank will act through the following levers: financing transition-aligned clients and supporting the development of sector-wide transition solutions and low-carbon innovation.

(7.53.4.1) Target reference number

☑ Por14

(7.53.4.2) Target type

☑ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

☑ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Sector level

(7.53.4.7) Sector

☑ Infrastructure

(7.53.4.8) Portfolios covered by the target

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans

(7.53.4.12) Target type: Absolute or intensity

☑ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

7.6

(7.53.4.16) Metric (or target numerator if intensity)

☑ Other, SDA metric please specify :KgCO2e

(7.53.4.17) Target denominator

☑ Meters squared

(7.53.4.18) % of portfolio covered in relation to total portfolio value

24.8

(7.53.4.21) Frequency of target reviews

☑ Quarterly

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

30.13

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

19.26

(7.53.4.29) Figure in reporting year

26.88

(7.53.4.30) % of target achieved relative to base year

29.898804047838095

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.34) Is this a science-based target?

☑ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

☑ Other, please specify :The target has been set by defining an ambitious pathway considering market trends, decarbonisation scenarios and systemic constraints specific to the portfolio

(7.53.4.37) Please explain target coverage and identify any exclusions

Sector: Residential Real Estate (RRE). Target set in 2024, Benchmark Scenario: CRREM 1.5° reduction pathway for Italy adjusted on ISP's portfolio composition (v2 2024). For the RRE sector, the scope of the Target Setting exercise includes loan exposures to mortgages in the Private Retail regulatory segment with real estate-related use of proceeds (e.g. purchase, refinance, construction or rehabilitation) and backed by real estate collateral. Metric used for target and baseline: kgCO2 e/meters squared. Other details: Frequency of target reviews: the Bank monitors the target quarterly. Asset classes: mortgages for retail clients. Emissions coverage: Scope 1, 2, and 3. Scope 3 emissions for RRE include emissions arising from the tenant's energy use in the building owner's emissions reporting. Value chain coverage: focus on the in-use operational emissions of buildings in Italy. The perimeter includes private retail clients which finance properties for residential purposes only. Portfolio weighting: financed floor area weighted approach. The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: Residential Real Estate: 24.8% (€106.9bn). The target is covered by third party limited assurance. Column 14: % of portfolio emissions covered by the target: the data refer to emissions in scope out of total emissions of the highest emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI. For further details please refer to "Residential Real Estate (RRE)" focus page 136 and "Methodology: Target Setting on Lending Activities" pages 138 to 142 in the 2025 Intesa Sanpaolo Climate Report. Disclaimer: Metrics and data may be updated over

time following evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo is committed to supporting the redevelopment of Italy's real estate assets to meet the ambitious targets set by the EU Energy Performance of Buildings Directive. The strategy focuses on two priorities: increasing financing for highly energy-efficient buildings and promoting the transition of less efficient properties through retrofitting solutions and, beyond financing, the Bank has developed consulting support to advise its customers on opportunities and risks related to the efficiency of their assets.

(7.53.4.1) Target reference number

☑ Por15

(7.53.4.2) Target type

☑ Portfolio temperature rating target

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

03/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Asset class level

(7.53.4.9) Portfolio

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans
☑ Project finance

(7.53.4.11) Sectors covered by the target

☑ Food, beverage & agriculture
☑ Fossil Fuels
☑ Infrastructure
☑ Materials
☑ Retail

(7.53.4.13) Emissions scopes of portfolio companies covered by the target

☑ Scope 1 + 2

(7.53.4.16) Metric (or target numerator if intensity)

☑ Degrees of warming

(7.53.4.18) % of portfolio covered in relation to total portfolio value

4

(7.53.4.19) Total value of assets covered by the target

16000000000

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

18

(7.53.4.21) Frequency of target reviews

☑ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

2.95

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2028

(7.53.4.28) Figure in target year

2.47

(7.53.4.29) Figure in reporting year

2.6

(7.53.4.30) % of target achieved relative to base year

72.91666666666669

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.32) Aggregation weighting used

☑ Weighted average temperature score (WATS)

(7.53.4.33) % of the temperature score calculated in the reporting year based on company targets

32

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Other long-term corporate loans portfolio, according to SBTi methodology. Target set in 2024 and validated by SBTi on 27th January 2025. Frequency of target reviews: the Bank monitors the target semi-annually. Asset classes: medium and long term loans except for fossil fuels which consider also short-term loans. Emissions coverage: Scope 1 and 2. Portfolio weighting: weighted average temperature score (WATS.) The portfolio coverage (as at 31/12/2025) for the value chain in scope with respect to the total consolidated loan portfolio of the ISP Group (€430.7bn) is: 4% (€16 bn). Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to SBTi Guidelines, updated data sources and accepted market practices. With reference to column 11 "Sectors covered by the target", the temperature rating target refers to specific sectors: Oil&Gas, Real Estate, Coal mining, Metallurgy, Agriculture, fishing and livestock farming, Tobacco, Forestry and other forest-related activities, Wood and paper, Large-scale retail.

(7.53.4.38) Target objective

Intesa Sanpaolo aims to actively support companies pursuing a virtuous decarbonisation path.

(7.53.4.1) Target reference number

☑ Por16

(7.53.4.2) Target type

☑ Portfolio temperature rating target

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

03/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Asset class level

(7.53.4.9) Portfolio

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Loans
☑ Project finance

(7.53.4.11) Sectors covered by the target

☑ Food, beverage & agriculture
☑ Fossil Fuels
☑ Infrastructure
☑ Materials
☑ Retail

(7.53.4.13) Emissions scopes of portfolio companies covered by the target

☑ Scope 1 + 2 + 3

(7.53.4.16) Metric (or target numerator if intensity)

☑ Degrees of warming

(7.53.4.18) % of portfolio covered in relation to total portfolio value

4

(7.53.4.19) Total value of assets covered by the target

16000000000

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

18

(7.53.4.21) Frequency of target reviews

☑ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base yea

3.01

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2028

(7.53.4.28) Figure in target year

2.51

(7.53.4.29) Figure in reporting year

2.95

(7.53.4.30) % of target achieved relative to base year

11.999999999999922

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.32) Aggregation weighting used

☑ Weighted average temperature score (WATS)

(7.53.4.33) % of the temperature score calculated in the reporting year based on company targets

22

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Other long-term corporate loans portfolio, according to SBTi methodology. Target set in 2024 and validated by SBTi on 27th January 2025. Frequency of target reviews: the Bank monitors the target semi-annually. Asset classes: medium and long term loans except for fossil fuels which consider also short-term loans. Emissions coverage: Scope 1, 2 and 3. Portfolio weighting: weighted average temperature score (WATS.) Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to SBTi Guidelines, updated data sources and accepted market practices. With reference to column 11 "Sectors covered by the target", the temperature rating target refers to specific sectors: Oil&Gas, Real Estate, Coal mining, Metallurgy, Agriculture, fishing and livestock farming, Tobacco, Forestry and other forest-related activities, Wood and paper, Large-scale retail.

(7.53.4.38) Target objective

Intesa Sanpaolo aims to actively support companies pursuing a virtuous decarbonisation path.

(7.53.4.1) Target reference number

☑ Por17

(7.53.4.2) Target type

☑ Portfolio temperature rating target

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

03/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Asset class level

(7.53.4.9) Portfolio

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Bonds
☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(7.53.4.13) Emissions scopes of portfolio companies covered by the target

☑ Scope 1 + 2

(7.53.4.16) Metric (or target numerator if intensity)

☑ Degrees of warming

(7.53.4.18) % of portfolio covered in relation to total portfolio value

4

(7.53.4.19) Total value of assets covered by the target

18000000000

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews

☑ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

2.23

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2028

(7.53.4.28) Figure in target year

1.99

(7.53.4.29) Figure in reporting year

1.93

(7.53.4.30) % of target achieved relative to base year

125.00000000000003

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.32) Aggregation weighting used

☑ Weighted average temperature score (WATS)

(7.53.4.33) % of the temperature score calculated in the reporting year based on company targets

61

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Listed equity, corporate bonds and ETFs portfolio, according to SBTi methodology. Target set in 2024 and validated by SBTi on 27th January 2025. Frequency of target reviews: the Bank monitors the target semi-annually. Asset classes: Listed equity, corporate bonds and ETFs portfolio. Emissions coverage: Scope 1 and 2. Portfolio weighting: weighted average temperature score (WATS.) Listed equity, corporate bonds and ETFs portfolio amounts to 18 billion euro respects to portfolio value based on assets value as reported in 1.10 (according to CDP methodology) is 4%. Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo aims to actively support companies pursuing a virtuous decarbonisation path.

(7.53.4.1) Target reference number

☑ Por18

(7.53.4.2) Target type

☑ Portfolio temperature rating target

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

03/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Asset class level

(7.53.4.9) Portfolio

☑ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

☑ Bonds

☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Transportation services
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ International bodies

(7.53.4.13) Emissions scopes of portfolio companies covered by the target

☑ Scope 1 + 2 + 3

(7.53.4.16) Metric (or target numerator if intensity)

☑ Degrees of warming

(7.53.4.18) % of portfolio covered in relation to total portfolio value

4

(7.53.4.19) Total value of assets covered by the target

18000000000

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews

☑ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

2.56

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2028

(7.53.4.28) Figure in target year

2.21

(7.53.4.29) Figure in reporting year

2.43

(7.53.4.30) % of target achieved relative to base year

37.1428571428571

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.32) Aggregation weighting used

☑ Weighted average temperature score (WATS)

(7.53.4.33) % of the temperature score calculated in the reporting year based on company targets

61

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

Listed equity, corporate bonds and ETFs portfolio, according to SBTi methodology. Target set in 2024 and validated by SBTi on 27th January 2025. Frequency of target reviews: the Bank monitors the target semi-annually. Asset classes: Listed equity, corporate bonds and ETFs portfolio. Emissions coverage: Scope 1, 2 and 3. Portfolio weighting: weighted average temperature score (WATS.) Listed equity, corporate bonds and ETFs portfolio amounts to 18 billion euro respects to portfolio

value based on assets value as reported in 1.10 (according to CDP methodology) is 4%. Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo aims to actively support companies pursuing a virtuous decarbonisation path.

(7.53.4.1) Target reference number

☑ Por19

(7.53.4.2) Target type

☑ Portfolio temperature rating target

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

03/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Asset class level

(7.53.4.9) Portfolio

☑ Investing (Asset owner)

(7.53.4.10) Asset classes covered by the target

☑ Bonds
☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(7.53.4.13) Emissions scopes of portfolio companies covered by the target

☑ Scope 1 + 2

(7.53.4.16) Metric (or target numerator if intensity)

☑ Degrees of warming

(7.53.4.18) % of portfolio covered in relation to total portfolio value

18.3

(7.53.4.19) Total value of assets covered by the target

33200000000

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews

☑ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

2.28

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2028

(7.53.4.28) Figure in target year

2.02

(7.53.4.29) Figure in reporting year

1.98

(7.53.4.30) % of target achieved relative to base year

115.38461538461542

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.32) Aggregation weighting used

☑ Weighted average temperature score (WATS)

(7.53.4.33) % of the temperature score calculated in the reporting year based on company targets

73

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

In relation to this target, Intesa Sanpaolo Group fulfilled its commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation on 27th January 2025. The commitment, based on the consolidated balance sheet of the ISP Group, also includes the portfolio of the Insurance Division defined according to SBTi criteria, and it provides for the alignment of the scope 1 2 portfolio temperature score by invested value within the Insurance division listed equity and corporate bonds portfolio from 2.28C in 2022 to 2.02C by 2028. Frequency of target reviews: Intesa Sanpaolo Group monitors the target annually. Asset classes: listed equity and corporate bonds. Emissions coverage: Scope 1 and 2. Portfolio weighting: weighted average temperature score (WATS.) The portfolio coverage subject to Temperature Rating Target (€33.2bn as at 31/12/2025), with respect to the total portfolio (€181.1bn, as reported in question 1.10), is equal to 18.3%. Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo aims to actively support companies pursuing a virtuous decarbonisation path.

(7.53.4.1) Target reference number

☑ Por20

(7.53.4.2) Target type

☑ Portfolio temperature rating target

(7.53.4.4) Methodology used when setting the target

☑ SBTi for Financial Institutions

(7.53.4.5) Date target was set

03/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

☑ Asset class level

(7.53.4.9) Portfolio

☑ Investing (Asset owner)

(7.53.4.10) Asset classes covered by the target

☑ Bonds
☑ Equity investments

(7.53.4.11) Sectors covered by the target

☑ Retail
☑ Apparel
☑ Services
☑ Materials
☑ Hospitality
☑ Food, beverage & agriculture
☑ Biotech, health care & pharma
☑ Fossil Fuels
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(7.53.4.13) Emissions scopes of portfolio companies covered by the target

☑ Scope 1 + 2 + 3

(7.53.4.16) Metric (or target numerator if intensity)

☑ Degrees of warming

(7.53.4.18) % of portfolio covered in relation to total portfolio value

18.3

(7.53.4.19) Total value of assets covered by the target

33200000000

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews

☑ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

2.63

(7.53.4.24) We have an interim target

☑ No

(7.53.4.27) End date of target

12/31/2028

(7.53.4.28) Figure in target year

2.25

(7.53.4.29) Figure in reporting year

2.53

(7.53.4.30) % of target achieved relative to base year

26.31578947368424

(7.53.4.31) Target status in reporting year

☑ Underway

(7.53.4.32) Aggregation weighting used

☑ Weighted average temperature score (WATS)

(7.53.4.33) % of the temperature score calculated in the reporting year based on company targets

73

(7.53.4.34) Is this a science-based target?

☑ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

☑ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

In relation to this target, Intesa Sanpaolo Group fulfilled its commitment taken in the 2022-2025 Business Plan by submitting its targets to SBTi in 2024 and receiving validation on 27th January 2025. The commitment, based on the consolidated balance sheet of the ISP Group, also includes the portfolio of the Insurance Division defined according to SBTi criteria, and it provides for the alignment of the scope 1 2 3 portfolio temperature score by invested value within the Insurance Division listed equity and corporate bonds portfolio from 2.63C in 2022 to 2.25C by 2028. Frequency of target reviews: Intesa Sanpaolo Group monitors the target annually. Asset classes: listed equity and corporate bonds. Emissions coverage: Scope 1,2 and 3. Portfolio weighting: weighted average temperature score (WATS.) The portfolio coverage subject to Temperature Rating Target (€33.2bn as at 31/12/2025), with respect to the total portfolio (€181.1bn, as reported in question 1.10), is equal to 18.3%. Metrics and data may be updated over time following evolution of the emission calculation methodology, the updates to SBTi Guidelines, updated data sources and accepted market practices.

(7.53.4.38) Target objective

Intesa Sanpaolo aims to actively support companies pursuing a virtuous decarbonisation path.

(7.54) Did you have any other climate-related targets that were active in the reporting year?

☑ Targets to increase or maintain low-carbon energy consumption or production
☑ Net-zero targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

(7.54.1.1) Target reference number

☑ Low 4

(7.54.1.2) Date target was set

12/31/2021

(7.54.1.3) Target coverage

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

☑ Electricity

(7.54.1.5) Target type: activity

☑ Consumption

(7.54.1.6) Target type: energy source

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2019

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

537050

(7.54.1.9) % share of low-carbon or renewable energy in base year

87.7

(7.54.1.10) End date of target

12/31/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

95.3

(7.54.1.13) % of target achieved relative to base year

61.79

(7.54.1.14) Target status in reporting year

☑ Underway

(7.54.1.16) Is this target part of an emissions target?

Abs10

(7.54.1.17) Is this target part of an overarching initiative?

☑ No, it’s not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

Target also disclosed in CDP 2025. The target applies to 100% of Intesa Sanpaolo Group perimeter. The target covers all electricity directly purchased.

(7.54.1.20) Target objective

In the Own Emission Plan, the Bank identifies, as part of the Net-Zero process, specific actions aimed at reaching 100% of electricity at Group level directly purchased from renewable sources where available.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

In its Own Emissions Plan, the Bank identifies specific actions aimed at reaching 100% of electricity at Group level directly purchased from renewable sources; for example, some of the actions envisaged in the Plan are: 1) Certificates with Guarantee of Origin (GO certificates) - electronic certification attesting to the renewable origin of the sources used by IGO-qualified plants; 2) Renewable Energy Certificate systems (RECs) in the USA and European Energy Certificate System (EECS) in Europe for issuing national Guarantee of Origin (GO) certificates; 3) Supply contracts with "green tariffs" (energy from renewable sources) explicitly mentioned in the supply document and not supported by Guarantee of Renewable Origin Certificates.

(7.54.3) Provide details of your net-zero target(s).

☑ NZ1

(7.54.3.2) Date target was set

12/31/2021

(7.54.3.3) Target Coverage

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

☑ Por1
☑ Por2
☑ Por3
☑ Por4
☑ Por5
☑ Por10
☑ Por11
☑ Por12
☑ Por13
☑ Por14
☑ Por6
☑ Por7
☑ Por8
☑ Abs10
☑ Abs11

(7.54.3.5) End date of target for achieving net zero

12/31/2050

(7.54.3.6) Is this a science-based target?

☑ No, but we are reporting another target that is science-based

(7.54.3.8) Scopes

☑ Scope 1
☑ Scope 2
☑ Scope 3

(7.54.3.9) Greenhouse gases covered by target

☑ Methane (CH4)
☑ Nitrous oxide (N2O)
☑ Carbon dioxide (CO2)
☑ Perfluorocarbons (PFCs)
☑ Hydrofluorocarbons (HFCs)
☑ Sulphur hexafluoride (SF6)
☑ Nitrogen trifluoride (NF3)

(7.54.3.10) Explain target coverage and identify any exclusions

The Intesa Sanpaolo Group has committed to contributing to the achievement of global climate goals, facilitating the transition to a low carbon economy, aware of the risks and opportunities presented by the new operating and regulatory context, both current and prospective, induced by climate change. Initially this commitment was confirmed in 2021, when the Group adhered to the main Net-Zero initiatives promoted by UNEP FI and chose to pursue the Net-Zero objective by 2050 across all its main business lines, including its own emissions, lending and investment portfolios, as well as the asset management and insurance divisions, as reinforced in the 2022–2025 Business Plan. In the fourth quarter of 2021, in addition to joining the Net-Zero Banking Alliance (NZBA), Intesa Sanpaolo joined the Net Zero Asset Managers Initiative (NZAMI) through Eurizon Capital SGR, Fideuram Asset Management SGR and Fideuram Asset Management Ireland and the Net-Zero Asset Owner Initiative (NZAOA), as well as the Net-Zero Insurance Alliance (NZIA) through Intesa Sanpaolo Assicurazioni, the latter replaced in 2024 by the Forum for Insurance Transition to Net Zero (FIT). The Intesa Sanpaolo Group's commitment to decarbonisation continues under the new 2026–2029 Business Plan, with confirmation of the 2030 targets for its financed emissions, asset management, insurance and own emissions. Coverage and exclusions will take into account evolution of climate-related guidelines and regulations.

(7.54.3.11) Target objective

The target is linked to Intesa Sanpaolo's strategic adherence in 2021 to the main Net-Zero initiatives promoted by UNEP FI and to trends in European regulations. The Intesa Sanpaolo Group's commitment to decarbonisation continues under the new 2026–2029 Business Plan, with confirmation of the 2030 targets for its

financed emissions, asset management, insurance and own emissions and of its commitment to pursue the Net Zero objective by 2050. The aim of the target is to reduce own and customers emissions. Customer transition is supported through engagement, advisory services and dedicated finance, also allowing to develop new business opportunities within an adequate risk framework.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

☑ No, and we do not plan to within the next two years

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

☑ Yes, we plan to purchase and cancel carbon credits for beyond value chain mitigation
☑ Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

In terms of milestones, near term targets already set on the banking portfolio of the group do not provide for carbon credits to be used by the Group; in terms of 2050 targets, carbon credits will be used for unabatable emissions according to the provisions of regulations in force at that time.

(7.54.3.17) Target status in reporting year

☑ Underway

(7.54.3.19) Process for reviewing target

Intesa Sanpaolo periodically monitors its targets and publishes once a year in the climate report the situation at year end. As concerns the revision of targets this will be done in accordance with climate related guidelines and regulations. Coverage and exclusions will take into account evolution of climate-related guidelines and regulations.

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

	Emissions reduction initiatives that were active within the reporting year
	☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*0*	
To be implemented	*84*	*2650.89*
Implementation commenced	*13*	*173.92*

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Implemented	*25*	*8510.46*
Not to be implemented	*0*	

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☑ Other low-carbon energy consumption initiative, please specify :Renewable electricity certifications (GO, RECs, etc.)

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

3521.7

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

☑ Ongoing

(7.55.2.9) Comment

In 2025, thanks to the additional renewable energy purchases, 3,521.70 tCO2e were avoided. Without considering change in methodology for emission factors (see question 7.10.1) in 2025, 3,007.49 tCO2e were avoided.

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☑ Solar PV

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

69.25

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

36970

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

377416

(7.55.2.7) Payback period

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

☑ 16-20 years

(7.55.2.9) Comment

The Intesa Sanpaolo Group in 2025 continued to implement proactive emissions reduction initiatives, through energy consumption optimisation actions and energy efficiency measures.

(7.55.2.1) Initiative category & Initiative type

Company policy or behavioral change

☑ Site consolidation/closure

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

182.01

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 1

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

99989

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

447603

(7.55.2.7) Payback period

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

☑ Ongoing

(7.55.2.9) Comment

Some international banks have relocated their headquarters and closed some branches.

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings
☑ Solar shading

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

18.48

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

45600

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

16138

(7.55.2.7) Payback period

☑ <1 year

(7.55.2.8) Estimated lifetime of the initiative

☑ 16-20 years

(7.55.2.9) Comment

The Intesa Sanpaolo Group in 2025 continued to implement proactive emissions reduction initiatives, through energy consumption optimisation actions and energy efficiency measures.

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings
☑ Lighting

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

97

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

48000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

10000

(7.55.2.7) Payback period

☑ <1 year

(7.55.2.8) Estimated lifetime of the initiative

☑ 6-10 years

(7.55.2.9) Comment

The Intesa Sanpaolo Group in 2025 continued to implement proactive emissions reduction initiatives, through energy consumption optimisation actions and energy efficiency measures.

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☑ Building Energy Management Systems (BEMS)

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

50.04

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

123481

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

257368

(7.55.2.7) Payback period

☑ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

☑ 6-10 years

(7.55.2.9) Comment

The Intesa Sanpaolo Group in 2025 continued to implement proactive emissions reduction initiatives, through energy consumption optimisation actions and energy efficiency measures.

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☑ Heating, Ventilation and Air Conditioning (HVAC)

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

810.11

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

395383

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

6291946

(7.55.2.7) Payback period

☑ 11-15 years

(7.55.2.8) Estimated lifetime of the initiative

☑ 11-15 years

(7.55.2.9) Comment

The Intesa Sanpaolo Group in 2025 continued to implement proactive emissions reduction initiatives, through energy consumption optimisation actions and energy efficiency measures.

(7.55.2.1) Initiative category & Initiative type

Other

☑ Other, please specify :Digitalisation initiatives

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

3761.86

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

☑ Scope 3 category 1: Purchased goods & services

(7.55.2.4) Voluntary/Mandatory

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

5388979

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

☑ Ongoing

(7.55.2.9) Comment

The Intesa Sanpaolo Group has long been committed to pursuing environmental sustainability goals, striving to use as few resources as possible and to minimise its environmental impact. The reduction in paper consumption also continued in 2025, with a virtuous approach in reducing overall paper consumption, in accordance with the Rules on Green Banking Procurement. Compared with 2024, paper usage has fallen by 10.06%, with a reduction in purchases of all types of paper (recycled, eco-sustainable, traditional) both in Italy and abroad, proof of the Group's increasing focus on its environmental impact. The figures per worker (34.4 kg in 2025 vs 37.3 kg in 2024) also underline the greater awareness of Group employees regarding the use of paper. Thanks to the various dematerialisation measures completed in the last five years, in 2025 around 1,918 tonnes of paper were saved, corresponding to 3,762 tonnes of CO2 avoided and a theoretical cost saving of around 5.4 million euro.

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

(7.55.3.1) Method

☑ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

In line with its past activities, in 2025 Intesa Sanpaolo renewed the certification of its 'Health, Safety & Environment' (HSE) Management System, applied to all owner-occupied properties in Italy, pursuant to the ISO 45001, 14001 and 50001 standards; the certification and surveillance process is performed by an independent third party. Through this instrument, Intesa Sanpaolo keeps a close eye on ESG topics, on the monitoring and management of risk, on the continuous improvement of its performances, and on the involvement of the internal structures. The application and coordination of the System are the responsibility of Intesa Sanpaolo Environment and Energy and Health and Safety structures, involving the Real Estate Management, which centralises activities related to real estate assets, the People Attraction Skills & Learning Strategy for training requirements, Group Technology & Services for the management and streamlining of ICT infrastructure and the Banca dei Territori Division for network activities. The System also involves: cycles of internal audits with first level controls performed by all structures that manage processes identified as sensitive; second level controls aimed at evaluating the compliance of workplaces and processes to ensure that appropriate corrective actions are implemented to manage any anomalies; third level controls performed by the internal audit function. Once a year Intesa Sanpaolo, as Employer, together with its appointed Representative and the Environmental Officer, holds a Management Review meeting, involving all the departments that had an impact on the maintenance of the System. During the meeting the opportunity of reviewing the Environmental and Energy Policy and the Health, Safety and Welfare at Work Policy is also evaluated. The Review is the key moment of analysis and discussion around the performance, the suitability and the effectiveness of the System in regard to the reference ISO standards and current legislation. The meeting examines the results of the internal audits, System performance indicators, changes in the context and stakeholder analysis, internal and external regulatory updates and changes in material factors. The Top Management also evaluates the results achieved and sets new qualitative and quantitative performance improvement goals.

(7.55.3.1) Method

☑ Dedicated budget for energy efficiency

(7.55.3.2) Comment

A dedicated budget for the initiatives of energy efficiency included in the Own Emissions Plan has been established. As a demonstration of the strategic relevance of climate change, in 2022, with the 2022-2025 Business Plan, the Bank's commitment to contain CO2 emissions has resulted in the definition of the new Own Emissions Plan, approved by the Board of Directors, which identifies specific medium/long-term actions aimed at reducing its own Scope 1 and 2 emissions following the Science Based Targets initiative (SBTi) protocol, which requires maintaining the increase in global temperature below 1.5°C compared to pre-industrial levels, as provided for by the Paris Agreement. On 27 January 2025, the Group received the validation by SBTi of the target for the reduction of own emissions (Scope 1 + Scope 2). The Own Emissions Plan targets the direct purchase of 100% of electricity from renewable sources at Group level by 2030 (level of 95.3% reached for the whole Group in 2025), where possible across the Group's operating geographies. Please refer to the "Metrics & Targets" chapter in the 2025 Climate Report for further details. In terms of direct costs the Group has implemented an energy efficiency plan and energy consumption optimisation measures which allow for annual economic savings; thanks to the activities implemented in 2025 the economic savings amounted to around 750,000 euro.

(7.55.3.1) Method

☑ Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

The Intesa Sanpaolo 2022-2025 Business Plan confirmed the strong focus on climate with the commitment to providing €88bn of which €76bn of new lending in order to support the green economy, circular economy and the ecological transition (including Mission 2 NRRP) and €12bn dedicated to individuals, mostly in relation to green lending to individuals. The commitment to the circular economy was confirmed with a dedicated credit facility amounting to €8bn over the Business Plan horizon. In detail, the 2022-2025 Business Plan includes a specific objective relating to the disbursement of green loans to individuals equal to 12 billion euro, in order to give further boost to sustainable credit for retail customers with special emphasis on the ecological transition. Overall, Green Mortgage disbursements amounted to ~€15.2bn in the 2022-2025 period (of which ~€6.3bn in 2025). Within the green mortgages offer, the Bank proposes Green - Mutuo Domus: a mortgage loan with favourable terms (reduced interest rate and free energy performance certification for renovation purposes) that allows, among others, the financing of the purchase or construction of energy efficient residential properties, as well as the energy upgrading of residential properties in Italy.

(7.55.3.1) Method

☑ Employee engagement

(7.55.3.2) Comment

The ISP Group aims to ensure that by 2025 all the Group's people have received training in the ESG field. The Group provides all staff with access to ESG training through a Training Plan structured on two levels: a base level, cutting across the various issues and delivered to all employees, mainly through online Learning Objects, and an in-depth or specialist level, on individual issues, curated by the Divisions and Governance Areas concerned. Over the course of 2025, a new Group training strategy was defined, leading to the creation of the Corporate Academy, which focuses on topics that are relevant, strategic, and cross-functional for the Group and is structured into eight Faculties. One of them will be dedicated to the ESG field: focused on three pillars — Environment, Social, and Governance — from the perspective of the financial sector. In 2025 the Group's total number of participants to ESG training was 87,592 (96.5% of the total number of employees). Within the training offer made available through multimedia platforms, specific LO were dedicated to environmental and climate change topics such as Net Zero, circular economy, energy transition, decarbonisation and renewable energy and environmental protection. Over 65,400 participants completed these learning objects for around 73,500 training hours. Specific courses are compulsory for staff directly involved in the application of Environmental and Energy Management Systems (nearly 7,400 employees as at 31.12.2025). Among other initiatives, IMI CIB is committed to raising awareness among colleagues, in Italy and abroad, on ESG and climate issues. Throughout 2025, the Division engaged in continuous knowledge sharing within its structure and with other areas of the Bank, focusing on topics related to climate change, climate impact and climate risk. Within the "live" schedule of the new high school academic path "IMI CIB Next Generation Education Program",

promoted in collaboration with Digit'Ed and SDA Bocconi, that involved around 90 professionals from the Division, broad relevance was also dedicated to ESG issues with specific focus on climate change and the connected risks. This knowledge aims to better support customers in their decarbonisation processes and align with the Group's Net Zero portfolio targets.

(7.55.3.1) Method

☑ Internal price on carbon

(7.55.3.2) Comment

In the promotion of sustainability, due consideration is given both to legislation and relevant compliance requirements in force, as well as to specific environmental evaluation criteria. Internal Carbon Pricing is also used as an additional support tool in the purchasing process, assessing energy efficiency in terms of the GHG emissions generated by energy consumption throughout the life cycle of the equipment. The "Green Banking Procurement Rules", updated in May 2026, provide for the use of internal carbon pricing in chapter 7.3 "Energy Assessment and Carbon Pricing". A tool for assigning an economic value to greenhouse gas emissions, Internal Carbon Pricing, is used for comparison purposes, which monetises the CO2 emissions generated by office machines over their entire life cycle (Life Cycle Assessment). The Structures responsible for purchasing office equipment (e.g.: Desktop and laptop computers; Monitors; Printers / multifunction devices; ATM (Automated Teller Machine) / MTA (Automatic Transactional Module) / CSA (Self Assisted Cashier)) undertake to apply responsible purchasing and usage criteria. With reference to the entire Group perimeter, the followings are the main categories of office equipment centrally purchased in 2025 with the percentages of those subject to Green Banking Procurement criteria evaluations: Laptops 78%; Mini-desktops 15%; Cash-in cash-out machines 99%; ATMs/MTAs 41%; Monitors 86%; Printers 15%; Scanner 89%.

(7.55.3.1) Method

☑ Internal incentives/recognition programs

(7.55.3.2) Comment

The 2025 Group Remuneration Policies regulate the Annual Incentive System that includes the so-called "Group cross-functional KPI "ESG"" assigned in the Performance Scorecards of Top and Middle Management, in Italy and abroad, for an overall total of approximately 3,000 resources. The ESG KPI has a weight of 10-15%. This is raised to 20% for the Chief Financial Officer, Chief Sustainability Officer and Chief Social Impact Officer. The evaluation of the ESG KPI takes place at both Group level, to recognise the commitment of the Group as a whole and at the Governance Area/Division or Sub-consolidating Group/Legal Entity level, to

enhance the action areas of individual Group structures. With specific reference to the Managing Director and CEO, for 2025 the ESG KPI (weighted at 15%) was assessed based on the following specific drivers: 1) Intesa Sanpaolo's presence in sustainability indexes of specialised companies (number of appearances); 2) promoting an inclusive work environment through the identification and implementation of targeted management actions, with a particular focus on meeting the gender equity commitments assigned to each Division/Governance: - in annual hires; - in the pools of candidates for first appointment to managerial roles; 3) Group initiatives in the ESG area:- support to green and circular economy (development of the loans of the Corporate scope from an ESG perspective; support for Green Mortgages and Social Lending of Banca dei Territori); - sustainable investments: ESG investments as a percentage of total Asset under Management (AuM);- initiatives for youth counselling and employability.

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

☑ No

C12. Environmental performance - Financial services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Banking (Bank)

(12.1.1) We measure the impact of our portfolio on the climate

☑ Yes

(12.1.2) Disclosure metric

☑ Financed emissions
☑ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

☑ No, but we plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

☑ Other, please specify :Intesa Sanpaolo decided to focus first on climate change and is refining the quantification of impacts as part of its nature-related risk assessment.

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

Intesa Sanpaolo decided to focus first on climate change. Following the 2023 pilot assessment, the integration of “other environmental risks” became part of the overall risk management, measurement and monitoring framework. In this context, the quantification of impacts is currently being refined.

(12.1.8) We measure the impact of our portfolio on water

☑ No, but we plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

☑ Other, please specify :Intesa Sanpaolo decided to focus first on climate change and is refining the quantification of impacts as part of its nature-related risk assessment.

(12.1.10) Explain why your organization does not measure its portfolio impact on water

Intesa Sanpaolo decided to focus first on climate change. Following the 2023 pilot assessment, the integration of "other environmental risks" became part of the overall risk management, measurement and monitoring framework. In this context, the quantification of impacts is currently being refined.

(12.1.11) We measure the impact of our portfolio on biodiversity

☑ No, but we plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

☑ Other, please specify :Intesa Sanpaolo decided to focus first on climate change and is refining the quantification of impacts as part of its nature-related risk assessment.

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Following the 2023 pilot assessment, the integration of "other environmental risks" became part of the overall risk management, measurement and monitoring framework. In this context, the quantification of impacts is currently being refined. In 2024 ISP prepared new "Rules on Biodiversity and Nature" adopted in January 2025, outlining its approach to biodiversity and nature, also in lending activities. The methodology takes into account the main risk drivers related to environmental risks, in terms of 1) impacts on nature: changes in nature caused by business activity which may involve potential impacts on social and economic functions; 2) dependencies on nature: aspects of ecosystem services that an organisation, or other actors, relies on to function. The methodology follows the guidelines provided by the TNFD and the LEAP process indicated by the association and, in particular, assesses the credit portfolio vulnerability exposure in relation to environmental

risks. The most relevant biodiversity pressure categories and dependencies have been prioritised for the analysis. In particular 1)impacts: indicators related to biodiversity impact are considered (both sectoral and spatial level) 2)dependencies: indicators considered (provisioning services or direct physical input depending on the reference standard – TNFD, SBTN). Several measures have been considered sourcing from: Sectoral Materiality: leveraging on input-output data matrices, sectoral scores for impact and dependency on nature are estimated taking into account country-specific information. Furthermore, "value chain" effects differentiated by country and by sector for each of the indicators under analysis have been considered; Territorial Relevance: for each nature-related risk indicator, maps have been identified, depicting the condition of the ecosystem or natural resource under analysis and therefore the level of territorial relevance; The assessment of the credit portfolio exposure to environmental risks is therefore quantified by combining both sectoral and territorial vulnerability scores and considering the exposure associated each counterparty.

Investing (Asset manager)

(12.1.1) We measure the impact of our portfolio on the climate

☑ Yes

(12.1.2) Disclosure metric

☑ Financed emissions

☑ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

☑ No, but we plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

☑ Other, please specify :Eurizon and Fideuram decided to focus first on climate change

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

Eurizon and Fideuram decided to focus first on climate change. In 2024, Eurizon has defined an internal screening methodology, called Eurizon NatureWatch, inspired by the Kunming-Montreal Global Biodiversity Framework (GBF), to identify issuers that may generate negative impacts on biodiversity caused by (i) the location of their production sites near sensitive areas and fragile ecosystems or (ii) by their own activities by analysing water usage, deforestation and pollution. The objective of this methodology is to initiate dedicated engagement activities with issues with potential impact on ecosystem exploitation. In order to assess the impacts on biodiversity and deforestation practices, Eurizon is committed to raising awareness and encouraging issuers to adopt measures aimed at combating biodiversity loss and deforestation, promoting (i) transparency in the sourcing and use of raw materials, (ii) the adoption of circular economy practices and material reuse, and (iii) a continuous commitment to more sustainable standards, including throughout the supply chain. Currently, NatureWatch is used as an engagement framework at a qualitative stage, while the quantitative component remains under refinement, taking into account evolving regulatory developments, improved data coverage and best practices.

(12.1.8) We measure the impact of our portfolio on water

☑ No, but we plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

☑ Other, please specify :Eurizon and Fideuram decided to focus first on climate change

(12.1.10) Explain why your organization does not measure its portfolio impact on water

Eurizon and Fideuram decided to focus first on climate change. In 2024, Eurizon has defined an internal screening methodology, called Eurizon NatureWatch, inspired by the Kunming-Montreal Global Biodiversity Framework (GBF), to assess companies and sectors that affect most the biodiversity by analysing water usage, deforestation and pollution. Currently, NatureWatch is used as an engagement framework at a qualitative stage, while the quantitative component remains under refinement, taking into account evolving regulatory developments, improved data coverage and best practices.

(12.1.11) We measure the impact of our portfolio on biodiversity

☑ No, but we plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

☑ Other, please specify :Eurizon and Fideuram decided to focus first on climate change

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Eurizon and Fideuram decided to focus first on climate change. In 2024, Eurizon has defined an internal screening methodology, called Eurizon NatureWatch, inspired by the Kunming-Montreal Global Biodiversity Framework (GBF), to identify issuers that may generate negative impacts on biodiversity caused by (i) the location of their production sites near sensitive areas and fragile ecosystems or (ii) by their own activities by analysing water usage, deforestation and pollution. The objective of this methodology is to initiate dedicated engagement activities with issues with potential impact on ecosystem exploitation. In order to assess the impacts on biodiversity and deforestation practices, Eurizon is committed to raising awareness and encouraging issuers to adopt measures aimed at combating biodiversity loss and deforestation, promoting (i) transparency in the sourcing and use of raw materials, (ii) the adoption of circular economy practices and material reuse, and (iii) a continuous commitment to more sustainable standards, including throughout the supply chain. Currently, NatureWatch is used as an engagement framework at a qualitative stage, while the quantitative component remains under refinement, taking into account evolving regulatory developments, improved data coverage and best practices.

Investing (Asset owner)

(12.1.1) We measure the impact of our portfolio on the climate

☑ Yes

(12.1.2) Disclosure metric

☑ Financed emissions

☑ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

☑ No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

☑ Other, please specify :Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change. Further implementations may be decided according to best practices and market evolution.

(12.1.8) We measure the impact of our portfolio on water

☑ No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

☑ Other, please specify :Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change

(12.1.10) Explain why your organization does not measure its portfolio impact on water

Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change. Further implementations may be decided according to best practices and market evolution.

(12.1.11) We measure the impact of our portfolio on biodiversity

☑ No, and we do not plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

☑ Other, please specify :Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change. Further implementations may be decided according to best practices and market evolution.

Insurance underwriting (Insurance company)

(12.1.1) We measure the impact of our portfolio on the climate

☑ Yes

(12.1.2) Disclosure metric

☑ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

☑ No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

☑ Other, please specify :Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change. Further implementations may be decided according to best practices and market evolution.

(12.1.8) We measure the impact of our portfolio on water

☑ No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

☑ Other, please specify :Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change

(12.1.10) Explain why your organization does not measure its portfolio impact on water

Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change. Further implementations may be decided according to best practices and market evolution.

(12.1.11) We measure the impact of our portfolio on biodiversity

☑ No, and we do not plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

☑ Other, please specify :Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Intesa Sanpaolo Assicurazioni decided to currently focus mainly on climate change. Further implementations may be decided according to best practices and market evolution.

(12.1.1) Provide details of your organization's financed emissions in the reporting year and in the base year.

Banking (Bank)

(12.1.1.1) Asset classes covered in the calculation

☑ Loans
☑ Project finance
☑ Bonds

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

17900000

(12.1.1.3) % of portfolio covered in relation to total portfolio value

29.7

(12.1.1.4) Total value of assets included in the financed emissions calculation

127905426000.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

33

(12.1.1.6) Emissions calculation methodology

☑ The Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)

(12.1.1.7) Weighted data quality score (for PCAF-aligned data quality scores only)

3.3

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

30400000

(12.1.1.9) Base year end

12/31/2022

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

2025 Portfolio emissions: 17.9 MtCO2e corresponds to the sum of emissions in scope for target setting on the highest-emitting sectors as indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI, and most relevant for the Group (Oil&Gas, Power Gen, Automotive, Coal mining, Iron & Steel, Commercial Real Estate-CRE, Agriculture - Primary Farming, Aluminium, Cement, Residential Real Estate-RRE), estimated to cover ca.73% of financed emissions in the highest-emitting sectors indicated by UNEP FI. Asset Class: Drawn amount on MLT loans (except for Oil&Gas which includes ST loans and bonds HTC and Coal mining with ST loans). Exposure in scope for target setting excludes SMEs (except for CRE, Agriculture – Primary Farming, Coal mining). Scope of emissions included: Oil & gas,CRE,RRE: 1,2,3; Power Gen, Iron&Steel, Coal mining, Cement, Aluminium, Agriculture – Primary Farming: 1,2; Automotive: 3 WTW. Design choices, including segment of value chain considered in-scope, scope of emissions covered and proxy methodology, defined in line with PCAF and SBTi methodologies. Sectors and related segments considered are defined according to NACE classification codes at counterparty Group level. Sector covered by target: •Oil&Gas: focus on upstream operators and integrated players. •CRE and RRE: focus on the in-use operational emissions of buildings in Italy. •Iron & Steel: focus on companies producing crude steel that use iron ore (or scrap) as an input. •Automotive revised: focus on production of light duty vehicles. •Power Gen: focus on generation and integrated players •Agriculture: focus on counterparties operating in Primary Farming sub-sector •Aluminium: focus on aluminium producers. •Cement: focus on production of clinker and cement. For the above sectors to aggregate emission intensity of each counterparty at portfolio level, a production weighted approach is applied. For methodology details and disclaimer see 2025 CLIMATE REPORT (p.138-142). % of exposure covered by target is computed dividing exposure in scope by the Group's lending portfolio. Financed emissions fell to 17.9 MtCO2e from 20.4 in 2024. % calculated using data obtained from clients: % of financed emissions collected directly from the borrower or directly from investee company (e.g. sustainability report) or indirectly via verified third-party data providers. ISP interim metrics and targets are covered by third party limited assurance.

Investing (Asset manager)

(12.1.1.1) Asset classes covered in the calculation

☑ Bonds
☑ Equity investments
☑ Other, please specify :UCIs

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

81921846

(12.1.1.3) % of portfolio covered in relation to total portfolio value

64

(12.1.1.4) Total value of assets included in the financed emissions calculation

359680000000.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

50

(12.1.1.6) Emissions calculation methodology

☑ Other, please specify :Disclosure pursuant to Article 4, paragraph 1, letter a) and article 4, paragraph 2, 3 and 4, of Regulation (EU) 2019/2088, and Articles 4 to 10 and Annex I of Delegated Regulation (EU) 2022/1288, as amended.

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

74466963

(12.1.1.9) Base year end

12/31/2022

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

The data represented refer to the assets of Eurizon Capital SGR and its EU-based Subsidiaries, Fideuram – Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland dac as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by a specialised info-provider (iv) and for Eurizon indirect, resulting from derivative financial instruments. Where deemed appropriate, the calculated values are related to the net assets managed by the EU-based subsidiaries. % of portfolio covered in relation to total portfolio value: Numerator: Indicator values were calculated as the average of portfolio valuations over the relevant quarterly portfolio evaluations (i.e., March 31, June 30, September 30, and December 31), considering the reorganisation of the Wealth Management Divisions and using the latest data made available by a specialised info-provider. Specifically, the quarterly evaluations considered were September 30 and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. Denominator: total Investing (Asset Manager) assets reported in question 1.10 (year 2025)(while the PAI statements refer to the average of the above quarterly portfolio evaluations). The methodologies described above are affected by the limited availability of data directly reported by issuers and collected by the info-provider as well as by the quality of estimations made by the latter.

Investing (Asset owner)

(12.1.1.1) Asset classes covered in the calculation

☑ Bonds

☑ Equity investments

☑ Other, please specify :UCIs

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

32063980

(12.1.1.3) % of portfolio covered in relation to total portfolio value

57.1

(12.1.1.4) Total value of assets included in the financed emissions calculation

103412668000.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

50

(12.1.1.6) Emissions calculation methodology

☑ Other, please specify :PAI art. 4 SFDR

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

34405370

(12.1.1.9) Base year end

12/31/2022

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

The data represented refer to the assets of ISP Assicurazioni as stated in the PAI statements. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated considering all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by info-provider. Scope 3 GHG emissions are estimated. In the future it is envisaged that reliance will be placed upon the values reported directly by the companies. For 2025 indicators, where information on companies benefiting from investment and/or sovereign issuers is not available, the average value calculated on the basis of available data was assigned. In the absence of timely data from the investee companies, estimates made by the info-provider based on internal methodologies are used in the calculation. As a result, the value of the PAI indicator may be overestimated or underestimated. % of portfolio covered in relation to total portfolio value: Numerator: Indicator values were calculated as the average of portfolio valuations over four quarterly portfolio evaluation (i.e., March 31, June 30, September 30, and December 31), using the latest data made available by the specialised info-provider. Denominator: total Asset Owner division assets reported in question 1.10 (year 2025) (while the PAI statements refer to the average of the above four quarterly portfolio evaluations). % of financed emissions calculated using data obtained from clients/investees: the value expressed represents the percentage of data, related to PAI 2, that the info-provider obtained directly from issuers. The data provider states that data directly reported by investee companies are around 50% (for scopes 1+2 of GHG based indicators). Asset classes covered in the calculation: direct and indirect exposures to Equity investments, Corporates Bond and the Corporate component of the UCIs. For the year 2022, the value calculated using the same methodology as for 2023 is indicated in column 8, to enhance comparability of the figures across different reporting periods.

(12.1.3) Provide details of the other metrics used to track the impact of your portfolio on the environment.

Climate change

(12.1.3.1) Portfolio

☑ Banking (Bank)

(12.1.3.2) Portfolio metric

☑ Portfolio carbon footprint (tCO2e/Million invested)

(12.1.3.3) Metric value in the reporting year

100

(12.1.3.4) % of portfolio covered in relation to total portfolio value

29.7

(12.1.3.5) Total value of assets included in the calculation

128000000000

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

33

(12.1.3.7) Please explain the details and key assumptions used in your assessment

In line with the UNEP FI guidelines, ISP reports on physical intensity, absolute financed emissions and Portfolio carbon footprint MtCO2e/bn€ lent, because each represent, in different ways, the impact of the Bank's portfolio on the environment. Metric value of around 0.1 MtCO2e/bn€ lent. Ratio between financed (lent) emissions in scope (numerator) and total of lent exposure (denominator) in scope. Perimeter in scope: the priority highest-emitting sectors as indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI and most relevant for the Group (Oil&Gas, Power, Automotive, Coal mining, Iron&Steel, Commercial Real Estate-CRE, Agriculture -Primary Farming, Aluminium, Cement, Residential Real Estate-RRE), estimated to cover ca.73% of financed emissions in the highest-emitting sectors indicated in the 'Guidelines for Climate Target Setting for Banks' by UNEP FI. Asset Class: Drawn amount on MLT loans (except for Oil&Gas which includes ST loans and bonds HTC and Coal mining with ST loans). Exposure in scope for target setting excludes SMEs (except for CRE, Agriculture – Primary Farming, Coal mining). Scope of emissions included: Oil & gas, CRE, RRE: 1,2,3; Power Gen, Iron&Steel, Coal mining, Cement, Aluminium, Agriculture – Primary Farming: 1,2; Automotive: 3 WTW. Design choices, including segment of value chain considered in-scope, scope of emissions covered and proxy methodology, defined in line with PCAF and SBTi methodologies. Sectors and related segments considered are defined according to NACE classification codes at counterparty Group level. Sector covered by target: •Oil&Gas: focus on upstream operators and integrated players. •CRE and RRE: focus on the in-use operational emissions of buildings in Italy. •Iron & Steel: focus on companies producing crude steel that use iron ore (or scrap) as an input. •Automotive revised: focus on production of light duty vehicles. •Power Gen: focus on generation and integrated players •Agriculture: focus on counterparties operating in Primary Farming sub-sector •Aluminium: focus on aluminium producers. •Cement: focus on production of clinker and cement. For the above sectors to aggregate emission intensity of each counterparty at portfolio level, a production weighted approach is applied. For methodology details and disclaimer see 2025 CLIMATE REPORT (pp 138-142). The % of exposure covered by target is computed dividing exposure in scope by the total Group's lending portfolio. % calculated using data obtained from clients: % of financed emissions collected directly from the borrower or investee company directly (e.g., sustainability report) or indirectly via verified third-party data providers. ISP interim metrics and targets are covered by third party limited assurance.

Climate change

(12.1.3.1) Portfolio

☑ Investing (Asset owner)

(12.1.3.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

348

(12.1.3.4) % of portfolio covered in relation to total portfolio value

57.1

(12.1.3.5) Total value of assets included in the calculation

103482058048

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

50

(12.1.3.7) Please explain the details and key assumptions used in your assessment

An explanation as to why the metric was chosen: the Portfolio Reference Level target uses the WACI as Carbon Intensity measure to monitor the performance of the Portfolio in Scope. WACI was chosen because it is a measure of carbon emissions normalised by revenues, which is a relevant comparison point across all issuers. The data represented refer to the assets of ISP Assicurazioni as stated in the PAI statements. Where appropriate, impact indicators were calculated considering

relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by info-provider. Scope 3 GHG emissions are estimated. In the future it is envisaged that reliance will be placed upon the values reported directly by the companies. For 2025 indicators, where information on companies benefiting from investment and/or sovereign issuers is not available, the average value calculated on the basis of available data was assigned. In order to comply with the request for best efforts made by current regulation, in the absence of timely data from the investee companies, estimates made by the info-provider based on internal methodologies are used in the calculation. As a result, the value of the PAI indicator may be overestimated or underestimated. % of portfolio covered in relation to total portfolio value: Numerator: indicator values were calculated as the average of portfolio valuations over four quarterly portfolio evaluation (i.e., March 31, June 30, September 30, and December 31), using the latest data made available by the specialised info-provider. Denominator: total Asset Owner division assets reported in question 1.10 (year 2025) (while the PAI statements refer to the average of the above four quarterly portfolio evaluations). % of financed emissions calculated using data obtained from clients/investees: the value expressed represents the percentage of data, related to PAI 2, that the info-provider obtained directly from issuers. The data provider states that data directly reported by investee companies are around 50% (for scopes 1+ 2 of GHG based indicators). Asset classes covered in the calculation: direct and indirect exposures to Equity investments, Corporates Bond and the Corporate component of the UCIs.

Climate change

(12.1.3.1) Portfolio

☑ Investing (Asset manager)

(12.1.3.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

406

(12.1.3.4) % of portfolio covered in relation to total portfolio value

42

(12.1.3.5) Total value of assets included in the calculation

237969058518

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

50

(12.1.3.7) Please explain the details and key assumptions used in your assessment

An explanation as to why the metric was chosen: the Portfolio Reference Level target uses the WACI as Carbon Intensity measure to monitor the performance of the Portfolio in Scope. WACI was chosen because it is a measure of carbon emissions normalised by revenues, which is a relevant comparison point across all issuers. The data represented refer to the assets of Eurizon Capital SGR and its EU-based Subsidiaries as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by a specialised info-provider (iv) and indirect, resulting from derivative financial instruments. Where deemed appropriate, the calculated values are related to the net assets managed by the EU-based subsidiaries. % of portfolio covered in relation to total portfolio value: Numerator: indicator values were calculated as the average of portfolio valuations over the relevant quarterly portfolio evaluation (i.e., March 31, June 30, September 30, and December 31), considering the reorganisation of the Wealth Management Divisions and using the latest data made available by a specialised info-provider. Specifically, the quarterly evaluations considered were September 30, and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. Denominator: total Investing (Asset Manager) assets reported in question 1.10 (year 2025) (while the PAI statements refer to the average of the above quarterly portfolio evaluations). The methodologies described above are affected by the limited availability of data directly reported by issuers and collected by the info-provider as well as by the quality of estimations made by the latter. % of emissions calculated using data obtained from clients/investees: Eurizon relies on a specialised info-provider for data input. However, the data provider states that data directly reported by investee companies are around 50% (for scopes 1+ 2 and 3 of GHG based indicators).

Climate change

(12.1.3.1) Portfolio

☑ Investing (Asset manager)

(12.1.3.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

508

(12.1.3.4) % of portfolio covered in relation to total portfolio value

13

(12.1.3.5) Total value of assets included in the calculation

70972366534

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

50

(12.1.3.7) Please explain the details and key assumptions used in your assessment

An explanation as to why the metric was chosen: the Portfolio Reference Level target uses the WACI as Carbon Intensity measure to monitor the performance of the Portfolio in Scope. WACI was chosen due to the relevance of the indicator for the identification and prioritisation of the principal adverse impacts of the investment on sustainability factors. Furthermore, WACI is a measure of carbon emissions normalised by revenues, which is a relevant comparison point across all issuers. The data represented refer to the assets of Fideuram – Intesa Sanpaolo Private Banking as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by a specialised info-provider. Where deemed appropriate, the calculated values are related to the net assets managed by the EU-based subsidiaries. % of portfolio covered in relation to total portfolio value: Numerator: indicator values were calculated as the average of portfolio valuations over the relevant quarterly portfolio evaluations (i.e., March 31, June 30,

September 30, and December 31) considering the reorganisation of the Wealth Management Divisions and using the latest data made available by a specialised info-provider. Specifically, the quarterly evaluations considered were September 30, and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. Denominator: total Investing (Asset Manager) assets reported in question 1.10 (year 2025) (while the PAI statements refer to the average of the above quarterly portfolio evaluations). The methodologies described above are affected by the limited availability of data directly reported by issuers and collected by the info-provider as well as by the quality of estimations made by the latter. % of emissions calculated using data obtained from clients/investees: Fideuram – Intesa Sanpaolo Private Banking relies on a specialised info-provider for data input. However, the data provider states that data directly reported by investee companies are around 50% (for scopes 1 + 2 and 3 of GHG based indicators).

Climate change

(12.1.3.1) Portfolio

☑ Investing (Asset manager)

(12.1.3.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

519

(12.1.3.4) % of portfolio covered in relation to total portfolio value

9

(12.1.3.5) Total value of assets included in the calculation

50516686910

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

50

(12.1.3.7) Please explain the details and key assumptions used in your assessment

An explanation as to why the metric was chosen: the Portfolio Reference Level target uses the WACI as Carbon Intensity measure to monitor the performance of the Portfolio in Scope. WACI was chosen due to the relevance of the indicator for the identification and prioritisation of the principal adverse impacts of the investment on sustainability factors. Furthermore, WACI is a measure of carbon emissions normalised by revenues, which is a relevant comparison point across all issuers. The data represented refer to the assets of Fideuram Asset Management Ireland dac as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by a specialised info-provider. Where deemed appropriate, the calculated values are related to the net assets managed by the EU-based subsidiaries. % of portfolio covered in relation to total portfolio value: Numerator: indicator values were calculated as the average of the relevant portfolio valuations over four quarterly portfolio evaluations (i.e., March 31, June 30, September 30, and December 31), considering the reorganisation of the Wealth Management Divisions and using the latest data made available by a specialised info-provider. Specifically, the quarterly evaluations considered were September 30, and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. Denominator: total Investing (Asset Manager) assets reported in question 1.10 (year 2025) (while the PAI statements refer to the average of the above quarterly portfolio evaluations). The methodologies described above are affected by the limited availability of data directly reported by issuers and collected by the info-provider as well as by the quality of estimations made by the latter. % of emissions calculated using data obtained from clients/investees: Fideuram Asset Management Ireland dac relies on a specialised info-provider for data input. However, the data provider states that data directly reported by investee companies are around 50% (for scopes 1 + 2 and 3 of GHG based indicators).

Climate change

(12.1.3.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.1.3.2) Portfolio metric

☑ Other metric for impact on climate change please specify :Weighted average carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

98.2

(12.1.3.4) % of portfolio covered in relation to total portfolio value

1

(12.1.3.5) Total value of assets included in the calculation

6074456

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

1

(12.1.3.7) Please explain the details and key assumptions used in your assessment

An explanation as to why the metric was chosen: the Portfolio Reference Level target uses the WACI as Carbon Intensity measure to monitor the performance of the Portfolio in Scope. WACI was chosen because it is a measure of carbon emissions normalised by revenues, which is a relevant comparison point across all issuers. The data represented refer to the assets of Intesa Sanpaolo Protezione (the insurance underwriting company). Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. However, at the moment, the coverage is limited by the scope of the available methodology to account for and report on GHG emissions associated with re/insurance portfolios (the PCAF Insurance-Associated Emissions Standard) and the availability of emissions data from/or in relation to underlying reinsurers. The Insurance-associated emissions are always calculated by multiplying an attribution factor by the absolute GHG scope 1 and 2 emissions of the re/insured client or asset in accordance with PCAF methodology. % of financed emissions calculated using data obtained from clients/investees: the value expressed represents the percentage of emissions (out of total emissions in scope) where data are obtained directly from companies' Non-Financial Statement. Portfolio covered in the calculation: Corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability). % of portfolio covered in relation to total portfolio value: since premiums in scope were used as numerator, the total Underwriting division premiums were used as denominator (the data differs from total assets reported in question 1.10).

(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

	Portfolio breakdown	Please explain why you do not provide a breakdown of your portfolio impact on the climate
Banking (Bank)	Yes ☑ Yes, by asset class ☑ Yes, by industry ☑ Yes, by scope	
Investing (Asset manager)	Yes ☑ Yes, by scope	*Present disclosure is limited to data requested by other disclosure (PAI)*
Investing (Asset owner)	Yes ☑ Yes, by scope	*Present disclosure is limited to data requested by other disclosure (PAI)*
Insurance underwriting (Insurance company)	Yes ☑ Yes, by industry	*Present disclosure is limited to data requested by other disclosure (WACI)*

(12.2.1) Break down your organization’s financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Fossil Fuels

(12.2.1.7) Value of assets covered in the calculation

3100000000

(12.2.1.8) Financed emissions or alternative metric

10900000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Oil&Gas. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Power generation

(12.2.1.7) Value of assets covered in the calculation

7600000000

(12.2.1.8) Financed emissions or alternative metric

1400000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Power Generation. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Manufacturing

(12.2.1.7) Value of assets covered in the calculation

1800000000

(12.2.1.8) Financed emissions or alternative metric

1100000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Automotive. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Fossil Fuels

(12.2.1.7) Value of assets covered in the calculation

8000000

(12.2.1.8) Financed emissions or alternative metric

49000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Coal mining and not on the whole Coal sector. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Materials

(12.2.1.7) Value of assets covered in the calculation

900000000

(12.2.1.8) Financed emissions or alternative metric

1000000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Iron&Steel. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Infrastructure

(12.2.1.7) Value of assets covered in the calculation

6400000000

(12.2.1.8) Financed emissions or alternative metric

400000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Commercial Real Estate(CRE) Italian perimeter. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 1

(12.2.1.7) Value of assets covered in the calculation

12723145436

(12.2.1.8) Financed emissions or alternative metric

3720520

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

ISP had made precise choices when setting the perimeter of the value chain. For each sector, the scope of emissions was selected to maximise the share of emissions captured. Oil&Gas: Scope 1, 2 and 3; Power Generation: Scope 1 and 2; Automotive: Scope 3 WTW; Iron&Steel: Scope 1 and 2; Commercial Real Estate

(CRE): Scope 1, 2 and 3; Coal mining: Scope 1 and 2; Agriculture – Primary Farming: Scope 1 and 2; Aluminium: Scope 1 and 2; Cement: Scope 1 and 2; Residential Real Estate (RRE): Scope 1, 2 and 3. Scope selections are aligned with market practices, cover the bulk of industry's emissions and are the data typically disclosed by industry players. The sum of emissions broken down by scope does not correspond to the value of the banking financed emissions for 2025 reported in question 12.1.1, because, for Commercial Real Estate, Aluminium, Residential Real Estate, and Coal mining, it was not possible to separately detail Scope 1,2, and 3 emissions. Therefore, these sectors were not included in the calculation of column 8.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 2

(12.2.1.7) Value of assets covered in the calculation

12723145436

(12.2.1.8) Financed emissions or alternative metric

527989

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

ISP had made precise choices when setting the perimeter of the value chain. For each sector, the scope of emissions was selected to maximise the share of emissions captured. Oil&Gas: Scope 1, 2 and 3; Power Generation: Scope 1 and 2; Automotive: Scope 3 WTW; Iron&Steel: Scope 1 and 2; Commercial Real Estate (CRE): Scope 1, 2 and 3; Coal mining: Scope 1 and 2; Agriculture – Primary Farming: Scope 1 and 2; Aluminium: Scope 1 and 2; Cement: Scope 1 and 2; Residential Real Estate (RRE): Scope 1, 2 and 3. Scope selections are aligned with market practices, cover the bulk of industry's emissions and are the data typically disclosed by industry players. The sum of emissions broken down by scope does not correspond to the value of the banking financed emissions for 2025 reported in question 12.1.1, because, for Commercial Real Estate, Aluminium, Residential Real Estate, and Coal mining, it was not possible to separately detail scope 1,2, and 3 emissions. Therefore, these sectors were not included in the calculation of column 8.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 3

(12.2.1.7) Value of assets covered in the calculation

4944808750

(12.2.1.8) Financed emissions or alternative metric

11167265

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

ISP had made precise choices when setting the perimeter of the value chain. For each sector, the scope of emissions was selected to maximise the share of emissions captured. Oil&Gas: Scope 1, 2 and 3; Power Generation: Scope 1 and 2; Automotive: Scope 3 WTW; Iron&Steel: Scope 1 and 2; Commercial Real Estate (CRE): Scope 1, 2 and 3; Coal mining: Scope 1 and 2; Agriculture – Primary Farming: Scope 1 and 2; Aluminium: Scope 1 and 2; Cement: Scope 1 and 2; Residential Real Estate (RRE): Scope 1, 2 and 3. Scope selections are aligned with market practices, cover the bulk of industry's emissions and are the data typically disclosed by industry players. The sum of emissions broken down by scope does not correspond to the value of the banking financed emissions for 2025 reported in question 12.1.1, because, for Commercial Real Estate, Aluminium, Residential Real Estate, and Coal mining, it was not possible to separately detail scope 1,2, and 3 emissions. Therefore, these sectors were not included in the calculation of column 8.

0

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

☑ Loans

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

29

(12.2.1.7) Value of assets covered in the calculation

124063010026

(12.2.1.8) Financed emissions or alternative metric

16292859

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The 2025 Climate report details for each of the sector chosen the asset classes which have been considered within the target setting exercise. These are also reported in the "Asset class" column. Discrepancies between the sum of emissions broken down by asset class and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

1

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

☑ Project finance

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

25

(12.2.1.7) Value of assets covered in the calculation

3525937703

(12.2.1.8) Financed emissions or alternative metric

317235

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The 2025 Climate report details for each of the sector chosen the asset classes which have been considered within the target setting exercise. These are also reported in the "Asset class" column. Discrepancies between the sum of emissions broken down by asset class and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

☑ Bonds

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

0.6

(12.2.1.7) Value of assets covered in the calculation

428421409

(12.2.1.8) Financed emissions or alternative metric

1178308

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The 2025 Climate report details for each of the sector chosen the asset classes which have been considered within the target setting exercise. These are also reported in the "Asset class" column. Discrepancies between the sum of emissions broken down by asset class and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Investing (Asset owner)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 1

(12.2.1.7) Value of assets covered in the calculation

103482058048

(12.2.1.8) Financed emissions or alternative metric

3121312

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The data represented refer to the assets of ISP Assicurazioni as stated in the PAI statements. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions Scope 1" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by info-provider. The Group based its assessments on the values of the PAI indicators presented by the info-provider at the level of each individual fund (CIUs, ETFs,...), subsequently traced back to the reality of its portfolio, using specific formulas, and taking into account, for example, the amount invested in an individual fund and the total value of the Group's investments, and does not perform a "look-through" analysis in order to identify the investments underlying indirect investments. For 2025 indicators, where information on companies benefiting from investment and/or sovereign issuers is not available, the average value calculated on the basis of available data was assigned. In order to comply with the request for best efforts made by current regulation, in the absence of timely data from the investee companies, estimates made by the info-provider based on internal methodologies are used in the calculation. As a result, the value of the PAI indicator may be overestimated or underestimated. Value of assets covered in the calculation: indicator values were calculated as the average of portfolio valuations over four quarterly portfolio evaluation (i.e., March 31, June 30, September 30, and December 31), using the latest data made available by the specialised info-provider. Asset classes covered in the calculation: direct and indirect exposures to Equity investments, Corporates Bond and the Corporate component of the UCIs. Discrepancies between the sum of emissions broken down by scope and the total value of asset owner financed emissions 2025 reported in question 12.1.1 are attributable to the information given to the data provider for the calculation.

4

(12.2.1.1) Portfolio

☑ Investing (Asset owner)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients’/investees’ scope

☑ Scope 2

(12.2.1.7) Value of assets covered in the calculation

103482058048

(12.2.1.8) Financed emissions or alternative metric

656516

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The data represented refer to the assets of ISP Assicurazioni as stated in the PAI statements. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the “GHG emissions Scope 2” indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by info-provider. The Group based its assessments on the values of the PAI indicators presented by the info-provider at the level of each individual fund (CIUs, ETFs,...), subsequently traced back to the reality of its portfolio, using specific formulas, and taking into account, for example, the amount invested in an individual fund and the total value of the Group's investments, and does not perform a “look-through” analysis in order to identify the investments underlying indirect investments. For 2025 indicators, where information on companies benefiting from investment and/or sovereign issuers is not available, the average value calculated on the basis of available data was assigned. In order to comply with the request for best efforts made by current regulation, in the absence of timely data from the investee companies, estimates made by the info-provider based on internal methodologies are used in the calculation. As a result, the value of the PAI indicator may be overestimated or underestimated. Value of assets covered in the calculation: indicator values were calculated as the average of portfolio valuations over four quarterly portfolio evaluation (i.e., March 31, June 30, September 30, and December 31), using the latest data made available by the specialised info-provider. Asset classes covered in the calculation: direct and indirect exposures to Equity investments, Corporates Bond and the Corporate component of the UCIs. Discrepancies between the sum of emissions broken down by scope and the total value of asset owner financed emissions 2025 reported in question 12.1.1 are attributable to the information given to the data provider for the calculation.

(12.2.1.1) Portfolio

☑ Investing (Asset owner)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 3

(12.2.1.7) Value of assets covered in the calculation

103482058048

(12.2.1.8) Financed emissions or alternative metric

27149326

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The data represented refer to the assets of ISP Assicurazioni as stated in the PAI statements. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions Scope 3" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from

the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by info-provider. The Group based its assessments on the values of the PAI indicators presented by the info-provider at the level of each individual fund (CIUs, ETFs,...), subsequently traced back to the reality of its portfolio, using specific formulas, and taking into account, for example, the amount invested in an individual fund and the total value of the Group's investments, and does not perform a "look-through" analysis in order to identify the investments underlying indirect investments. For 2025 indicators, where information on companies benefiting from investment and/or sovereign issuers is not available, the average value calculated on the basis of available data was assigned. In order to comply with the request for best efforts made by current regulation, in the absence of timely data from the investee companies, estimates made by the info-provider based on internal methodologies are used in the calculation. As a result, the value of the PAI indicator may be overestimated or underestimated. Value of assets covered in the calculation: indicator values were calculated as the average of portfolio valuations over four quarterly portfolio evaluation (i.e., March 31, June 30, September 30, and December 31), using the latest data made available by the specialised info-provider. Asset classes covered in the calculation: direct and indirect exposures to Equity investments, Corporates Bond and the Corporate component of the UCIs. Discrepancies between the sum of emissions broken down by scope and the total value of asset owner financed emissions 2025 reported in question 12.1.1 are attributable to the information given to the data provider for the calculation.

(12.2.1.1) Portfolio

☑ Investing (Asset manager)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 1

(12.2.1.7) Value of assets covered in the calculation

359458111961

(12.2.1.8) Financed emissions or alternative metric

8087489

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The data represented refer to the assets of Eurizon Capital SGR and its EU-based Subsidiaries, Fideuram – Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland dac as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Scope 1 is calculated on all equity/corporate bonds with available data, subject to info-provider coverage. Value of assets covered in the calculation: data were calculated as the average of portfolio valuations over the relevant quarterly surveys (i.e., March 31, June 30, September 30, and December 31), considering the reorganisation of the Wealth Management Divisions. Specifically, the quarterly evaluations considered were September 30, and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. With regard to 'Private markets', assessing negative impacts depends on the availability and quality of data and also to the absence of information sources and structured corporate reporting, therefore, for technical reasons it may not be identifiable. In this respect, given the nature of private markets investments, the contribution of such investments could not be taken into account when calculating impact indicators. For further details see PAI statements. Coverage materiality ranges: for each indicator, coverage is calculated in relation to exposure to asset classes relevant to the specific metric. Direct and indirect investments in corporate bonds and equities for PAIs 1-14 and direct and indirect investments in bonds of sovereign issuers for PAIs 15-16. Discrepancies between the sum of emissions broken down by scope and the total value of asset management financed emissions 2025 reported in question 12.1.1 are attributable to the information given to the data provider for the calculation.

(12.2.1.1) Portfolio

☑ Investing (Asset manager)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients’/investees’ scope

☑ Scope 2

(12.2.1.7) Value of assets covered in the calculation

359458111961

(12.2.1.8) Financed emissions or alternative metric

1794937

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The data represented refer to the assets of Eurizon Capital SGR and its EU-based Subsidiaries, Fideuram – Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland dac as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Scope 2 is calculated on all equity/corporate bonds with available data, subject to info-provider coverage. Value of assets covered in the calculation: data were calculated as the average of portfolio valuations over the relevant quarterly surveys (i.e., March 31, June 30, September 30, and December 31), considering the reorganisation of the Wealth Management Divisions. Specifically, the quarterly evaluations considered were September 30, and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. With regard to ‘Private markets’, assessing negative impacts depends on the availability and quality of data and also to the absence of information sources and structured corporate reporting, therefore, for technical reasons it may not be identifiable. In this respect, given the nature of private markets investments, the contribution of such investments could not be taken into account when calculating impact indicators. For further details see PAI statements. Coverage materiality ranges: for each indicator, coverage is calculated in relation to exposure to asset classes relevant to the specific metric. Direct and indirect investments in corporate bonds and equities for PAIs 1-14 and direct and indirect investments in bonds of sovereign issuers for PAIs 15-16. Discrepancies between the sum of emissions broken down by scope and the total value of asset management financed emissions 2025 reported in question 12.1.1 are attributable to the information given to the data provider for the calculation.

(12.2.1.1) Portfolio

☑ Investing (Asset manager)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

☑ Scope 3

(12.2.1.7) Value of assets covered in the calculation

359458111961

(12.2.1.8) Financed emissions or alternative metric

71772931

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

The data represented refer to the assets of Eurizon Capital SGR and its EU-based Subsidiaries, Fideuram – Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland dac as stated in the PAI statements. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Scope 3 is calculated on all equity/corporate bonds with available data, subject to info-provider coverage. Value of assets covered in the calculation: data were calculated as the average of portfolio valuations over the relevant quarterly surveys (i.e.,

March 31, June 30, September 30, and December 31), considering the reorganisation of the Wealth Management Divisions. Specifically, the quarterly evaluations considered were September 30, and December 31 for Eurizon Capital SGR and Fideuram – Intesa Sanpaolo Private Banking; March 31, June 30, September 30, and December 31 for Fideuram Asset Management Ireland dac. With regard to 'Private markets', assessing negative impacts depends on the availability and quality of data and also to the absence of information sources and structured corporate reporting, therefore, for technical reasons it may not be identifiable. In this respect, given the nature of private markets investments, the contribution of such investments could not be taken into account when calculating impact indicators. For further details see PAI statements. Coverage materiality ranges: for each indicator, coverage is calculated in relation to exposure to asset classes relevant to the specific metric. Direct and indirect investments in corporate bonds and equities for PAIs 1-14 and direct and indirect investments in bonds of sovereign issuers for PAIs 15-16. Discrepancies between the sum of emissions broken down by scope and the total value of asset management financed emissions 2025 reported in question 12.1.1 are attributable to the information given to the data provider for the calculation.

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Apparel

(12.2.1.7) Value of assets covered in the calculation

325084

(12.2.1.8) Financed emissions or alternative metric

8.17

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Fossil Fuels

(12.2.1.7) Value of assets covered in the calculation

50777

(12.2.1.8) Financed emissions or alternative metric

2.9

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Infrastructure

(12.2.1.7) Value of assets covered in the calculation

1021598

(12.2.1.8) Financed emissions or alternative metric

58.86

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Manufacturing

(12.2.1.7) Value of assets covered in the calculation

667590

(12.2.1.8) Financed emissions or alternative metric

5.78

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Retail

(12.2.1.7) Value of assets covered in the calculation

253920

(12.2.1.8) Financed emissions or alternative metric

0.68

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability)

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Services

(12.2.1.7) Value of assets covered in the calculation

2833989

(12.2.1.8) Financed emissions or alternative metric

1.81

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Transportation services

(12.2.1.7) Value of assets covered in the calculation

610920

(12.2.1.8) Financed emissions or alternative metric

5.52

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Food, beverage & agriculture

(12.2.1.7) Value of assets covered in the calculation

62145

(12.2.1.8) Financed emissions or alternative metric

1.6

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Materials

(12.2.1.7) Value of assets covered in the calculation

87937

(12.2.1.8) Financed emissions or alternative metric

12.42

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Insurance underwriting (Insurance company)

(12.2.1.2) Portfolio metric

☑ Weighted average carbon intensity (tCO2e/Million revenue)

(12.2.1.3) Industry

☑ Hospitality

(12.2.1.7) Value of assets covered in the calculation

160496

(12.2.1.8) Financed emissions or alternative metric

0.48

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Industry: GICS codes were used for the exercise, data were converted into the format required by CDP's Activity Classification System. Intesa Sanpaolo Protezione effected the calculation of WACI for a part of its insurance underwriting portfolio in line with national and international regulations and best practices. Portfolio covered in the calculation: corporate clients with highest-impact portfolio and tailor-made products (retail SMEs were excluded due to data availability).

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Food, beverage & agriculture

(12.2.1.7) Value of assets covered in the calculation

900000000

(12.2.1.8) Financed emissions or alternative metric

900000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Agriculture - Primary Farming. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-

documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Materials

(12.2.1.7) Value of assets covered in the calculation

200000000

(12.2.1.8) Financed emissions or alternative metric

100000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Aluminium. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Materials

(12.2.1.7) Value of assets covered in the calculation

200000000

(12.2.1.8) Financed emissions or alternative metric

300000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Cement. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf).

(12.2.1.1) Portfolio

☑ Banking (Bank)

(12.2.1.2) Portfolio metric

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

☑ Infrastructure

(12.2.1.7) Value of assets covered in the calculation

106900000000

(12.2.1.8) Financed emissions or alternative metric

1800000

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

☑ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Sector: focus on Residential Real Estate (RRE) Italian perimeter. Starting from 2021 we have progressively set targets for 10 sectors: Oil&Gas, Power Generation, Automotive, Coal mining, Commercial Real Estate, Iron&Steel, Agriculture – Primary Farming, Aluminium, Cement, Residential Real Estate. For further details, see the section "Methodology: Target Setting on Lending Activities" of 2025 Climate Report (https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/2025_Climate_Report.pdf). Discrepancies between the sum of emissions broken down by sector and the total value of banking financed emissions for 2025 reported in question 12.1.1 are due to approximations.

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Lending to all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

5172000000

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

599000000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

1.2

(12.3.6) Details of calculation

The data are derived from Pillar 3 disclosure as of 31/12/2025. ISP based its classification of fossil fuel on the NACE codes of counterparties in Pillar 3 ESG, identifying the following as coal, oil and gas exposures: Coal: NACE B05 ('Mining of coal and lignite') and C19.1 ('Manufacture of coke oven products'). Oil: NACE B06.1 ('Extraction of crude petroleum') and B09.1 ('Support activities for petroleum and natural gas extraction'), as well as C19.2 ('Manufacture of refined petroleum products'). Gas: NACE B06.2 ('Extraction of natural gas'), D35.21 ('Manufacture of gas'), and H49.50 ('Transport via pipeline'). Column 5 “% of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year”: value of the fossil fuel assets (Column 2) out of total portfolio value in reporting year as disclosed in question 1.10.

Lending to thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

8000000

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

The data are derived from Pillar 3 disclosure as of 31/12/2025. For the purposes of this questionnaire, all NACE B05 ('Mining of coal and lignite') references to coal mining exposure have been defined as 'thermal'. Please note that the Group confirms the achievement in 2025 of the phase-out for its exposure to counterparties active in the coal mining sector, according to the 'Rules for lending operations in the coal sector'; a marginal amount remains, mainly attributable to a non-performing exposure. Column 5 “% of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year”: value of the fossil fuel assets (Column 2) out of total portfolio value in reporting year as disclosed in question 1.10.

Lending to met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

2000000

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

The data are derived from Pillar 3 disclosure as of 31/12/2025. For the purposes of this questionnaire, all references to coal mining exposure in NACE B05 ('Mining of coal and lignite') have been defined as 'thermal', while exposures reported as 'met coal' refer to NACE C19.1 ('Manufacture of coke oven products'). Column 5 "% of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year": value of the fossil fuel assets (Column 2) out of total portfolio value in reporting year as disclosed in question 1.10.

Lending to oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

3102000000

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

104000000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.7

(12.3.6) Details of calculation

The data are derived from Pillar 3 disclosure as of 31/12/2025. For the purposes of this questionnaire, the exposures reported in Pillar 3 under NACE codes B06.1 ('Extraction of crude petroleum'), B09.1 ('Support activities for petroleum and natural gas extraction') and C19.2 ('Manufacture of refined petroleum products') have been reported as 'oil'. Column 5 "% of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year": value of the fossil fuel assets (Column 2) out of total portfolio value in reporting year as disclosed in question 1.10.

Lending to gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

2060000000

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

495000000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.5

(12.3.6) Details of calculation

The data are derived from Pillar 3 disclosure as of 31/12/2025. For the purposes of this questionnaire, exposures reported in Pillar 3 under the following NACE codes have been reported as 'gas': B06.2 ('Extraction of natural gas'), D35.21 (‘Manufacture of gas'), H49.50 ('Transport via pipeline'). Column 5 “% of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year”: value of the fossil fuel assets (Column 2) out of total portfolio value in reporting year as disclosed in question 1.10.

Investing in all fossil fuel assets (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

18615628424

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

5.2

(12.3.6) Details of calculation

The data represented refer to the assets of Eurizon Capital SGR and its EU-based Subsidiaries, Fideuram – Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland dac as stated in the PAI statements, PAI 4 – Exposure to companies operating in the fossil fuels sector (the exposure of the investees to activities related to fossil fuels sector, including extraction, processing, storage and transport of oil, gas natural gas and coal products). The data represented refer to the assets issued by the Company. The Statement does not apply to the portfolios conferred for management by other financial market participants, according to the management mandates concluded with each of them. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the “GHG emissions” indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect,

resulting from third-party UCIs, as provided by a specialised info-provider (iv) and for Eurizon indirect, resulting from derivative financial instruments. Where deemed appropriate, the calculated values are related to the net assets managed by the EU-based subsidiaries. % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year (Eurizon + Fideuram): as denominator we selected the PAI statements perimeter of Eurizon and Fideuram. The methodologies described above are affected by the limited availability of data directly reported by issuers and collected by the info-provider as well as by the quality of estimations made by the latter. Asset classes covered in the calculation: direct and indirect exposures to Equity investments and Bonds.

Investing in thermal coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative. Eurizon and Fideuram are committed to fine-tuning the portfolio impact analysis, including further developments where material. In addition, Eurizon and Fideuram are committed to continuously refining their Sustainability Policies.

Investing in met coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative Eurizon and Fideuram are committed to fine-tuning the portfolio impact analysis, including further developments where material. In addition, Eurizon and Fideuram are committed to continuously refining their Sustainability Policies.

Investing in oil (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative. Eurizon and Fideuram are committed to fine-tuning the portfolio impact analysis, including further developments where material. In addition, Eurizon and Fideuram are committed to continuously refining their Sustainability Policies.

Investing in gas (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Eurizon and Fideuram already provide the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative. Eurizon and Fideuram are committed to fine-tuning the portfolio impact analysis, including further developments where material. In addition, Eurizon and Fideuram are committed to continuously refining their Sustainability Policies.

Investing all fossil fuel assets (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

7063212000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

3.9

(12.3.6) Details of calculation

The data represented refer to the assets of ISP Assicurazioni as stated in the PAI statements. Where appropriate, impact indicators were calculated considering relevant portfolio exposures, depending on the data available for the calculation. For example, direct and indirect investments in companies for which relevant data were available were considered in the calculation of the "GHG emissions" indicator. The PAI indicator data for the year 2025 was calculated taking into consideration all investments in beneficiary companies and sovereign issuers (i) direct, resulting from equity and bond financial instruments, (ii) indirect, resulting from the portfolios of linked UCIs, (iii) indirect, resulting from third-party UCIs, as provided by info-provider. % of portfolio covered in relation to total portfolio value: indicator values were calculated as the average of portfolio valuations over four quarterly portfolio evaluations (i.e., March 31, June 30, September 30, and December 31), using the latest data made available by the specialised info-provider; the total Asset Owner division assets reported in question 1.10 (year 2025) were used as denominator (while the PAI statements refer to the average of the above four quarterly portfolio evaluations). Asset classes covered in the calculation: direct and indirect exposures to Equity investments, Corporates Bond and the Corporate component of the UCIs.

Investing in thermal coal (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :The Insurance Division already provides the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Intesa Sanpaolo Assicurazioni Group already provides the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond "No, but we plan to report our portfolio's exposure to fossil fuel in the next two years", in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the "Stop-the-Clock" initiative. Intesa Sanpaolo Assicurazioni Group is committed to fine-tune the portfolio impact analysis, including further developments where material. In addition, Intesa Sanpaolo Assicurazioni Group is

committed to continuously refining its Sustainability and Investment Policies, consistent with evolving national and international regulations and best practices. Furthermore, Intesa Sanpaolo Assicurazioni Group excludes from the investments those issuers deriving more than 15% of their revenues from thermal coal.

Investing in met coal (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :The Insurance Division already provides the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Intesa Sanpaolo Assicurazioni Group already provides the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative. Intesa Sanpaolo Assicurazioni Group is committed to fine-tune the portfolio impact analysis, including further developments where material. In addition, Intesa Sanpaolo Assicurazioni Group is committed to continuously refining its Sustainability and Investment Policies, consistent with evolving national and international regulations and best practices.

Investing in oil (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :The Insurance Division already provides the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Intesa Sanpaolo Assicurazioni Group already provides the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative. Intesa Sanpaolo Assicurazioni Group is committed to fine-tune the portfolio impact analysis, including further developments where material. In addition, Intesa Sanpaolo Assicurazioni Group is committed to continuously refining its Sustainability and Investment Policies, consistent with evolving national and international regulations and best practices. Furthermore, Intesa Sanpaolo Assicurazioni Group excludes from the investments those issuers deriving more than 10% of their revenues from unconventional oil.

Investing in gas (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :The Insurance Division already provides the total amount of "all fossil fuel assets" as reported in PAI 4. As concerns the breakdown the current classification is structured in a way that does not yet exactly reflect the requirement of this question.

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Intesa Sanpaolo Assicurazioni Group already provides the total amount of "all fossil fuel assets" as reported in PAI 4 requirements. As concerns the breakdown, the current classification is structured in a way that does not yet exactly reflect the requirement of this question. We respond “No, but we plan to report our portfolio's exposure to fossil fuel in the next two years”, in light of the ongoing SFDR 2.0 review and the persistent challenges related to ESG data availability, consistency and comparability, further amplified by the postponement of certain CSRD reporting requirements under the “Stop-the-Clock” initiative. Intesa Sanpaolo AssicurazioniGroup is committed to fine-tune the portfolio impact analysis, including further developments where material. In addition, Intesa Sanpaolo Assicurazioni

Group is committed to continuously refining its Sustainability and Investment Policies, consistent with evolving national and international regulations and best practices. Furthermore, Intesa Sanpaolo Assicurazioni Group excludes from the investments those issuers deriving more than 10% of their revenues from unconventional gas.

Insuring all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Not Applicable, ISP Insurance Group has business predominantly aimed at Retail SMEs

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Not Applicable, ISP Assicurazioni Group has business predominantly aimed at Retail SMEs.

Insuring thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Not Applicable, ISP Insurance Group has business predominantly aimed at Retail SMEs

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Not Applicable, ISP Assicurazioni Group has business predominantly aimed at Retail SMEs.

Insuring met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Not Applicable, ISP Insurance Group has business predominantly aimed at Retail SMEs

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Not Applicable, ISP Assicurazioni Group has business predominantly aimed at Retail SMEs.

Insuring oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Not Applicable, ISP Insurance Group has business predominantly aimed at Retail SMEs

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Not Applicable, ISP Assicurazioni Group has business predominantly aimed at Retail SMEs.

Insuring gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

☑ Other, please specify :Not Applicable, ISP Insurance Group has business predominantly aimed at Retail SMEs

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Not Applicable, ISP Assicurazioni Group has business predominantly aimed at Retail SMEs.

(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.

Lending to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Lending to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Lending to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Lending to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Lending to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Lending to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Lending to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset manager) to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Investing (asset owner) to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

Insuring companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

☑ Unknown

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

Banking (Bank)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

☑ Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

☑ EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

430658000000.00

(12.5.4) Total assets covered in the calculation of the taxonomy KPIs in the reporting year

286452000000

(12.5.5) Total assets excluded from the calculation of your alignment KPIs in the reporting year

499403000000

(12.5.6) Aligned assets based on turnover of investees in the reporting year (unit currency as selected in 1.2)

26315000000

(12.5.7) Share of aligned assets based on turnover of investees out of total assets in the reporting year

9.2

(12.5.8) Eligible assets based on turnover of investees in the reporting year

167758000000

(12.5.9) Share of eligible assets based on turnover of investees in the reporting year out of total assets in the reporting year

58.6

(12.5.10) Aligned assets based on CAPEX of investees in the reporting year (unit currency as selected in 1.2)

30805000000

(12.5.11) Share of aligned assets based on CAPEX of investees out of total asset in the reporting year

10.8

(12.5.12) Eligible assets based on CAPEX of investees in the reporting year

176226000000

(12.5.13) Share of eligible assets based on CAPEX of investees out of total asset in the reporting year

61.5

(12.5.14) Share of aligned assets contributing to climate change mitigation based on turnover of investees in the reporting year

9.1

(12.5.15) Share of aligned assets contributing to climate change mitigation that is transitional based on turnover of investees in the reporting year

0

(12.5.16) Share of aligned assets contributing to climate change mitigation that is enabling based on turnover of investees in the reporting year

0

(12.5.17) Share of aligned assets contributing to climate change adaptation based on turnover of investees in the reporting year

0

(12.5.18) Share of aligned assets contributing to climate change adaptation that is adapted based on turnover of investees in the reporting year

0

(12.5.19) Share of aligned assets contributing to climate change adaptation that is enabling based on turnover of investees in the reporting year

0

(12.5.20) Share of aligned assets contributing to climate change mitigation based on CAPEX of investees in the reporting year

10.4

(12.5.21) Share of aligned assets contributing to climate change mitigation that is transitional based on CAPEX of investees in the reporting year

0

(12.5.22) Share of aligned assets contributing to climate change mitigation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.23) Share of aligned assets contributing to climate change adaptation based on CAPEX of investees in the reporting year

0.2

(12.5.24) Share of aligned assets contributing to climate change adaptation that is adapted based on CAPEX of investees in the reporting year

0

(12.5.25) Share of aligned assets contributing to climate change adaptation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.32) “Do No Significant Harm” requirements met

☑ Yes

(12.5.33) Details of “Do No Significant Harm” analysis

Loans to households collateralised by residential immovable property have been assessed as being Taxonomy-aligned for the environmental objective of climate change mitigation and adaptation on the basis of compliance with the technical screening requirements for buildings contained in Delegated Regulation (EU) 2021/2139 and relative DNSH for physical climate risk. For the assessment of the "Do No Significant Harm" requirements to any of the other environmental objectives with respect to economic activity 7.7 "acquisition and ownership of buildings", the regulations require to satisfy the technical screening criteria only in relation to the climate change adaptation objective. Specifically, the EU Taxonomy requires to: 1. Identify the main physical climate risks that affect the activity in question, based on the classification of climate-related hazards set out in Appendix A of (EU) Delegated Regulation 2021/2139 and 2023/2486; 2. Assess adaptation solutions aimed at reducing the identified physical climate risks. For the purposes of identifying the physical climate risks affecting a specific property, ISP has established to use a physical risk scoring model developed internally. In particular, this model assesses, for each property, the materiality of each physical risk deemed relevant in the residential context and considers as material any physical climatic risks assessed with a "high" or "very high" outcome. With regards to the assessment of possible adaptation solutions with respect to physical climate risks considered material, ISP has established that insurance coverage of such risks in itself represents an adaptation solution. Therefore, for GAR purposes, in the presence of insurance coverage for fire risk, the property, if exposed solely to this physical risk, is able to pass the DNSH test.

(12.5.34) Details of calculation

Reporting of EU Taxonomy data is consistent with the official information disclosed in the 2025 Intesa Sanpaolo Group Annual Report, in accordance with applicable regulations and the latest delegated acts issued by the European Union. These include Delegated Regulation (EU) 2026/73, adopted as part of the Omnibus simplification package, which amends Delegated Regulation (EU) 2021/2178 on the content and presentation of Taxonomy-related disclosures.

Investing (Asset manager)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

☑ No, and we do not plan to report in the next two years

(12.5.35) Primary reason for not providing values of the financing and/or insurance

☑ Other, please specify :Regulatory update: adoption of the new Delegated Act 2026/73 introduced as part of the Omnibus package to ISP's EU Taxonomy disclosure FY 2025

(12.5.36) Explain why you are not providing values of the financing and/or insurance

In line with regulatory updates, Intesa Sanpaolo published its FY2025 EU Taxonomy disclosure in accordance with the new Delegated Regulation (EU) 2026/73, introduced as part of the Omnibus package. The regulation simplifies Taxonomy disclosure requirements, and no longer requires Intesa Sanpaolo Group to publish the Annex IV – Template "TEMPLATE FOR THE KPI OF ASSET MANAGERS"

Investing (Asset owner)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

☑ Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

☑ EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

181108000000.00

(12.5.4) Total assets covered in the calculation of the taxonomy KPIs in the reporting year

37022101167

(12.5.5) Total assets excluded from the calculation of your alignment KPIs in the reporting year

150610392265

(12.5.6) Aligned assets based on turnover of investees in the reporting year (unit currency as selected in 1.2)

2940035988

(12.5.7) Share of aligned assets based on turnover of investees out of total assets in the reporting year

7.9

(12.5.8) Eligible assets based on turnover of investees in the reporting year

12275723698

(12.5.9) Share of eligible assets based on turnover of investees in the reporting year out of total assets in the reporting year

33.2

(12.5.10) Aligned assets based on CAPEX of investees in the reporting year (unit currency as selected in 1.2)

4866484411

(12.5.11) Share of aligned assets based on CAPEX of investees out of total asset in the reporting year

13.1

(12.5.12) Eligible assets based on CAPEX of investees in the reporting year

14515124244

(12.5.13) Share of eligible assets based on CAPEX of investees out of total asset in the reporting year

39.2

(12.5.14) Share of aligned assets contributing to climate change mitigation based on turnover of investees in the reporting year

7.5

(12.5.15) Share of aligned assets contributing to climate change mitigation that is transitional based on turnover of investees in the reporting year

0

(12.5.16) Share of aligned assets contributing to climate change mitigation that is enabling based on turnover of investees in the reporting year

0

(12.5.17) Share of aligned assets contributing to climate change adaptation based on turnover of investees in the reporting year

0.1

(12.5.18) Share of aligned assets contributing to climate change adaptation that is adapted based on turnover of investees in the reporting year

0

(12.5.19) Share of aligned assets contributing to climate change adaptation that is enabling based on turnover of investees in the reporting year

0

(12.5.20) Share of aligned assets contributing to climate change mitigation based on CAPEX of investees in the reporting year

11.9

(12.5.21) Share of aligned assets contributing to climate change mitigation that is transitional based on CAPEX of investees in the reporting year

0

(12.5.22) Share of aligned assets contributing to climate change mitigation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.23) Share of aligned assets contributing to climate change adaptation based on CAPEX of investees in the reporting year

0.8

(12.5.24) Share of aligned assets contributing to climate change adaptation that is adapted based on CAPEX of investees in the reporting year

0

(12.5.25) Share of aligned assets contributing to climate change adaptation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.32) “Do No Significant Harm” requirements met

☑ Yes

(12.5.33) Details of “Do No Significant Harm” analysis

The DNSH criteria are verified and implicitly included in the counterparty’s alignment percentages that are collected through an info-provider and used to weight the exposures.

(12.5.34) Details of calculation

Reporting of EU Taxonomy data is consistent with the official information disclosed in the 2025 Intesa Sanpaolo Assicurazioni Annual Report, in accordance with applicable regulations and the latest delegated acts issued by the European Union. These include Delegated Regulation (EU) 2026/73, adopted as part of the Omnibus simplification package, which amends Delegated Regulation (EU) 2021/2178 on the content and presentation of Taxonomy-related disclosures.

Insurance underwriting (Insurance company)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

☑ Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

☑ EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

1753000000.00

(12.5.30) Gross premiums written for taxonomy-aligned non-life insurance and reinsurance activities

2000000

(12.5.31) Total premiums written

1644000000

(12.5.32) “Do No Significant Harm” requirements met

☑ Yes

(12.5.33) Details of “Do No Significant Harm” analysis

In May 2025, Intesa Sanpaolo Protezione launched the "Protezione Catastrofi Natural Business" product, which includes several guarantees that meet all the technical screening criteria, among which: - Modeling and pricing of climate risks that use not only historical losses but also forward looking scenarios, - Incentives for the insured to adopt preventive adaptation measures by reducing the deductible from 15% to 10% in case of verification at the time of the claim of the actual presence of such measures.

(12.5.34) Details of calculation

Reporting of EU Taxonomy data is consistent with the official information disclosed in the 2025 Intesa Sanpaolo Assicurazioni Annual Report, in accordance with applicable regulations and the latest delegated acts issued by the European Union. These include Delegated Regulation (EU) 2026/73, adopted as part of the Omnibus simplification package, which amends Delegated Regulation (EU) 2021/2178 on the content and presentation of Taxonomy-related disclosures.

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	☑ Yes

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

(12.6.1.1) Environmental issue

☑ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

☑ Mitigation
☑ Adaptation

(12.6.1.3) Portfolio

☑ Banking (Bank)

(12.6.1.4) Asset class

☑ Other, please specify :Corporate and SMEs loans, Project finance, Green Mortgages

(12.6.1.5) Type of product classification

☑ Other product classification, please specify :Eligible Loans as defined in the following list of Eligible Categories(Renewable Energy;Energy Efficiency;Clean transportation;Green Buildings;Circular economy;Natural resources and land-use,Biodiversity),aligned to the ICMA Green Bond Principles2021

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

☑ Green Bond Principles (ICMA)

(12.6.1.7) Type of solution financed, invested in or insured

☑ Energy efficiency measures
☑ Green buildings and equipment
☑ Low-emission transport
☑ Renewable energy
☑ Other, please specify :Circular Economy and Environmentally sustainable management of living natural resources and land-use, biodiversity

(12.6.1.8) Description of product/service

Intesa Sanpaolo released the first Green Bond Framework in June 2017; since then, three updated Frameworks were published, the most recent one (June 2022) being the Green, Social and Sustainability (GSS) Bond Framework, released in alignment with the ICMA Green Bond Principles 2021, the ICMA Social Bond Principles 2021, the ICMA Sustainability Bond Guidelines 2021, with the intention of seeking alignment on a best effort basis with the EU Taxonomy regulation on sustainable activities and the Green Bond Standards. The updated Green, Social and Sustainability Bond Framework establishes a list of eligible categories for green, social and Circular Economy funding for which the proceeds of the issues may be used. In March 2026 the new Green and Social Bond Report (on 2025 data) was published. The report is based on the "Portfolio approach" and estimates the impacts and benefits obtained for the entire portfolio of eligible loans for each of the green categories (Renewable energy, Energy Efficiency, Clean transportation, Green Building, Environmentally sustainable management of living natural resources and land-use, biodiversity and Circular Economy). Among others, the report also states the total outstanding eligible loans amounting to €20,754 million (signed

amount, as at 31/12/2025) and the Estimated Impact per €1 million invested (GHG) 229 tCO2e avoided. In addition, please refer to the following metrics report within the 2025 Green and Social Bond Report: -Percentage of Net Proceeds of Green Funding allocated to Eligible Green Loan Portfolio: 100% -Percentage of Eligible Green Loan Portfolio financed (usage): 42% -Balance of net proceeds (Available eligible green loans for new issues): €12,084 million. The data reported in column "% of portfolio aligned with a taxonomy or methodology in relation to total portfolio value" considers the "green bond portfolio" (€20,754million as stated above) out of the total banking portfolio value as reported in question 1.10.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

4.8

(12.6.1.1) Environmental issue

☑ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

☑ Mitigation
☑ Adaptation

(12.6.1.3) Portfolio

☑ Investing (Asset manager)

(12.6.1.4) Asset class

☑ Other, please specify :• Bonds • Equity investments • Fixed income • Money market instruments • Balanced/Flexible funds

(12.6.1.5) Type of product classification

☑ Products that promote environmental and/or social characteristics
☑ Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

☑ Externally classified using other taxonomy or methodology, please specify :Sustainable Finance Disclosure Regulation (SFDR) ART 8 and ART 9

(12.6.1.7) Type of solution financed, invested in or insured

☑ Not applicable

(12.6.1.8) Description of product/service

% of portfolio aligned with a taxonomy or methodology in relation to total portfolio value: data refer to SFDR ART 8 and ART 9 products out of total portfolio value. In addition to exclusions or restrictions strategies adopted to issuers with a clear direct involvement in the extraction or generation of electricity from thermal coal, extraction of oil sands and a “critical” profile as expressed by info-provider’s ‘CCC’ rating, the Asset management division also offers products promoting environmental and/or social characteristics or with sustainable investment as its objective. ART 8 SFDR PRODUCTS. In line with Article 8 of the SFDR Regulation, the asset management division considers products that integrate: (a) the measurement of the carbon footprint of issuers with the aim of constructing portfolios with a lower ecological footprint in relation to their investment universe (so called “Carbon Footprint”); (b) investment selection processes based on sustainable investment criteria under the SFDR Regulation (so called “Sustainable Integration”). In addition, the division provides processes for selecting investments based on positive and negative screening criteria (ethical and thematic funds that invests in specific topics as Circular Economy, megatrends or Net Zero). ART 9 SFDR PRODUCTS. In line with Article 9 of the SFDR Regulation, the asset management division considers products that aim to promote “sustainable investment objectives” (Sustainable Investments) through investment selection methodologies aimed at: selecting investments based on sustainable investment criteria in accordance with the SFDR Regulation (so called “SDG Investing”); generate a positive social or environmental impact together with a measurable financial return (so called “Impact Investing”). In addition, at the end of 2025, Eurizon's investments in Green Bonds (i.e. climate solutions) accounted for 4.02% of the total AUM (At the Baseline Year (2019), 1.53%), with the objective to reach a percentage equal to 4% by 2025, thereby reaching the target set when the NZAMI was joined. Please note that within art.8 and art.9 SFDR products social characteristics/objectives may also be present. Percentage disclosed in the column "% of portfolio aligned with a taxonomy or methodology in relation to total portfolio value" differs from data published in the Annual report as a wider perimeter was considered for the present calculation.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

32.6

(12.6.1.10) Product considers principal adverse impacts on environmental factors

☑ Yes

(12.6.1.11) Details on how the principal adverse impacts on environmental factors are considered in this product

Eurizon and Fideuram have adopted a framework that provides for the use of specific environmental indicators to assess the main negative impacts on sustainability factors identified according to the characteristics and objectives of each financial managed product. In this context, the framework provides for: Exclusions or Restrictions to Issuers with (i) a clear direct involvement in (a) the extraction or generation of electricity from thermal coal and (b) extraction of oil sands and (ii) a "critical" profile as expressed by info-provider's 'CCC' rating. Products that (i) promote sustainable investment objectives (Sustainable Investments) through investment selection methodologies aimed at (a) selecting investments based on sustainable investment criteria in accordance with the SFDR Regulation (so called "SDG Investing"); (b) generate a positive social or environmental impact together with a measurable return (so called "Impact Investing"); (ii) integrate (a) the measurement of the carbon footprint of issuers with the aim of constructing portfolios with a lower ecological footprint than that of their investment universe (so called "Carbon Footprint"), (b) investment selection processes based on sustainable investment criteria under the SFDR Regulation (so called "Sustainable Integration"). Dialogue with participated issuers to encourage companies to assess their (i) energy transition potential and the degree of alignment to the so called "net zero" pathway and (ii) impact on biodiversity and ecosystems, including through value chains. Finally, all the Asset Management products consider PAI indicators in a quali/quantitative manner (depending on the strategy applied and with different degrees of intensity). As for example, a product art.8 applying exclusions and the "score integration" strategy considers the following PAI: (i) GHG intensity of investee companies (tonnes of CO2 per million euro of turnover expressed as a weighted average); (ii) Exposure/share of investments in companies active in the fossil fuel sector (%); (iii) Board gender diversity; (iv) investment in controversial weapons; (v) biodiversity. Data reported within the column "percentage of portfolio value aligned with a taxonomy or methodology to the portfolio value based on assets value" refers to Eurizon and Fideuram art.8 and art.9 SFDR in relation to their total portfolio value.

(12.6.1.1) Environmental issue

☑ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

☑ Mitigation

☑ Adaptation

(12.6.1.3) Portfolio

☑ Investing (Asset owner)

(12.6.1.4) Asset class

☑ Other, please specify :Fixed income, Cash equivalents/money market instruments, Bonds, Equity investments, UCIs.

(12.6.1.5) Type of product classification

☑ Products that promote environmental and/or social characteristics
☑ Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

☑ Externally classified using other taxonomy or methodology, please specify :2088/2019 SFDR art 8 and art 9

(12.6.1.7) Type of solution financed, invested in or insured

☑ Not applicable

(12.6.1.8) Description of product/service

% of portfolio aligned with SFDR ART 8 and ART 9 products methodology in relation to total portfolio value. The effort on developing new art. 8 ex SFDR investment solutions was supported by the evolution of the investment strategies and monitoring processes. In particular, in order to integrate ESG factors into its investment strategies, the Group further strengthened its negative and positive screening criteria with new non-SRI lists, good governance, and DNSH screening. New stricter limits for investments were also defined with reference to thermal coal and Oil&Gas. In addition, the Insurance Group enhanced the Due Diligence approach on third-party Fund Houses selection improving the screening and interview process. Also, the engagement process with high emitters was further consolidated. Furthermore, a new strategy and monitoring process were introduced to take into account Principal Adverse Impacts (PAI) not only at company level, but also for art. 8 and art. 9 investment options. Please note that within art.8 and art.9 SFDR products social characteristics/objectives may also be present. Percentages disclosed in the columns "% of portfolio aligned with a taxonomy or methodology in relation to total portfolio value" and "% of asset value aligned with a taxonomy or methodology" differ from data published in the Annual report as a wider perimeter was considered for the present calculation.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

46

(12.6.1.10) Product considers principal adverse impacts on environmental factors

☑ Yes

(12.6.1.11) Details on how the principal adverse impacts on environmental factors are considered in this product

With regard to the managed products, Intesa Sanpaolo Assicurazioni has adopted a framework that provides for the use of specific environmental indicators to assess the main negative impacts on sustainability factors identified according to the characteristics and objectives of each financial product. In this context, Intesa Sanpaolo Assicurazioni provides for: Exclusions or Restrictions to Issuers, also based on PAI indicators, with (i) a clear direct involvement in (a) from mining or electricity generation activities related to thermal coal and (b) from unconventional oil and gas sources and (ii) a "critical" profile as expressed by info-provider's 'CCC' rating and specifics PAI indicators; method of engagement: engagement activities through the delegated managers on environmental issues (e.g. consumption reduction targets). With regard to PAIs with a quantitative approach, the legislation provides for the selection of some of the PAI indicators set out in Annex I of Delegated Regulation (EU) 2021/1288. The calculation, monitoring and evaluation of the performance of product-level IBPs (Insurance-Based Investment Products) differs according to whether the approach is considered qualitative or quantitative. For PAIs with a qualitative approach, the application of the criteria chosen by the Group is monitored and analysed periodically. In the case of PAIs with a quantitative approach, the calculation, monitoring and analysis of performance follow the logic and timetable illustrated in the section on the consideration of PAIs at Group level. At December 2025 the assets under management relative to art. 8 and art. 9 investment options were €87.7bn (46% of total assets management division assets reported in question 1.10 (year 2025)).

(12.6.1.1) Environmental issue

☑ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

☑ Mitigation

☑ Adaptation

(12.6.1.3) Portfolio

☑ Insurance underwriting (Insurance company)

(12.6.1.5) Type of product classification

☑ Other product classification, please specify :Insurance underwriting products with environmental values

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

☑ The EU Taxonomy for environmentally sustainable economic activities

(12.6.1.7) Type of solution financed, invested in or insured

☑ Climate risk transfer and insurance solutions

(12.6.1.8) Description of product/service

In the non-life business, the Insurance Group operates through the company Intesa Sanpaolo Protezione, offering a wide range of products dedicated to protecting people (illness and accident) with a particular focus on the most fragile categories, homes (theft, fire, etc.), vehicles and the needs of SMEs and the Corporate segment. Among the proposed solutions are those designed to promote sustainable and environmentally friendly mobility, such as specific breakdown services for electric vehicles or policies that reward reduced vehicle use, based on distance driven. In addition, the non-life business products already include cover against catastrophic risks and natural events, aimed at retail customers as well as small and medium-sized enterprises, with a specific focus on climate damage and products dedicated to safeguarding renewable energy plants. Through its product offering, the Insurance Group also supports companies in their digitalisation and ecological transition. From a sustainability reporting perspective, the percentage of the underwriting portfolio aligned with the EU Taxonomy (Underwriting KPI) is 0.13%.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

0.13

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

Forests

(12.7.1) Target set

☑ No, we have not set such targets, but we plan to within the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Targets related to forests have been considered in ISP's Business Plan, which has a specific focus on “natural capital”. With the aim of contributing to natural capital restoration, the 2022-2025 Business Plan includes the commitment to adopting a specific policy on biodiversity. In 2025, the Group adopted the Rules on Biodiversity and Nature and continued to support reforestation initiatives, including the Think Forestry programme launched in 2023 to accompany client companies on the path of environmental transition, with the objective of safeguarding and enhancing natural capital. Through an agreement with the non-profit organisation Rete Clima, the programme supports the reforestation and preservation of natural capital across Italy. Up to 2025, 14 interventions were carried out across various areas in Italy, resulting in the planting of over 19,000 trees. In the new 2026-2029 Business Plan, ISP identifies sustainable lending as one of the strategic levers supporting environmental sustainability and transition. The sustainable lending framework includes, among others, the following categories: “Environmentally sustainable management of natural resources and land use” and “Terrestrial and aquatic biodiversity restoration, conservation and enhancement”. As concerns asset management, starting from August 2023, Eurizon has joined the collective engagement initiative "Nature Action 100", which encourages institutional investors to adopt best practices to combat biodiversity loss and afforestation. In line with this initiative, Eurizon is committed to voting in favour of shareholder proposals that require companies to: commit to mitigating biodiversity loss and protecting ecosystems; assess and report biodiversity impacts, risks and opportunities; define strategic plans to mitigate risks and exploit opportunities related to natural capital, and publish progress against stated objectives; ensure Board oversight of biodiversity conservation and preservation issues; involve stakeholders in the implementation of strategic plans. Eurizon is also committed to engaging with issuers identified as capable of generating negative impacts on biodiversity due to (i) the location of production sites near sensitive areas and fragile ecosystems or (ii) their activities (Eurizon has an internal screening methodology). Starting from September 2023, Fideuram Asset Management Ireland also joined "Nature Action 100".

Water

(12.7.1) Target set

☑ No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Targets related to climate and forests have been taken into consideration in Intesa Sanpaolo's 2022-2025 Business Plan, presented in February 2022 which has a specific focus on “natural capital”. The issue of water-secure lending, investing and insuring was not considered as a top priority at that time, even though risk systems take into account some aspects of water-related issues. As concerns asset management, starting from August 2023, Eurizon has joined the collective engagement initiative known as "Nature Action 100", which encourages institutional investors to adopt best practices to combat biodiversity loss and deforestation. In line with its adherence to the "Nature Action 100" collective engagement initiative, Eurizon is committed to voting in favour of shareholder proposals that require companies: an explicit corporate commitment to mitigating biodiversity loss and protecting ecosystems; the assessment and reporting of biodiversity impacts, risks and opportunities; to define strategic plans to mitigate risks and exploit opportunities related to natural capital, and to publish progress against stated objectives; Board oversight of biodiversity conservation and preservation issues; stakeholder involvement in the implementation of strategic plans. Eurizon is also committed to engage with issuers identified as capable of generating negative impacts on biodiversity caused by (i) the location of production sites near sensitive areas and fragile ecosystems or (ii) by their activities (Eurizon has defined an internal screening methodology). Starting from September 2023, Fideuram Asset Management Ireland also joined "Nature Action 100".

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	☑ Yes

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

(13.1.1.1) Environmental issue for which data has been verified and/or assured

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☑ Progress against targets

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Data related to progress against targets of Scope 3 Category 15 – Banking portfolio are included in the 2025 Intesa Sanpaolo Climate Report that is reviewed by independent auditors (EY) with a limited assurance in accordance with ISAE3000 (revised). The Intesa Sanpaolo 2025 Climate Report is attached in column 5: progress against targets of Scope 3 Category 15 – Banking portfolio is presented on page 123 (details from pages 121 to 137), while pages 186-188 contain the Independent Auditors' report (Independent Auditors' report on the disclosures "Own operations indicators" and "target setting on lending activities: annual reporting of estimated emissions" (together the "Subject Matter") reported in the section "Metrics and Targets" of the Climate Report of the Intesa Sanpaolo Group for the year ended 31 December 2025). The independent auditors concluded that, based on the procedures performed, nothing has come to their attention that would indicate that the Subject Matter for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with the Suitable Criteria.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

2025_Climate_Report.pdf

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

(13.2.1) Additional information

In the attachment you can find Intesa Sanpaolo Climate Disclosure Table document which refers to all documents which have environmental disclosures: https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/sostenibilt%C3%A0/climate-report/2025/Climate_Disclosure_Table_Intesa_Sanpaolo.pdf '[Supplementary information to QUESTION 1.4.1]': Annual revenue: Euro 27.270 billion, figure refers to Operating income. See page 71 of Intesa Sanpaolo Group Annual report 2025 https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/investor-relations/bilanci-relazioni-en/2025/2025_Annual_Report.pdf. '[Supplementary information to QUESTION 1.9]': What was the size of your organization based on total assets value at the end of the reporting period? Figure shown refers to the Group's consolidated total assets Euro 959.887billion (see page 87 of Intesa Sanpaolo Group Annual report 2025) https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/investor-relations/bilanci-relazioni-en/2025/2025_Annual_Report.pdf. '[Supplementary information to QUESTION 1.10]': Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure? -Banking: Portfolio value based on total assets: Euro 430.658 billion Figure shown refers to the

Group's consolidated total loans to customers (see page 92 of Intesa Sanpaolo Group Annual report 2025) https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/investor-relations/bilanci-relazioni-en/2025/2025_Annual_Report.pdf. -Asset management: Portfolio value based on total assets: Euro 562 billion of which: Euro 410 billion Eurizon, page 24 of Eurizon Sustainability Report 2025 https://www.eurizoncapital.com/-/media/Project/Eurizon/EurizonPortals/EurizonPortal/Files/Sustainability/ITA/Report-Sostenibilita-ECSGR.pdf, and Euro 152 billion Fideuram (including assets managed for other financial market participants), page 11 Fideruam Annual report 2025 available in Italian only https://www.fideuramintesasanpaoloprivatebanking.com/media/8257/bilancio-esercizio-fideuram-2025.pdf. -Asset Owner: Portfolio value based on total assets: Euro 181.108 billion, figure refers to Direct deposits (Life) from insurance business, page 100 Intesa Sanpaolo Group Annual report 2025 https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/investor-relations/bilanci-relazioni-en/2025/2025_Annual_Report.pdf. -Insurance underwriting: Euro 1.753 billion figure refers to Direct deposits (Non-life) from insurance business page 100 Intesa Sanpaolo Group Annual report 2025 https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/investor-relations/bilanci-relazioni-en/2025/2025_Annual_Report.pdf. '[Supplementary information to QUESTION 4.7.1]': Some of the policies mentioned were developed in 2025 but because of the approval process, were published in 2026. '[Supplementary information to QUESTION 5.15.1]': The answers refer to the Asset Management Division (Eurizon). Please note that VDS (Voting Dashboard) contains details of votes cast. For further information please refer to the following web page: https://www.eurizoncapital.com/en/sustainability/stewardship-policy/proxy-voting-dashboard-ecsgr. '[Supplementary information to QUESTION 7.53.4]': The target ambition, unless otherwise stated, refers to targets set for the highest-emitting sectors, as indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI and most relevant for the Group. '[Supplementary information to QUESTION 7.53.4]': For SBTi validated targets please refer to https://files.sciencebasedtargets.org/production/files/Target-language-and-summary_Intesa-Sanpaolo-S.p.A.pdf. '[Supplementary information to QUESTION 7.53.4]': As regards Fideuram Asset Management Ireland dac, progress against the target is reported as of 30.06.2025 in order to reflect the product perimeter existing before the rationalisation of the Wealth Management Divisions effective from July 1st, 2025. Moreover, the target relating to Fideuram ISPB Asset Management SGR's has been removed ("Por9" in previous CDP disclosures). Indeed, on July 1st, 2025, the full demerger of Fideuram ISPB Asset Management SGR in favor of Fideuram - Intesa Sanpaolo Private Banking and Eurizon Capital SGR became effective, resulting in the cessation of its business activities. '[Supplementary information to QUESTION 12.1.1]': In the 2025 Annual Report Intesa Sanpaolo published Scope 3 Cat.15, but this data is not comparable with target setting data published in the 2025 Climate Report. '[Supplementary information to QUESTION 12.5]': In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting? Reporting of taxonomy data is consistent with official information provided in the 2025 Intesa Sanpaolo Group Annual Report (Banking (Bank); pages: 224-226, 333-346) and in the 2025 Intesa Sanpaolo Assicurazioni Annual Report (Investing (Asset owner) and Insurance underwriting (Insurance company); pages: 124-131), in accordance with applicable regulations and the latest delegated acts issued by the European Union. These include Delegated Regulation (EU) 2026/73, adopted as part of the Omnibus simplification package, which amends Delegated Regulation (EU) 2021/2178 on the content and presentation of Taxonomy-related disclosures. https://group.intesasanpaolo.com/content/dam/portalgroup/repository-documenti/investor-relations/bilanci-relazioni-en/2025/2025_Annual_Report.pdf. https://www.intesasanpaoloassicurazioni.com/bin/openAssetInline?path=/content/dam/isp_assicurazioni/chi-siamo/documenti-sostenibilita/en/Consolidated_Sustainability_Statement_2025.pdf. Accordingly, data that are no longer required under the updated EU Taxonomy framework have been reported as zero.

(13.2.2) Attachment (optional)

Climate_Disclosure_Table_Intesa_Sanpaolo.pdf

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief Financial Officer, who reports directly to the Managing Director and CEO.

(13.3.2) Corresponding job category

☑ Chief Financial Officer (CFO)