INTESA SANPAOLO

2025 **CLIMATE REPORT**

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The Climate Report discloses climate-related information in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). In October 2023, after fulfilling its mandate, the TCFD disbanded and the Financial Stability Board (FSB) requested the IFRS Foundation to take over the monitoring of progress in corporate climate-related disclosures. The TCFD recommendations have been fully incorporated into the standards of the International Sustainability Standards Board (ISSB) of the IFRS Foundation.

Acknowledgement
The pictures included in this 2025 Climate Report were taken and kindly made available by Intesa Sanpaolo people; they represent a unique contribution to the document.

INTRODUCTION

THE INTESA SANPAOLO GROUP PROFILE

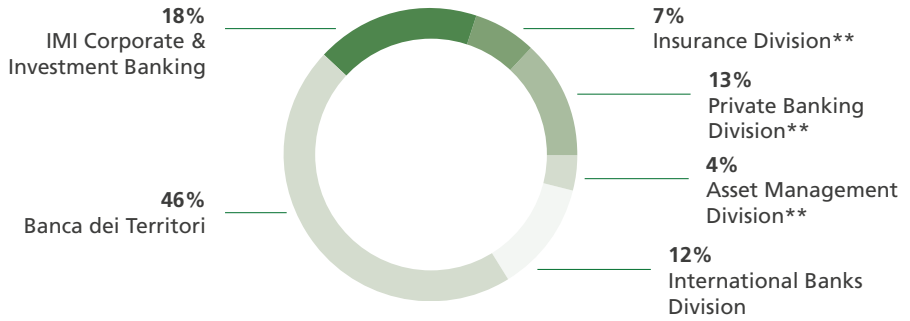
The Intesa Sanpaolo Group is one of the top banking groups in Europe (€101.6bn in market capitalisation[1]) and the leading one in Italy, with a well-diversified and resilient business model, a strong ESG commitment including on climate, a world-class position in Social Impact, and a clear focus on supporting clients in the sustainable transition while promoting decarbonisation, culture and innovation.

The Group serves around 13.9 million customers through a network of over 2,600 branches across Italy and has a strategic international presence, with over 900 branches and approximately 7.4 million customers. As at 31 December 2025, the Group had total assets of €959,887mln, customer loans of €425,033mln, direct deposits from banking business of €600,199mln and direct deposits from insurance business of €182,861mln.

The Group[2] operates through six divisions:

- **Banca dei Territori (BdT):** focus on the market and centrality of the territory for stronger relations with individuals, small and medium-sized enterprises and non-profit entities. The division includes activities in industrial credit, leasing and factoring, as well as the digital bank Isybank (which also operates in instant banking through Mooney, the partnership with the ENEL Group). Loans to customers over €220bn as at 31.12.2025.
- **IMI Corporate & Investment Banking (IMI CIB):** a global partner which, taking a medium-long term view, supports corporates, financial institutions and public administration, both nationally and internationally. Its main activities include capital markets & investment banking. The division is present in 23 countries where it facilitates the cross-border activities of its customers through a specialist network made up of branches, representative offices, and subsidiary banks focused on corporate banking. Loans to customers €124.1bn as at 31.12.2025.
- **International Banks Division (IBD):** includes the following commercial banking subsidiaries: Intesa Sanpaolo Bank Albania in Albania, Intesa Sanpaolo Banka Bosna i Hercegovina in Bosnia and Herzegovina, Privredna Banka Zagreb in Croatia, Bank of Alexandria in Egypt, Eximbank in Moldova, CIB Bank in Hungary, Intesa Sanpaolo Bank Romania in Romania, Banca Intesa Beograd in Serbia, VUB Banka in Slovakia and with one branch in Prague, Intesa Sanpaolo Bank in Slovenia and Pravex Bank in Ukraine. Loans to customers €48.9bn as at 31.12.2025.
- **Private Banking Division:** serves the customer segment consisting of Private clients and High Net Worth Individuals with the offering of products and services tailored to this segment. The division includes Fideuram - Intesa Sanpaolo Private Banking S.p.A. (hereinafter also Fideuram - Intesa Sanpaolo Private Banking), with 7,000 private bankers.
- **Asset Management Division:** asset management solutions targeted at the Group's customers, commercial networks outside the Group and the institutional clientele. The division includes Eurizon, with €353bn of assets under management.
- **Insurance Division:** insurance and pension products tailored for the Group's clients. The division holds direct deposits of €183bn and includes Intesa Sanpaolo Assicurazioni — which controls Intesa Sanpaolo Protezione, Intesa Sanpaolo Insurance Agency and InSalute Servizi — and Fideuram Vita.

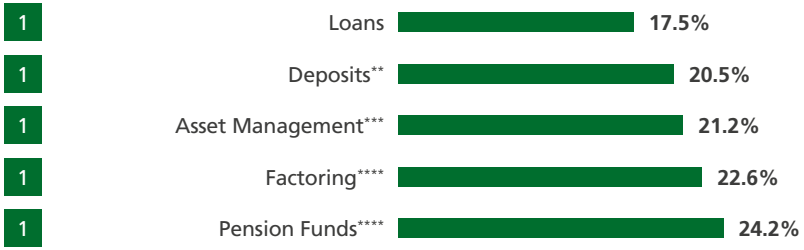
Breakdown of operating income by business area*



Note: figures may not add up exactly due to rounding
* Excluding Corporate centre
** Included in the oversight unit Wealth Management Divisions

1 As at 27 February 2026.
2 Intesa Sanpaolo Profile.

Leadership in Italy



* Data as at 31 December 2025
** Including bonds
*** Mutual funds: data as at 30 September 2025
**** Data as at 30 September 2025

INTRODUCTION

The years leading up to 2025 have been characterised by a persistent and accelerating climate crisis. Scientific evidence confirms that global temperatures have remained at historically elevated levels, with global warming persisting close to the 1.5°C threshold compared to pre-industrial levels. This trend reflects the cumulative effect of greenhouse gas emissions and the ongoing accumulation of heat within the climate system, particularly in the oceans, and confirms that the remaining carbon budget compatible with the objectives of the Paris Agreement is rapidly shrinking.

Against this scientific backdrop, 2025 marked a shift in international climate governance from ambition-setting to large-scale implementation. The 30th United Nations Climate Change Conference (COP30), held in Belém on the tenth anniversary of the Paris Agreement, recognised climate finance as a central enabling condition for effective climate action. Through the Global Mutirão Decision, Parties committed to mobilising at least $1.3 trillion per year by 2035 from public and private sources to support mitigation and adaptation efforts in developing countries. COP30 also launched dedicated implementation mechanisms to accelerate progress towards the 1.5°C objective, while reaffirming the need to significantly scale up adaptation finance over the coming decade.

At European level, climate policy further evolved in 2025 within a complex macroeconomic and geopolitical context. The European Union confirmed a legally binding intermediate target to reduce net greenhouse gas emissions by 90% by 2040 compared to 1990 levels, strengthening the long-term pathway towards climate neutrality. Progress in the energy transition continued in 2025, with renewable sources accounting for around one quarter of gross final energy consumption and nearly half of electricity generation, while overall greenhouse gas emissions showed a continued declining trend. At the same time, achieving the objectives of the European Green Deal is estimated to require average annual investments of approximately €520bn up to 2030, plus around €92bn per year for Net Zero technologies, highlighting the scale and urgency of the investment challenge facing Europe.

In Italy, the regulatory framework supporting the energy transition was further strengthened in 2025. Updates to the Renewable Energy Communities (RECs) framework expanded eligibility to municipalities with up to 50,000 inhabitants and introduced the possibility of advance grants of up to 30% under the National Recovery and Resilience Plan (NRRP). These measures aim to support the deployment of up to 5 GW of incentivised renewable capacity by 2027, reinforcing decentralised energy systems, energy resilience and local contributions to emissions reductions.

Against this backdrop, investment needs and market dynamics confirm the structural relevance of sustainability for the financial system. In 2025, market evidence continued to show that 86% of institutional investors plan to increase their allocations to sustainable investments by 2027, with a growing focus on renewable energy, energy efficiency and climate adaptation. The scale, predictability and alignment of financial flows have therefore become decisive factors for effective climate action, amplifying the role of the financial sector in translating climate commitments into implementation while managing physical and transition risks.

Within this context, Intesa Sanpaolo continued in 2025 to implement its climate strategy, with a focus on monitoring progress against its sectoral decarbonisation targets, further integrating climate considerations into governance and risk management processes, while supporting client transition through dedicated financing and advisory solutions. On 27 January 2025, the Group received the validation by Science Based Targets initiative (SBTi) of targets for the reduction of own emissions (Scope 1 + Scope 2) and of the Group's financed emissions[3]. Also, Intesa Sanpaolo was included in the 2025 Carbon Disclosure Project (CDP) Climate 'A List', which recognises companies for their transparency and effectiveness in tackling climate change.

In a changing external environment, the Group's commitment to decarbonisation continues under the new 2026–2029 Business Plan, which confirms the 2030 targets for financed emissions, asset management, insurance and own emissions and sets the goal of disbursing 30% of total medium to long-term (MLT) new lending[4] over the Business Plan horizon, with a strong focus on social and environmental activities.

With this Climate Report[5], published alongside the Consolidated Sustainability Statement prepared in accordance with the CSRD and the SDGs Report, both approved by the Board of Directors, and also the Responsible Banking Progress Statement, Intesa Sanpaolo confirms the continuity and evolution of its climate strategy and its commitment to supporting the transition towards a sustainable, resilient and low-carbon economy, contributing to the construction of a future that supports environmental protection and future generations.

3 Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets.
4 Equal to ~€112bn assuming ~€374bn total MLT new lending, of which ~€87bn environmental, governance and other sustainable activities.
5 In 2021 and 2022 the Report was denominated 'TCFD Report'. The name was changed to Climate Report after the Task Force was dismantled in October 2023. The Climate Report is based on the Recommendations of the Task Force on Climate related Financial Disclosures.

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Automotive

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GOVERNANCE

The Board of Directors (BoD) of Intesa Sanpaolo approves the strategic guidelines and policies on sustainability (Environmental, Social and Governance) and related disclosures, with the support of the Risks and Sustainability Committee, the involvement of the other Board Committees and all the main corporate bodies including dedicated ESG structures and management levels.

MAIN BODIES AND STRUCTURES

The main Bodies and Structures having ESG and, more specifically, climate-related responsibilities within their remit are illustrated below[1].

Board Governance

Board of Directors (19 members)

Risks and Sustainability Committee (5 members) | **Management Control Committee (5 members)** | **Managing Director and CEO**

Managerial Committees

Steering Committee
Chaired by the Managing Director and CEO.
Members: First organisational lines, including the Heads of Governance Areas (e.g., Chief Financial Officer, Chief Sustainability Officer, Chief Risk Officer) and Divisions.
Frequency of ESG/climate-related meetings: at least quarterly, as part of the Business Plan and Sustainability (ESG) Session.
Group Control Coordination and Non-Financial Risks Committee - Operational Risk session
Chaired by the Chief Risk Officer, it is attended by the heads of the Group's corporate control functions, the relevant Governance Areas, as well as the Manager Responsible for preparing the Company's financial reports.

Managerial Body

ESG Control Room
Chaired by the Chief Sustainability Officer (CSO), or, in their absence, by the Heads of ESG Steering.
Members: Chief Financial Officer, Chief Risk Officer, Heads of ESG Steering, Head of ESG Governance (acting as Secretary).
Additional participants may include Heads of Governance Areas, Divisions, or other structures, depending on the topics addressed.

Main Responsibilities for the management of climate-related and environmental issues

Compliance

Chief Sustainability Officer Governance Area	**Chief Financial Officer Governance Area**	**Chief Risk Officer Governance Area**	**Chief Lending Officer Governance Area**	**Chief Equity, Legal, & M&A Officer Governance Area**	**Chief Cost Management Officer Governance Area**	**Chief Institutional Affairs and External Communication Officer Governance Area**
ESG Steering Chief Social Impact Officer • Intesa Sanpaolo Environment and Energy Innovation Center & Investments • Intesa Sanpaolo Innovation Center	Administration, Regulatory Reporting & Tax Affairs Group Treasury & Capital Management Financial Market Coverage	Enterprise Risk Management Market & Financial Risk Management IMI Corporate & Investment Banking Risk Management Banca dei Territori Risk Management	Loan Origination Strategies	Legal Affairs - Group General Counsel	Group Procurement Real Estate Management	Group Supervisory Strategic Steering European Regulatory & Public Affairs

Chief Data, A.I. and Technology Officer

Internal Audit

Business Divisions	**Banca dei Territori**	**IMI Corporate & Investment Banking**	**International Banks**	**Private Banking**	**Asset Management**	**Insurance**
Sustainability Managers	21 Sustainability Managers appointed within each Governance Area or Division: Banca dei Territori; IMI Corporate & Investment Banking; International Banks; Asset Management; Private Banking; Insurance; Chief Financial Officer; Chief Risk Officer; Chief Lending Officer; Chief Cost Management Officer; Chief Data A.I. and Technology Officer; Chief Institutional Affairs & External Communication Officer; Chief Social Impact Officer; Innovation Center & Investments; Chief Equity Legal e M&A Officer; Chief Governance, Operating and Transformation Officer/Corporate Bodies and Corporate Affairs; Chief People & Culture Officer; Chief Transformation & Organisation Officer; Chief Security Officer; Chief Audit Officer; Chief Compliance Officer.					

ESG Coordination Table / Sustainable Investments and Insurance Table / Social Impact Table

1 Detailed information on the corporate governance and remuneration systems is provided in the 'Report on Corporate Governance and Ownership Structures' and in the 'Report on remuneration policy and compensation paid' published on the Bank's website, to which reference should also be made.

Board Governance

BOARD OF DIRECTORS

Supported by the Risks and Sustainability Committee, the BoD:

- examines and approves the Code of Ethics (and its updates), which describes Intesa Sanpaolo's commitment, among others, to social and environmental responsibilities, and the Group's Code of Conduct;
- defines and approves strategies and policies on sustainability (ESG), including the social and cultural responsibility model and the actions to be undertaken to fight climate change, taking into account the objectives of solid and sustainable creation and distribution of value for all stakeholders;
- defines and approves risk objectives ('risk appetite'), which incorporates ESG risks and, in particular, climate and environmental risks;
- 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;
- 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;
- examines and approves the Consolidated Sustainability Statement, ensuring that it is drawn up and published in accordance with the current regulations, after examination by the Management Control Committee, as well as all other reporting of note in this area - including the Climate Report;
- examines and approves the Pillar 3, including the qualitative and quantitative Sections dedicated to ESG matters;
- examines the annual report on sustainability disclosure risk monitoring activities submitted by the Manager Responsible for preparing the Company's financial reports and the periodic reports submitted by the corporate control functions.

With the support of the Nomination Committee, the Board ensures the implementation of induction activities, dedicated to its members. The BoD, supported by the Remuneration Committee, submits the Remuneration Policies to the Shareholders' Meeting for approval, which link the variable portion of the total remuneration of the top and middle management, based on performance scorecards, also to Group ESG KPIs, including climate-specific indicators.

During 2025, 23 meetings of the Board of Directors were held, 15 of which also addressed ESG topics.

Board oversight and knowledge of sustainability and climate issues

The Board of Directors, appointed on 29 April 2025 for the 2025–2027 term, brings a diverse and extensive range of skills and experience to the Group. Regarding sustainability (ESG) knowledge, upon accepting their candidacy, 84% of Board Members declared a very good/distinctive level of competence on sustainability issues and their integration into the Bank's strategies. In 2025, one specific induction session conducted for the Board was dedicated to ESG topics, with a focus on the evolution of ESG framework and strategy in the new geopolitical and regulatory context, and one specific on-boarding session for new Directors was dedicated to ESG and sustainability topics.

RISKS AND SUSTAINABILITY COMMITTEE

The Risks and Sustainability Committee provides cross-sectoral support to the Board in exercising its strategic supervision functions on sustainability, as well as in setting and monitoring climate and environmental risk objectives. This support is also ensured when examining the areas of governance and risk management, business model and strategic guidelines and the most significant transactions for risk management procedures.

In particular, the Committee supports the Board, inter alia, in:

- evaluating and analysing sustainability (ESG) issues associated with the Bank's activities;
- 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 the evaluation of the stress test results;
- approving the strategic guidelines and policies on sustainability, including the corporate social and cultural responsibility model and the fight against climate change to also ensure more efficient risk monitoring in this field and taking into account the objectives of solid and sustainable creation and distribution of value for all stakeholders;
- assessing and determining matters relating to the materiality analysis, both in terms of impact and financial materiality, also with the purpose

Board Governance

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;

- 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 and in reviewing and assessing the risks indicated;
- approving the list of ESG and/or reputational sensitive areas relevant to the financing activities;
- evaluating the Group's positioning with respect to national and international best practices in the field of sustainability, with a specific focus on Intesa Sanpaolo's participation in major sustainability indices;
- 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;
- approving the Code of Ethics, the Code of Conduct, 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.

The Committee also examines the Report on the Code of Ethics and on the principles of social and environmental responsibility.

During 2025, the Risks and Sustainability Committee convened 44 times, 15 of which were dedicated also to ESG-related matters.

MANAGEMENT CONTROL COMMITTEE

In liaison with the corporate structures responsible for the sustainability issues and the Internal Auditing function, it supervises the compliance with the principles and values contained in the Code of Ethics. With reference to the Consolidated Sustainability Statement, it oversees compliance with the provisions laid down in Italian Legislative Decree No.125/2024 and reports on that in its annual report to the Shareholders' Meeting. In the exercise of its supervisory functions, it examines the Consolidated Sustainability Statement prior to its submission to the Board of Directors. Additionally, it examines the annual information presented by the Manager Responsible for certifying the Consolidated Sustainability Statement regarding the oversight activities related to sustainability reporting risks and the periodic reports submitted by corporate control structures.

MANAGING DIRECTOR AND CEO

The Managing Director and Chief Executive Officer (CEO) plays a key role in governing sustainability performance and holds the authority to submit proposals to the Board for the adoption of resolutions within its remit. The CEO submits proposals for the definition of strategic guidelines and sustainability (ESG) policies including the fight against climate change to the Board of Directors. The CEO ensures the implementation of the resolutions of the BoD, with particular reference to the implementation of the strategic guidelines, Risk Appetite Framework (RAF) — which includes a climate change section — and the risk governance policies defined by the Board of Directors. The CEO is informed annually by the Manager Responsible for certifying the Consolidated Sustainability Statement about the activities of risks oversight related to sustainability reporting.

Managerial Committees

STEERING COMMITTEE

In support of the Managing Director and CEO, the Committee is a managerial body with decision-making, informational and advisory functions. It is composed of the Managing Director and CEO, who chairs it, and the top management, including the Heads of the Governance Areas and the Divisions.

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, taking into account the objectives of solid and sustainable creation and distribution of value for all stakeholders;
- 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;
- 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;
- collaborating 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.

The functions of the Steering Committee are carried out in plenary sessions and special and distinct sessions.

As concerns ESG issues, the Steering Committee meets at least quarterly in a Business Plan and Sustainability (ESG) Session, a specific session also dedicated to ESG and climate-related issues and their inclusion in the Group's development plans, with 17 meetings held in 2025, 8 of which included climate and nature-related topics. Within the Business Plan and Sustainability (ESG) Session, the Steering Committee also monitors the implementation of the planned initiatives and their economic and financial performance (including ESG metrics).

During 2025, ESG/climate-related topics were also examined by the Steering Committee in other sessions than Business Plan and Sustainability (ESG) Session, as follows:

- 1 meeting (out of 9) of the Supervisory Remediation Plans Session;
- 1 meeting (out of 11) of the Group Risk Analysis Session.

Within the latter, the Steering Committee focuses on examining:

- the Group's Risk Appetite Framework proposal, submitted by the Chief Risk Officer Governance Area, to share contents and assess the overall consistency, as a preparatory and functional step to the approval by the Board of Directors;
- the identification and classification of any new risks, within the relevant area of responsibility, presented by the Chief Risk Officer Governance Area for the purpose of updating the Group Risk Inventory in accordance with the relevant Guidelines;
- the 'Tableau de Bord of Risks', by analysing — among others — compliance with the limits on the main specific risks as defined in the RAF and the evolution of the Group's main risks (credit, counterparty, market, operational and other);
- the reporting presented every six months by the Chief Risk Officer Governance Area concerning the entire process of management of the Most Significant Transactions.

GROUP CONTROL COORDINATION AND NON-FINANCIAL RISKS COMMITTEE – OPERATIONAL RISK SESSION

The Group Control Coordination and Non-Financial Risks Committee is tasked with examining, during the Operational Risk session, the main ESG risk profiles that affect or could potentially affect exposure to operational and reputational risks. This session, chaired by the Chief Risk Officer, is attended by the heads of the Group's corporate control functions, the relevant Governance Areas, as well as the Manager Responsible for preparing the Company's financial reports.

Managerial Body

ESG CONTROL ROOM

The ESG Control Room is a collegial managerial body with advisory, analytical, and evaluation functions, which supports the Steering Committee in the exercise of its ESG-related activities, particularly in proposing strategic guidelines, policies and initiatives on ESG issues. The role of ESG Control Room has been strengthened with the establishment of the Chief Sustainability Officer (CSO) Governance Area in 2024, which reports directly to the Managing Director and the Chief Executive Officer (CEO).

The ESG Control Room envisages the permanent participation of the Chief Sustainability Officer, as Chair, the Chief Financial Officer, the Chief Risk Officer, the Heads of ESG Steering and the Head of ESG Governance as Secretary. Depending on the topics addressed, the Chiefs and the Heads of other Governance Areas or Business Divisions and the Sustainability Managers can also participate to the ESG Control Room. The Chair reports, as necessary and at least annually, either directly or through delegates, to the Steering Committee regarding the evaluations and activities carried out by the ESG Control Room.

The main functions assigned to the ESG Control Room are:

- support the Steering Committee in the Business Plan and Budget processes by examining and evaluating proposals related to ESG guidelines and initiatives relevant at Group level, assessing priorities, metrics and targets (KPIs);
- analyse policies, including the Group's social and cultural responsibility model to combat climate change and monitor the implementation of key ESG regulatory governance frameworks;
- provide evaluations on proposals related to the Group's ESG commitments and their main business implications;
- offer evaluations and recommendations on proposals to join major voluntary initiatives and the related action plan necessary to achieve the resulting objectives, monitoring the progress of activities and outcomes;
- analyse and share, in alignment with strategic guidelines and with the support of technical/real estate functions, for the aspects of competence, the Group's Own Emissions plan proposal for presentation to the competent Bodies, and monitor the implementation of the necessary activities to achieve the defined objectives and track the achieved results;
- review the main ESG reports prepared by the competent structures to monitor initiatives and the main ESG targets/objectives (Business Plan and Budget KPIs), assessing the main determinants, and identifying any steering actions with the contribution from the Divisions;
- identify and examine, with the support of the competent business functions, selected relevant elements, before preparing ESG disclosures (e.g., results of the Double Materiality Assessment);
- analyse and provide any feedback on the integration of ESG criteria in equity investments and credit strategies;
- share the findings of ESG regulatory monitoring activities, their related impacts on the Group's operations, and address the compliance activities toward the relevant structures, drawing on the competent functions and their periodic summary reports;
- examine potential impacts of ESG trends in the external context, including those related to other players, market needs and consumer preferences;
- receive updates on relevant ESG-related requests from Regulators or Authorities reported by the reference functions (Divisions and Governance Areas of competence), along with the related responses required for submission to the Bank's Bodies, if applicable.

Additionally, with the aim of activating central coordination for the implementation of sustainability-related activities, the ESG Control Room is supported by the following Tables:

- the ESG Coordination Table, active since 2020, with the primary purpose of sharing, updating and monitoring the ESG-related activities and objectives, with collegial participation from all Governance Areas and Business Divisions through their respective Sustainability Managers;
- the Sustainable Investments and Insurance Table, active since 2022, that ensures overall supervision of the ESG initiatives of the Wealth Management and Insurance Divisions;
- the Social Impact Table, activated in 2025, which focuses on the coordination and strategic direction of social initiatives, as well as on the examination, monitoring, and sharing of relevant projects and related topics with internal stakeholders, some of which may also have environmental impacts.

Managerial Body

In 2025 the following meetings were held:

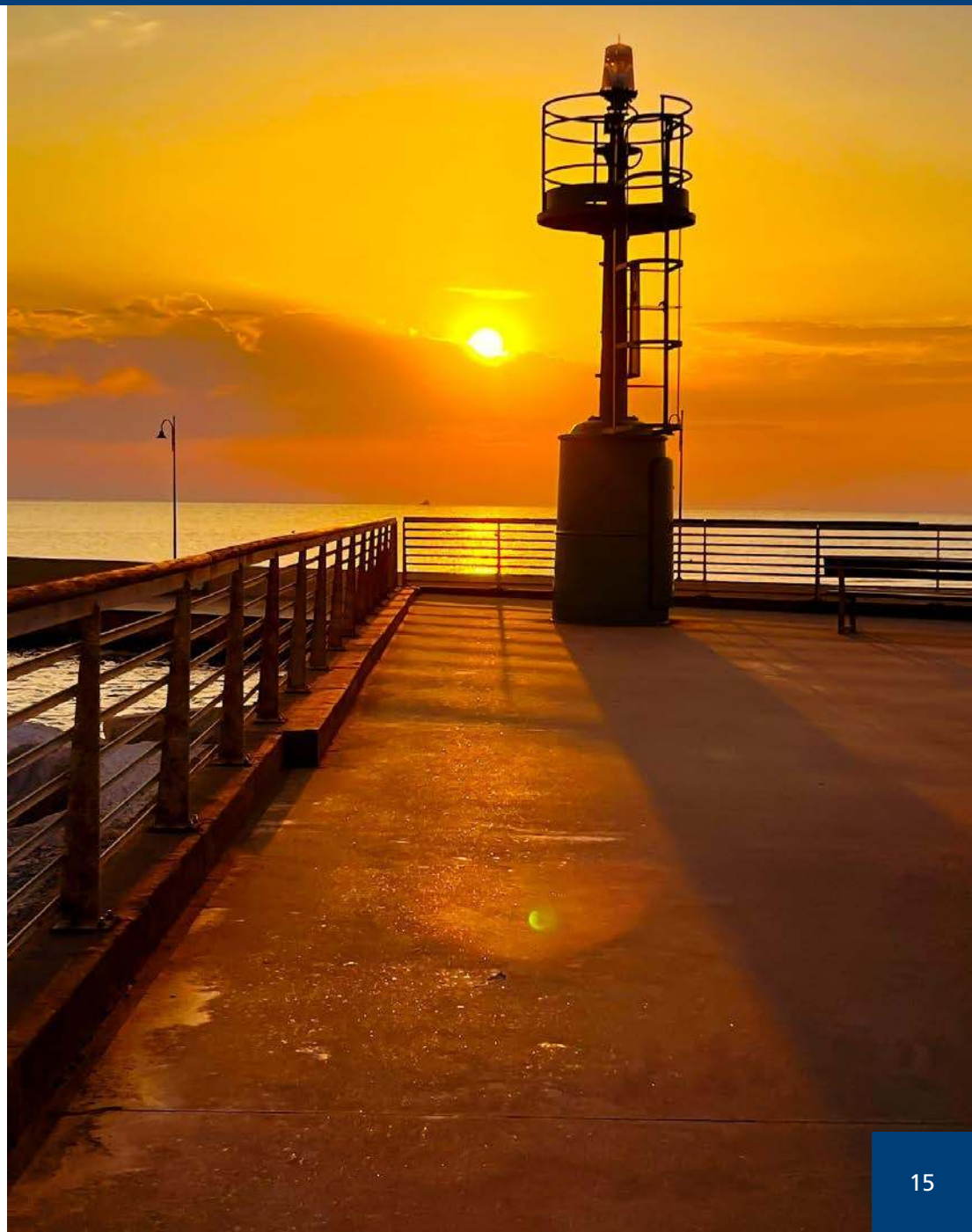
- 7 sessions of the ESG Control Room;
- 8 sessions of the ESG Coordination Table;
- 2 sessions of the Sustainable Investments and Insurance Table;
- 3 sessions of the Social Impact Table.

All the meetings included climate-related issues.

The ESG Tables are chaired by the Head of the CSO Governance Area, with the exception of the Social Impact Table, which is chaired by the Chief of the Social Impact Officer Governance Area.

The Sustainability Managers and representatives of the corporate structures involved in the matters under discussion shall participate in the Tables.

Sustainability Managers are appointed by the Head of each Governance Area/Division and are responsible within their Governance Area/Division for overseeing ESG topics, acting as coordinators on ESG issues and monitoring the implementation of ESG initiatives. They also ensure the dissemination of ESG guidelines, best practices and priorities, and the preparation of the contributions requested for sustainability reporting.



PARENT COMPANY STRUCTURES INVOLVED IN ESG/CLIMATE ISSUES MANAGEMENT

The **Chief Sustainability Officer** (CSO) Governance Area, reporting directly to the CEO, focuses on ESG issues, on guiding the Group's sustainable development and on ensuring the definition and integration, across the organisation, of sustainability into business strategies, including circular economy aspects. It supports the identification of business opportunities linked to customers' transition towards a sustainable economy and the preservation of natural capital, taking into account the relationship with all stakeholders, including customers, shareholders, employees, collaborators, suppliers, the community and the environment, also with regard to responsibility towards future generations.

The Chief Sustainability Officer Governance Area is responsible for:

- overseeing the definition and monitoring of qualitative and quantitative ESG targets, and the identification of actions and initiatives consistent with the Group's strategic objectives, contributing to sustainability reporting;
- 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;
- ensuring the operational functioning of the ESG Control Room and related Tables;
- playing an active role in the development and promotion of the territories and communities and fostering innovation as a key factor for sustainable development and competitive advantage.

Within the Area, **ESG Steering** supports the Head of the Chief Sustainability Officer Governance Area in defining ESG guidelines, policies and strategic initiatives, ensuring their alignment with the Group's overall strategy and objectives[2]. Key responsibilities include:

- defining ESG Key Performance Indicators (KPIs) and their targets, in coordination with the relevant functions, ensuring their monitoring, evaluating results and supporting corrective steering actions and mitigation initiatives;
- supporting Business Units in setting ESG business objectives, promoting the development of ESG business strategies consistent with the Group's sustainability objectives;
- ensuring the planning and coordination of strategic ESG initiatives for its area of responsibility, monitoring their management consistent with the objectives set in the Business Plan;
- ensuring the operational functioning of the ESG Control Room and the related Tables, providing an overview of the ESG initiatives and overseeing the relations with the Sustainability Managers and the other functions involved;
- ensuring the preparation of sustainability reports, publications and information, consistent with internal regulations and within its area of responsibility, also supporting the Manager Responsible for Preparing the Company's Financial Reports and ensuring their overall coherence;
- overseeing the Human Rights Principles and the Code of Ethics and their application, in cooperation with the other competent functions;
- managing ESG-related internal and external communications in cooperation with the other competent functions, supporting the definition of ESG training needs and the dissemination of ESG culture at Group level;
- overseeing the development and management of the Group's ESG Scoring model, which is aimed at assessing and ensuring the ESG positioning of the Group's significant counterparties;
- overseeing and updating within its remit, the 'Rules for the Classification of Sustainable Credit Products and Lending Transactions'[3], ensuring their alignment with the evolution of European regulation, market practices and the Group's internal rules, and participating in the Product Governance processes by assessing the consistency of the sustainability attribute with the Rules;
- overseeing and coordinating the overall framework for the logical flow of the ESG data at Group level, addressing ESG data topics arising from projects initiatives, cooperating with other relevant functions within their area of responsibility, in line with the relevant internal regulations.

Structures of the Business Divisions and Group Companies that carry out ESG-related activities functionally report to ESG Steering for related matters.

2 For further details, refer to the sustainability section in the Group's website (https://group.intesasanpaolo.com/en/sustainability).
3 At the end of 2025, the 'Rules for the Classification of Sustainable Credit Products and Lending Transactions' were updated, and the related responsibility was transferred from the CRO Governance Area to the CSO Governance Area. Reporting in accordance with the new Rules will be available starting from FY 2026.

As other main organisational structures, the CSO Governance Area also includes the Chief Social Impact Officer Governance Area and Innovation Center & Investments.

The **Chief Social Impact Officer** Governance Area leads the Group's social impact initiatives, fostering well-being and inclusion for individuals and communities. Key responsibilities include:

- defining strategic guidelines and intervention models to amplify positive social effects and generate structural changes through the Intesa Sanpaolo for Social Impact;
- ensuring, through **Intesa Sanpaolo Environment and Energy**, the direction, coordination and monitoring of initiatives aimed at mitigating the direct environmental impacts generated by the Group's activities, including the actions, measures and procedures necessary to promote the rational use of energy. Intesa Sanpaolo Environment and Energy is responsible for the Environment and Energy Management System and its related policies. It also contributes to managing risks related to climate change, assessing climate risks for the Bank's assets, ensuring the control of compliance risk, and it acts as a specialist function in relation to environmental regulations.

Innovation Center & Investments, through Intesa Sanpaolo Innovation Center, supports the Head of the Chief Sustainability Officer Governance Area in promoting the innovation of businesses and territories as a key factor for sustainable development and competitive advantage, through the analysis of innovation trends, applied research, support for startups and open innovation, the development of innovation ecosystems, support for the transition to a circular economy, and the dissemination of an innovation culture both within and outside the Group.

In particular, Intesa Sanpaolo Innovation Center: i) represents the Group's center of expertise for the circular economy, developing and providing corporate customers with advisory services aimed at enabling the transition to circular economy principles; ii) provides specialised support to Intesa Sanpaolo's Divisions by issuing technical opinions following the analysis of lending facilities requests under the Circular and Green Economy Dedicated Credit Facility; iii) supports the Group's internal transition to circular economy principles through tailored policies and initiatives; iv) analyses the frontier of scientific research developing reports and publications on a wide range of highly innovative topics, including decarbonisation; v) identifies startups and technologies aimed at addressing climate issues and supports their growth and promotes the development of innovation ecosystem regarding ESG topics.

In the **Chief Financial Officer** (CFO) Governance Area:

- **Administration, Regulatory Reporting & Tax Affairs** is responsible for preparing the Consolidated Sustainability Statement, monitoring and interpreting the development of relevant European and national legislation, defining and subsequently updating the resulting methodological rules, as well as providing regulatory interpretation of the European Taxonomy Rules and calculating the related Green Asset Ratio (GAR);
- **Group Treasury & Capital Management** (GTCM) is responsible for the origination and structuring of the Group's ESG bonds (green/social/sustainability bonds, etc.) 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;
- **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.

The Manager Responsible for preparing the Company's financial reports is charged with the responsibility[4], together with the Managing Director and CEO, of certifying that the Consolidated Sustainability Statement included in the Management Report has been prepared in compliance with the reporting standards applicable under the Corporate Sustainability Reporting Directive (hereinafter 'CSRD'), the Decree, and with the art. 8 of EU Taxonomy Regulation. To this end, they perform the requisite verification and monitoring activities through their subordinate structures.

The **Chief Risk Officer** (CRO) Governance Area ensures the measurement and control of the exposure to ESG risks and, in particular, climate change and environmental risks. The CRO also 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, with particular emphasis on climate and environmental risks.

Within the Chief Risk Officer Governance Area, **Enterprise Risk Management** (ERM) draws up, among others, the proposed Risk Appetite Framework, in which it outlines the level of ESG and reputational risk appetite and the related limits, KRIs and actions monitored and updated on an ongoing basis. It is responsible for the design, development and maintenance of the Group's internal reputational and ESG (including climate change) risk management and assessment system, and it defines the framework

4 Pursuant to Article 154-bis, paragraph 5-ter, of the 'Testo unico delle disposizioni in materia di intermediazione finanziaria' (TUF - Italian Consolidated Law on Financial Intermediation).

for monitoring greenwashing risk. In addition, it draws up and annually updates the Climate/ESG Materiality Assessment within which the Climate/ESG risk levels are assigned to each economic sector/loan portfolio and the sectors most exposed to those risks are identified. Within Enterprise Risk Management, ESG & Reputational Risk is the competence center for reputational and ESG risk management (including climate change), while Risk Clearing oversees the ESG and reputational risk clearing process.

ERM is also in charge of the processes to identify, assess and manage climate-related risks in collaboration with other structures (among others, defining climate sensitive sector policies, running stress test activities, scenario analysis and monitoring of climate risks in ongoing processes). The structure also:

- verifies, in line with the guidelines and provisions of the RAF, the evolution of financed emissions, thereby supporting the relevant structures in the strategic management of the decarbonisation targets, defined 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;
- assesses the ESG (including climate change) and reputational risk profiles of products/transactions/partnerships, with the support of the other control functions and business structures;
- participates in the Product Governance processes by evaluating the reputational risk related to new products and carries out second-level checks on sustainable credit transactions.

Finally, within ERM, a specific structure reports periodically on the Group's overall risk status by producing the 'Tableau de Bord of Risks', which includes a section dedicated to reputational and ESG risks, monitoring compliance with risk appetite limits and reporting their trends to the Top Management and relevant structures.

Market & Financial Risk Management proposes the guidelines and rules for management, measurement and control of valuation, market, counterparty, interest rate, exchange rate, equity investment and liquidity risks at Group level, contributing to the monitoring of ESG risks within its areas of responsibility.

IMI CIB Risk Management and BdT Risk Management define the Credit Risk Appetite (CRA), also with regard to ESG and climate-related risks, and Credit Risk Management, as part of the development and management of internal credit risk measurement models, verifies the significance of the ESG factors, their basis of integration and potential contribution.

The **Chief Lending Officer** (CLO) Governance Area supports the integration of ESG and climate-related risks in the credit granting process. It oversees the overall credit matter, makes credit granting decisions and manages the positions within its remit and, among others, proposes the quantification of the Credit Strategic Adjustment (CSA) ceiling to the CFO, integrating the ESG components and defines the proposal for allocation of the CSA shares, ensuring collaboration and discussion with Business, the Chief Financial Officer Governance Area, the Chief Sustainability Officer Governance Area and the other relevant functions. Within CLO Governance Area, **Loan Origination Strategies** define the proposal and related updates to be submitted to the decision-making bodies, with the support of the relevant structures, to outline credit strategies aimed at guiding origination and managing the stock of credits. This will be achieved through portfolio steering and dynamic management of loans, in line with the objectives of the Business Plan and the Risk Appetite Framework, also taking ESG sustainability aspects into account.

The CLO is also in charge of defining and managing credit rules that incorporate, among others, ESG elements. The CLO Area operates with the contribution of other Governance Areas, among which the Chief Sustainability Officer to verify consistency in relation to the ESG topics.

In addition, the CLO, in accordance with the provisions of the Regulations of the Group Credit Committee, 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 (RWA). 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. In case of a negative opinion on the proposal expressed by the CSO, the final decision on such proposal is escalated to the Board of Directors. The Committee, in a separate Strategic Session, among other activities, develops loan portfolio analysis (including the default rate trend, NPE flows and cost of credit, as well as consistency with the Group NPL Plan and ESG commitments) on a forward-looking and active management basis.

Within the **Chief Audit Officer** Governance Area, the **Global & Strategic Risks Audit Head Office Department** ensures 'cross-risk' supervision on the strategic risks and on the risks related to ESG issues, including climate change. Internal Auditing is also responsible for overseeing the control system on the ESG risks and, for 2025, in continuity with previous years, it has drawn up the 'ESG Risks Audit Programme', as set out in the planning phase. This programme brings together the main ESG-related audit measures and facilitates a uniform approach.

Within its activity plan, drawn up from a risk-based perspective, it also monitors the action plan on climate-related and environmental risk management, which also incorporates the expectations of the European Central Bank.

In accordance with the compliance risk management model set out in the Group Compliance Guidelines[5], the **Chief Compliance Officer** Governance Area ensures monitoring of compliance risks related to ESG issues and that legal and regulatory liability risks are duly taken into account and effectively integrated into the relevant business processes (e.g., investment services).

Through the **Chief Institutional Affairs and External Communication Officer** Governance Area, Intesa Sanpaolo also regularly monitors the regulatory framework relating to climate change at international, European and national level. In particular, at European level, **European Regulatory & Public Affairs** coordinates the activities related to responses to public consultations (including relevant climate-related consultations), drafting of papers or amendment proposals, both directly and through the relevant professional associations.

Within the Chief Institutional Affairs and External Communication Officer Governance Area, the **Group Supervisory Strategic Steering Department** (GSSS) coordinates the relationships with the European Supervisory Authorities (Single Supervisory Mechanism and Single Resolution Mechanism), 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.

The **Chief Cost Management Officer** Governance Area includes:

- the **Group Procurement**, which, among other responsibilities, ensures the regularity of purchasing procedures and oversees the Group Supplier Register by managing the qualification of new suppliers and the ongoing monitoring of qualified suppliers and sub-suppliers. It supervises procurement activities, including the ESG assessment of suppliers, based on the Bank's ESG score and/or the completion of a dedicated questionnaire available on the Supplier Portal;
- the **Real Estate Management**, which is responsible for the centralised monitoring of the Group's buildings' energy consumption, with the aim of identifying any critical issues, directing appropriate corrective actions and reducing associated costs.

The **Legal Affairs - Group General Counsel**, within the **Chief Equity**, **Legal**, **& M&A Officer** Governance Area, provides legal advice and assistance to central structures and Group Companies of Intesa Sanpaolo that have service contracts in place relating to the Bank's and Group's ESG initiatives. Moreover, it monitors the rise of ESG litigations, with a focus on climate/environmental-related issues, at both the Group level and Market level.

The **Banca dei Territori Division** ensures the consistent application of sustainability principles across its operations, with particular focus on promoting energy efficiency, renewable energy and sustainable agricultural practices.

Within the Banca dei Territori Division, Impact Department acts as the interface for sustainability issues between the Division, the Intesa Sanpaolo's Governance functions and the Banks and Companies under its remit. The Department oversees innovative solutions aimed at generating positive social impacts. These initiatives include managing Impact Funds, developing partnerships with public and private entities and creating models to measure the effectiveness of sustainability projects.

In synergy with the Impact Department, the Sales & Marketing Imprese structure contributes to the dissemination of ESG culture among small and medium-sized enterprises (SMEs), promoting the adoption of tools, services and solutions that support sustainable transition and enhance companies' competitiveness. The structure supports the commercial network in identifying ESG-related needs of corporate clients, develops dedicated initiatives and oversees the evolution of the sustainability offering, including through agreements, partnerships and dedicated support programmes.

In the **IMI Corporate & Investment Banking Division**, Strategic Marketing & ESG Initiatives structure acts as a point of synthesis for ESG activities and projects across the Division ensuring the grounding of initiatives and their consistency, also through participation in the ESG Control Room, exercising the role of Sustainability Manager for the Division.

The Structure represents the reference point for the different Governance Areas for ESG initiatives within the IMI Corporate & Investment Banking Division. In this context, Strategic Marketing & ESG Initiatives supports the ESG Advisory structures in activities contributing to the definition of the ESG strategies of the IMI CIB Division with a commercial impact, working in coordination with the competent relationship functions and the other involved structures of the Division. It also contributes to disseminating ESG culture within the Division supporting the offer to IMI CIB customers, through the definition of the communication strategy and the development of commercial initiatives related to various projects. It supports the

5 For the oversight of specific regulatory areas, specialised functions are identified outside the CCO Area (e.g., environmental protection, safety).

competent Division functions in identifying training needs on ESG issues and oversees the commercial monitoring of ESG operations, with a focus on reputational risk control. Furthermore, it develops initiatives aimed at offering innovative ESG products to the Division's customers, including through strategic agreements, joint ventures and extraordinary transactions with third-party counterparties, in collaboration with other structures of the Division and the Group, particularly the Intesa Sanpaolo Innovation Center.

Within the scope of the **International Banks Division** (IBD) the ESG governance model is consistent with the specificities of the national regulations and with the Parent Company's approach.

During 2025, a new target organisational model was defined in the IBD — diversified across both large and small banks — which all banks will gradually adopt, in line with any local regulatory constraints.

The model envisages the establishment of the Chief Governance Officer Area Division, whose Chief also serves as ESG Manager, reporting directly to the Bank's CEO.

The ESG Office will be located in this new Governance Area Division, along with other functions with cross-functional responsibilities, including: General Counsel (Legal and General Secretariat), Data & AI Office, Cybersecurity, Antifraud, BCM & Corporate Security, and Customer Satisfaction and Complaints. Additionally, in each bank of the Division an ESG Committee is in force: the body, chaired by the ESG manager, has advisory and decision-making duties and the objective of coordinating and guiding ESG issues, to ensure the correct implementation of the Parent Company's strategies and guidelines.

The duties and composition of the Committee members are shared across all the banks and reflect the same characteristics of the Committee set up at the Division level (International Banks Division's Environmental, Social and Governance Committee, 'ESG Committee').

This Committee is a consultative and decision-making panel of the International Banks Division, established with the main goal of coordinating and steering its ESG-related matters and ensuring the correct implementation of its ESG strategy, in line with the Parent Company's approach.

Finally, the ESG Business Acceleration structure — operating at Head Office level under the CSO Area and part of the ESG Steering — is led by the Sustainability Manager of the International Banks Division, ensuring the overall implementation of the Division's ESG strategy.

ESG–LINKED REMUNERATION

Incentive Systems Linked to Sustainability Factors

The Intesa Sanpaolo Group is aware of having a significant impact on the social and environmental context in which it carries out its business, choosing to act with the aim of creating long-term value for the Bank, its people, its customers, the community and the environment.

Therefore, the Group includes Environmental, Social and Governance components both in its Annual Incentive System and in its long-term incentive plans.

Annual Incentive System

The 2025 Annual Incentive System for Top and Middle Managers (approximately 3,000 Group managers, both in Italy and abroad), formalised through a Performance Scorecard, includes an Environmental, Social and Governance KPI among the non-financial qualitative objectives, in continuity with previous years.

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:

- **Intesa Sanpaolo's presence in sustainability indexes** of specialised companies (number of appearances);
- **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;
- **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.

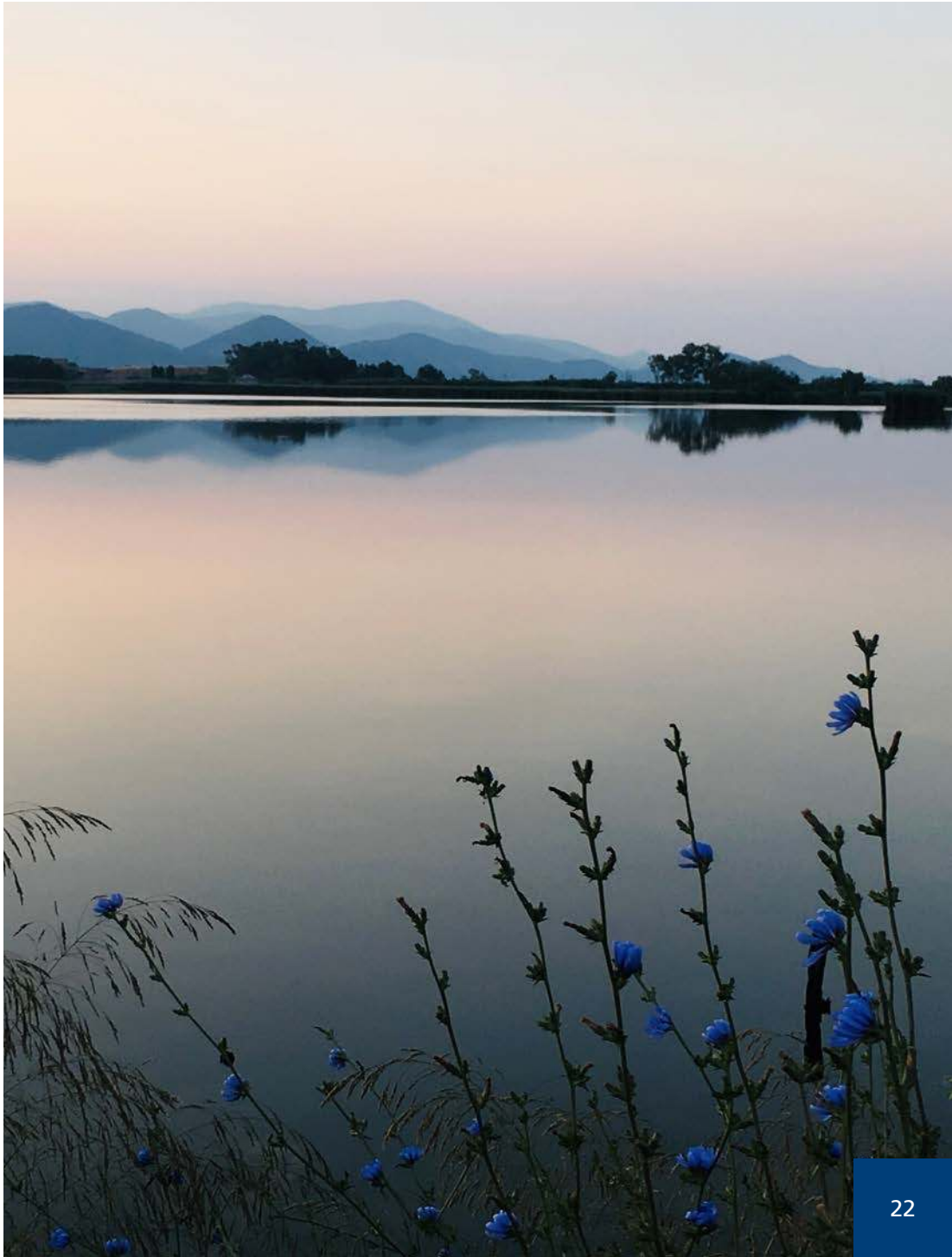
Long-Term Incentive Plan

Management within both Italian and foreign perimeter (~3,100 staff members), including the CEO, is beneficiary of the Performance Share Long-Term Incentive Plan (PSP). The Plan is based on shares that are granted upon achieving specific performance objectives consistent with the Business Plan, whose levels align with those set in the Plan itself.

The PSP includes an ESG composite KPI, consisting of a sub-KPI for each of the three ESG factors (Environmental, Social and Governance), with target levels defined in the 2022-2025 Business Plan. It 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. The environmental sub-KPI (weight 40% of the ESG composite KPI) is based on new lending to the green/circular economy and ecological transition, with a focus on Corporate/SMEs transition.

The same ESG composite KPI is included among the LECOIP 3.0, the long-term incentive plan for all Italian Professionals (45,629 people joined the Plan – about 63% of those eligible), based on Certificates having Intesa Sanpaolo shares as underlying. More in detail, if the Group reaches the target level of the ESG composite KPI, a minimum appreciation of 4% calculated as a fixed percentage of the Initially Allocated Capital is paid.

If the indicator is not achieved, the amount that is not distributed among employees is invested in ESG projects that can contribute to the achievement of failed targets.



STAFF TRAINING TO INCREASE AWARENESS ON ESG AND CLIMATE CHANGE

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. 'Apprendo' is the multimedia platform which also in 2025 was the main tool used for sharing content on ESG/environmental topics with all the Group's people.

Over the course of 2025, a new Group training strategy was defined, leading to the creation of the Corporate Academy, with a primary focus on transformative learning. The Academy, which focuses on topics that are relevant, strategic, and cross-functional for the Group, has been structured for 2025 into eight Faculties that will be launched progressively. One of them will be dedicated to the ESG field: aimed at developing both cross-cutting and specific content on sustainability, focusing on the 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) for a total of 1,038,389 hours.

Within the training offer made available through multimedia platforms, 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[6].

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), but they are also available to all employees with a view to disseminating good practices.

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).

Climate training in Business Divisions

In line with the Group's commitment to fostering sustainability and addressing climate-related challenges, significant efforts have been made across various Business Divisions to enhance awareness and build expertise on ESG and climate issues.

In 2025, within the **Banca dei Territori Division**, personnel were involved in cross-functional ESG and climate training programmes made available at Group level, reaching a total of more than 40,400 participants.

During the same period, further ESG and climate initiatives with a sectoral focus were carried out for the colleagues in the Division. In this context, a workshop programme was structured, with the first session held in 2025 on Packaging ESG trends, best practices and innovations.

The **IMI Corporate & Investment Banking Division** 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. The Division's institutional website has a dedicated Sustainability section, which is updated on an ongoing basis with new contents. Besides, Insights is an editorial space within the site, created with the aim to strengthen the Division's image as a key system player by sharing its perspective on topics of particular interest to the business community and stakeholders and creating opportunities for discussion and in-depth analysis, being the voice of the Division's experts. All content stems from the need to interpret the present, helping navigate the competitive landscape and markets affected by major transformations, such as the sustainable transition, the evolution of the industrial landscape and international and geopolitical dynamics. New videos, podcasts and articles address on a continuous basis also ESG and climate issues. The Division's intranet portal, Atlante, plays a key role in internal communication and dissemination activities, giving significant visibility to ESG-related issues by re-launching Group news, initiatives and documents, as well as publishing content created by members of its Editorial Board. A new training programme on 'ESG Risks' was developed in collaboration with the CRO Area - Risk Clearing, consisting of the module: 'Second-level Clearing on ESG and reputational Risks'. This training reached almost 130 participants in Italy and across the International Network. Additionally, in collaboration with People

6 Data referred to Italian perimeter.

Attraction Skills & Learning Strategy, two ESG SmarTalks were organised for the CIG4GROWTH Tribe[7], involving over 400 people. These webinars covered topics such as 'Energy efficiency as a lever for sustainability' and 'sustainability, renewable energy'. 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 School of Management, around 90 professionals from the Division participated in sessions with a strong focus on ESG topics, particularly climate change and related risks. This knowledge aims to better support customers in their decarbonisation processes and align with the Group's Net Zero portfolio targets. Furthermore, in collaboration with numerous Group Structures, a new Collection of digital Learning Objects on the topic of ESG Covenants has been developed.

The **International Banks Division (IBD)** continued its efforts in 2025 to raise awareness of ESG and climate topics among Corporate and SMEs Relationship Managers. Across the year, two sectoral workshops, addressed to Relationship Managers and ESG specialists, were organised focusing on Textile and Metal sectors: the initiatives were aimed at improving the overall awareness on ESG features. Furthermore, six sessions of the webinar 'Circular economy/Green and S-Loan financing' were also organised in collaboration with Intesa Sanpaolo Innovation Center, with the participation of 9 banks of the Division. These initiatives were designed to build ESG awareness among business functions while supporting the commercialisation of specific green lending solutions, such as the Green Dedicated S-Loan, launched in 2024 in Slovakia (VUB), Hungary (CIB) and Serbia (BIB), extended in 2025 to Croatia (PBZ).

Eurizon Capital SGR, Fideuram - Intesa Sanpaolo Private Banking and the Intesa Sanpaolo Assicurazioni Group (hereinafter also referred to as the 'Insurance Group') organised a seminar focused on biodiversity topics (for employees only, financial advisors are excluded).

Below are the main initiatives undertaken by each company.

The **Eurizon Capital SGR** included ESG-related content as part of its mandatory '30 hours' training programme in 2025. Topics covered included the EU taxonomy, ESG rating and reporting, ESG fund characteristics, SFDR classification, engagement and Sustainable and Responsible Investment practices, characteristics of the legality rating, ESG Score Project Finance, and characteristics of CSRD reporting, involving 164 participants.

Similarly, **Fideuram - Intesa Sanpaolo Private Banking** conducted extensive training and awareness activities on ESG issues for employees and financial advisors.

7 The CIG4Growth Tribe is a professional Community involving employees of the IMI CIB Division, mainly from the Global Corporate and IMI CIB Italian Network business units (approximately 450 members). It provides editorial and informational content on current topics through a dedicated portal, as well as training content on topics of interest specific to each Community.

These initiatives included an ESG attestation training programme, which engaged 5,852 financial advisors from Fideuram, Sanpaolo Invest and IW Private Investments networks, amounting to over 116,000 hours of training by December 2025. Furthermore, 1,054 of these financial advisors took part in the voluntary EEPA training programme and successfully passed the EFPA ESG Advisor certification exam in 2025.

Additionally, mandatory ESG training was provided to approximately 1,800 people, including Private Banking Division employees and financial advisors, accounting for 11,000 training hours over the year. Furthermore, 51 employees completed the 22.5 hours EFPA ESG Advisor certification programme, contributing an additional 1,150 hours of ESG-focused training.

The **Intesa Sanpaolo Assicurazioni Group** is committed to raising a culture of sustainability and promoting awareness of ESG issues among colleagues. During 2025, the entire Division developed a path aimed at further strengthening the attention towards ESG issues through awareness and initiatives to promote sustainability culture. Specifically, the Intesa Sanpaolo Assicurazioni Group carried out:

- 1 deep-dive session on ESG-related topics;
- 1 online awareness meeting on ESG-related topics involving about 481 participants;
- 2 online awareness meetings focused on Diversity and Inclusion (D&I) involving about 686 participants.

Additionally, Intesa Sanpaolo Assicurazioni Group included ESG-related content as part of its mandatory training programme for all its people in 2025. Topics covered included the Environmental protection and the ESG culture.

STRATEGY

THE FRAMEWORK

CODE OF ETHICS - (ABSTRACT)

OUR GUIDING PRINCIPLES AND VALUES

In implementing the corporate mission, the Group's strategy is aimed at creating solid and sustainable value over time, in economic, financial, social and environmental terms, built on relationships of trust with our stakeholders and based on the following values:

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.

PRINCIPLES OF CONDUCT REGARDING THE ENVIRONMENT

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.

Listening and dialogue

The Group recognises that listening to and dialogue with those involved in reducing negative environmental impacts are key to ensuring responsible management of these aspects. To this end, it is committed to:

- ensure and promote ongoing dialogue with all stakeholders representing the 'voice' of the environment, seeking a constructive exchange with them;
- actively participate in international initiatives (including regulators, trade associations, international bodies) to contribute to best practices in environmental responsibility, as well as their dissemination, in line with the spirit of the objectives of the Paris Agreement;
- raise awareness among communities and businesses on good practices to be adopted;
- disseminate environmental values, promoting the involvement of the Group's people, suppliers and customers in the application of responsible environmental practices.

Transparency

The Group promotes clear and transparent conduct that allows all stakeholders to understand its environmental performance. To this end, it is committed to:

- always making information on its environmental strategies and performance accessible to the public through the various communication channels available;
- ensuring the utmost accuracy and transparency in its sustainability reporting.

Equity, diversity and inclusion

The Group considers it essential to make every member of the value chain aware of their responsibility for environmental issues, including climate change, also with a view to protecting those who have no 'voice' and future generations.

Responsible management of direct environmental impacts

The Group's environmental policy is based on the principles of waste reduction, progressive improvement in energy efficiency and performance, consideration of the environmental and social consequences of its choices and the protection of nature and biodiversity. Accordingly, the Group, in addition to pursuing full and substantial compliance with environmental legislative requirements, is committed to:

- pursuing the achievement of net zero emissions by 2050;
- pursuing conscious consumption of resources (e.g., by reducing paper consumption and using recycled paper), including through the implementation of an environmental impact management system and promoting the progressive improvement of energy and water efficiency;
- ensuring the reduction, proper collection and disposal of the waste produced;
- applying the best internationally recognised standards and guidelines for the assessment of environmental impacts.

Responsible management of indirect environmental impacts

The Group also considers the impacts generated by the behaviour of third parties such as customers and suppliers, in the knowledge that it can also contribute to the spread of environmentally virtuous processes and behaviour throughout its value chain. In particular, the Group supports the ecological transition, contributes to the fight against climate change and promotes the protection of nature and biodiversity.

To this end, the Group is committed to:

- pursuing the achievement of net zero emissions by 2050 for the emissions from the loan and investment portfolios;
- considering climate and environmental risk in assessing operations with counterparties (including customers and suppliers) and in the development of policies, products and services, while capitalising on the opportunities offered by the sustainable transition;
- promoting and contributing to the transition towards a circular economic and development model, linking value creation for businesses, local areas and communities to the generation of positive impact, enabling the preservation of natural, economic and social capital;
- promoting services and products to foster the development of a low-emission economy, also through the dissemination of renewable energy and energy efficiency improvement;
- prioritising sourcing from suppliers committed to minimising negative environmental impacts;
- disseminating environmental values, promoting the involvement and appropriate training of the Group's people, suppliers and customers in applying responsible environmental practices.

Overall, regarding the governance of the Code of Ethics, among other matters, ESG Steering submits a Report on the Code of Ethics and on the principles of social and environmental responsibility to the Management Control Committee and the Surveillance Body pursuant to Legislative Decree 231/2001, the Risks and Sustainability Committee and the Board of Directors with the contribution of the Chief Audit Officer structure.

Focus:

Addressing climate change impacts through donations: the Intesa Sanpaolo Charity Fund

Under Article 29.3 of the Articles of Association of Intesa Sanpaolo S.p.A., the Group provides for the allocation, through the 'Fund for charitable, social and cultural contributions', of a share of the distributable profits to support projects concerning solidarity, social welfare and people value.

The Chairman of Intesa Sanpaolo's Board of Directors is in charge of the overall management of the Fund, under the Regulations for the management and use methods, approved by the Bank's Board of Directors in a transparent manner and consistently with the commitments set out in the Intesa Sanpaolo Group's Code of Ethics.

The Intesa Sanpaolo Charity Fund aims to contribute to the achievement of the social objectives of the Group's Business Plan and the Sustainable Development Goals set by the United Nations 2030 Agenda. The intention is to support the most vulnerable people, by financing small and medium-sized projects — traditionally development projects — carried out by non-profit organisations. In relation to climate change mitigation, in case of disasters, calamities, or extraordinary events, to which Intesa Sanpaolo, or the banking system in general, decides to respond, there is the possibility of supporting emergency interventions. In addition, actions in low-income or emerging countries hit by natural disasters (earthquake, flood, drought, etc.) are among the Fund areas of intervention and are included in the Charity Fund's 2025-2026 Guidelines.

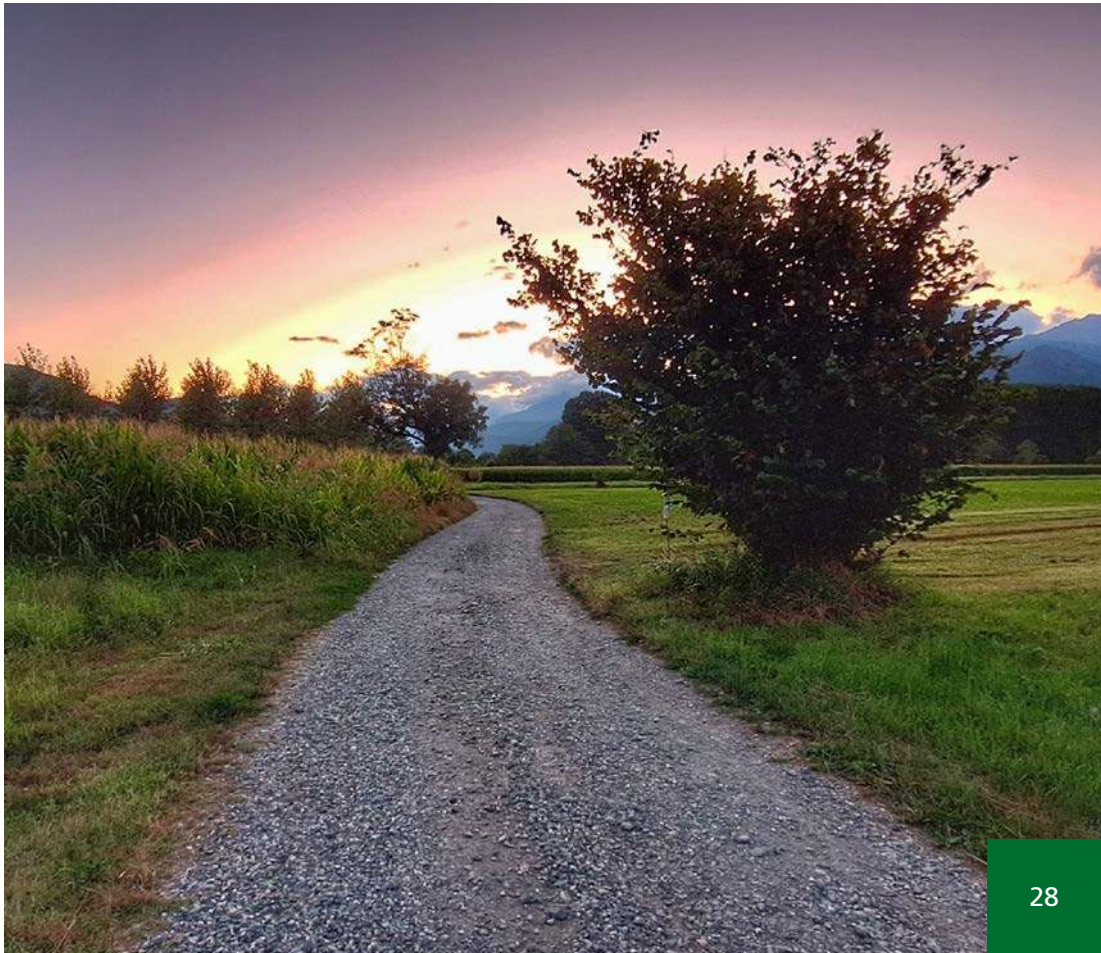
MAIN ESG/CLIMATE RELATED GROUP AND SUBSIDIARIES' POLICIES

Policies are key documents in the path of sustainability that Intesa Sanpaolo has decided to undertake. Starting from the principles expressed in the Code of Ethics, they establish rules to ensure transparency and professionalism in the relationship with stakeholders and identify the responsible functions for the different activities. The main ESG/climate-related policies are listed below:

- Guidelines for the governance of Environmental, Social and Governance (ESG) risks
- Rules for lending operations in the Coal sector
- Rules on Oil & Gas sector
- Rules on Biodiversity and Nature
- Environmental and energy policy
- Rules on Green Banking Procurement
- Health, Safety And Welfare at Work Policy
- Organisational, management and control model
- Policies on the integration of sustainability risks and information on the main negative effects on sustainability factors in the provision of investment advisory services and in insurance distribution - Intesa Sanpaolo

In addition, the main ESG-/climate-related Subsidiaries' Policies include:

- Eurizon Capital SGR S.p.A.
  - Eurizon Sustainability Policy
  - Eurizon Engagement Policy
  - Eurizon Strategy to exercise participation and voting rights inherent to the financial instruments pertaining to the managed assets
- Fideuram - Intesa Sanpaolo Private Banking S.p.A.[1]
  - Policies on the integration of sustainability risks and information on the main negative effects on sustainability factors in the provision of investment advisory services, in insurance distribution, and in portfolio management
- Fideuram Asset Management (Ireland) dac. (hereinafter also Fideuram Asset Management Ireland)
  - Integration of sustainability risks in investment decision-making process and consideration of the principal adverse sustainability impacts under EU Regulation 2019/2088 (SFDR)
  - Sustainable and Responsible Investment Policy
  - Engagement Policy
  - Shareholder Rights, Voting and Engagement Policy
  - Integration of Sustainability Risks into the Remuneration and Incentive Policies
- Intesa Sanpaolo Assicurazioni S.p.A.
  - Sustainability Policy
  - Policy on Principal Adverse Sustainability Impact (PAI) of the Group Intesa Sanpaolo Assicurazioni, pursuant to EU Reg. 2019/ 2088 SFDR - (Sustainable Finance Disclosure Regulation)
  - Policy for the integration of ESG (Environmental, Social and Governance) sustainability factors into the investment process
  - Remuneration and Incentive Policies[2]



1 The Fideuram - Intesa Sanpaolo Private Banking's Policy is available in Italian only.
2 The Remuneration and Incentive Policies are available in Italian only.

ON THE PATH TO NET ZERO

2004

Eurizon becomes Investor Signatory of CDP

2007

Intesa Sanpaolo joins UNEP FI, UN Global Compact

Intesa Sanpaolo implements the Equator Principles

Intesa Sanpaolo enters FTSE4Good, ASPI Eurozone and the Ethibel Investment Register

2011

Intesa Sanpaolo approves the 2009-2013 Sustainable Energy Action Plan. It has the goal to reduce the energy consumed within the Group, through investments aimed to increase energy efficiency. The scope of interest is limited to Italy

Intesa Sanpaolo enters the Dow Jones Sustainability Indices

Creation of IMPRES@MBIENTE portal: the portal is dedicated to Intesa Sanpaolo Group's corporate clients operating in the field of environmental sustainability and renewable energy

2013

Intesa Sanpaolo publishes the 2013-2016 Sustainable Energy Action Plan: the plan sets measurable goals in the areas of energy savings, cost savings and CO_2 emissions reduction
The scope of interest, limited to Italy in the first Plan, has gradually expanded to include several foreign Banks

2015

Intesa Sanpaolo joins the Principles of Responsible Investment (PRI)

Intesa Sanpaolo joins the Ellen MacArthur Foundation Network in 2015

2017

Intesa Sanpaolo publishes the 2018-2021 Business Plan

Intesa Sanpaolo launches its first Green Bond

Intesa Sanpaolo publishes the Climate Change Action Plan. Intesa Sanpaolo Group defines targets for the reduction of CO_2 emissions related to its own activities, with targets to 2022 and 2037

2018

Intesa Sanpaolo supports the TCFD Recommendations

2019

Intesa Sanpaolo creates the ISP4ESG Program

Intesa Sanpaolo joins the UNEP Finance Initiative – Principles for Responsible Banking (PRB)

Intesa Sanpaolo joins the UNEP Finance Initiative – Principles for Sustainable Insurance (PSI)

2020

Intesa Sanpaolo sets up the ESG Control Room

Intesa Sanpaolo launches the first ESG S-Loan

Intesa Sanpaolo publishes its 'Guidelines for the governance of Environmental, Social and Governance risks in lending activities' and a first policy that defines limitations and exclusion criteria in the Coal Sector

2021

Intesa Sanpaolo includes a specific section on Climate change in its Risk Appetite Framework (RAF)

Intesa Sanpaolo publishes an update of the policy limiting the activities in the Coal Sector and a new policy on the unconventional Oil & Gas sector

Intesa Sanpaolo publishes its commitment to Net Zero Emissions by 2050

Intesa Sanpaolo joins the Net-Zero Banking Alliance (NZBA)[3]

Eurizon Capital SGR, Fideuram Asset Management SGR[4] and Fideuram Asset Management Ireland join the Net Zero Asset Managers Initiative (NZAMI)[5]

Intesa Sanpaolo Assicurazioni joins the Net-Zero Asset Owner Alliance (NZAOA) and Net-Zero Insurance Alliance (NZIA)[6]

Intesa Sanpaolo publishes the first Group-wide TCFD Report

2022

Intesa Sanpaolo publishes its 2022-2025 Business Plan, including its first interim financed emissions targets to 2030 under the Net-Zero Banking Alliance (NZBA) and targets to 2030 for its Own Emissions

Intesa Sanpaolo publishes its new Group Guidelines for the governance of ESG risks

Eurizon Capital SGR, Fideuram Asset Management SGR and Fideuram Asset Management Ireland and ISP Assicurazioni publish their first targets under the NZAMI and the NZAOA

Intesa Sanpaolo becomes Investor Signatory of CDP

2023

Intesa Sanpaolo publishes an update of its Code of Ethics including references to Net Zero

Intesa Sanpaolo updates its Group Guidelines for the governance of ESG risks

Launch of the Think Forestry programme

Target setting initiatives continue

Eurizon Capital SGR, Fideuram Asset Management SGR and Fideuram Asset Management Ireland join the Net Zero Engagement Initiative (NZEI), Climate Action 100+, Nature Action 100 and publish their first reports on progress vs target, achievement of targets, as does Intesa Sanpaolo Assicurazioni

2024

Additional intermediate 2030 targets set for Residential Real Estate, Cement, Aluminium, Agriculture – Primary farming and ambition increased for the Commercial Real Estate sector

Intesa Sanpaolo in March 2024 submits the documentation for 'Science Based Target initiative' (SBTi) validation of targets for the reduction of own emissions (Scope 1 + Scope 2) and the Group's financed emissions[7]

New Rules on the Oil & Gas sector

Intesa Sanpaolo Assicurazioni joins the Forum for Insurance Transition to Net Zero (FIT)[8]

2025

On 27 January 2025, the Group receives the validation by SBTi of targets for the reduction of own emissions (Scope 1 + Scope 2) and the Group's financed emissions[7]

Intesa Sanpaolo publishes in January 2025 the Rules on Biodiversity and Nature

Intesa Sanpaolo adheres to the Principles for Sustainable Trade Finance developed by the International Chamber of Commerce (ICC)

early 2026

At the relaunch of NZAMI in Q1 2026, Eurizon Capital SGR and Fideuram Asset Management Ireland confirmed their membership to the initiative

Intesa Sanpaolo publishes in February 2026 its 2026-2029 Business Plan, in which the Group has confirmed the 2030 targets for financed emissions, asset management, insurance and own emissions

3 In October 2025, Net-Zero Banking Alliance 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.
4 Effective July 1st, 2025, the full demerger of Fideuram Asset Management SGR in favor of Fideuram - Intesa Sanpaolo Private Banking and Eurizon Capital SGR becomes effective, resulting in the cessation of its business activities.
5 On 13 January 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context. During this review phase, the initiative suspended activities to track signatory implementation and reporting. On 29 October 2025, the review was completed with the relaunch of the initiative and the adoption of an updated framework that introduces greater flexibility in the definition of targets, while maintaining the commitment to transparency and annual reporting. At the relaunch of NZAMI in Q1 2026, Eurizon Capital SGR and Fideuram Asset Management Ireland confirmed their membership to the initiative.
6 The Net-Zero Insurance Alliance was discontinued as of 25 April 2024.
7 Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets. For further details on temperature rating targets please see the 'Metrics & Targets' chapter.
8 The Forum was announced by the United Nations Environment Programme (UNEP FI) following the announcement of the termination of the Net-Zero Insurance Alliance on April 25, 2024.

GROUP STRATEGY

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. This is reflected in the 2022–2025 Business Plan, under which the Group successfully achieved and exceeded the objectives set out therein. Building on the results achieved to date, Intesa Sanpaolo has defined the strategic guidelines of the new 2026–2029 Business Plan and is committed to continuing, with determination, the growth path undertaken over time, in line with the expectations of all stakeholders, and to delivering its commitments with ambition and responsibility. Over this period, the Group will continue to support clients in their sustainable transition, while reaffirming its commitment to decarbonisation.

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[9], as reinforced in the 2022–2025 Business Plan. The commitment was further strengthened by the publication of its 2030 financed emissions targets for the highest emitting and most relevant sectors for the Group. On 27 January 2025, the Group received the validation by SBTi of targets for the reduction of own emissions (Scope 1 + Scope 2) and the Group's financed emissions[10]. SBTi validation on Intesa Sanpaolo's Scope 1 and Scope 2 target determines that its ambition is in line with a 1.5°C pathway, providing a clear affirmation of the strength of Intesa Sanpaolo's decarbonisation strategy. The Intesa Sanpaolo 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.

Generally, in developing its strategy, the Group is also inspired by the 'Just Transition' principles, according to which the transition to greener, more resilient and climate-neutral economies and societies must take place fairly, in a socially equitable way, leaving no one behind.

The Group has a diversified business model — with revenues from financing, investment, asset management and insurance underwriting activities — and serves the various sectors of the economy both at the national and international level. This diversification increases the breadth of analysis and action 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, Intesa Sanpaolo 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. The Group has also adopted a business model that combines the generation of sustainable revenues, high efficiency and a low-risk profile.

As concerns own operations, the 2022-2025 Business Plan sets a 53% reduction in Scope 1 and Scope 2 absolute emissions by 2030 compared to 2019 levels. The ongoing effort deployed over the years by the Group to reduce its own emissions led to a decrease of 39% of CO_2 (Scope 1+2) from 2019 to 2025. With the current Own Emissions Plan, the Group expects to reach carbon neutrality and 100% of renewable electricity purchased at Group level in 2030, in line with the 2022-2025 Business Plan. In 2025 approximately 95.3% of electricity was acquired from renewable sources.

With reference to financed emissions from lending activities, at the end of 2025 sectors covered by target setting accounted for ~73% of the financed emissions in the highest-emitting sectors identified by the UNEP FI's 'Guidelines for Climate Target Setting for Banks'. Targets are supported by actions identified and summarised in a Sectoral Transition Plan, which integrates and updates the Group's decarbonisation strategy. Yearly progress is detailed in the 'Metrics & Targets' chapter and shows a further reduction of 12% in absolute financed emissions[11] from end 2024 to end 2025.

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[12] and unconventional[13] Oil & Gas resources, accomplished in 2025. As concerns the promotion of

9 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).
10 Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets. For further details on temperature rating targets please see the 'Metrics & Targets' chapter.
11 Emissions refer to those within the Target Setting perimeter, as further specified in the 'Target Setting on Lending Activities: Annual Reporting of estimated emissions' section.
12 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.
13 Unconventional resources defined as: shale/tight oil, shale/tight gas, tar sands/oil sands, coal bed methane/coal seam gas.

sustainable financial products and services to foster the transition to a low carbon economy model, within its 2022-2025 Business Plan Intesa Sanpaolo committed to providing €88bn of which €76bn of new lending in order to support the green economy and 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 2022-2025 Business Plan horizon. In the period 2021-2025[14], new lending in support of the green economy, circular economy and ecological transition[15] amounted to around €89.4bn, exceeding the target set of €76bn. This commitment has been renewed in the Intesa Sanpaolo 2026-2029 Business Plan, with the goal of disbursing 30% of total medium to long-term (MLT) new lending[16] over the 2026-2029 Business Plan time horizon, with a strong focus on social and environmental activities.

Moreover, among the solutions offered to corporate and SMEs, Intesa Sanpaolo in 2025 launched CO_2 Mitigation Solutions, a dedicated decarbonisation service that offers innovative tools to support companies in their efforts to reduce CO_2 emissions. In particular, corporate clients can measure their generated CO_2 emissions, in order to define reduction targets and actions through interventions in business processes and offset residual emissions through certified climate projects.

With reference to asset management and insurance division, the Net Zero commitment was consolidated through the release of intermediate targets.

Recent results as at the end of 2025 show positive trends for all wealth management companies, on the path to the achievement of targets set. For example, Eurizon successfully achieved and exceeded its stewardship target by carrying out engagement activities with companies representing 75.6% of the financed emissions of the portfolio in scope. Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland also conducted dedicated engagement and stewardship activities, achieving by the end of 2025 coverage levels of financed emissions of 71.3% and 72.1% respectively, meeting the 70% Stewardship and Engagement targets previously submitted to NZAMI in 2022.

The 2022-2025 Business Plan also envisaged the growth of assets under management classified under art. 8 and 9 of the SFDR 2019/2088. Specifically, in 2025 funds pursuant to Articles 8 and 9 of SFDR 2019/2088 accounted for 75.4%[17] of Eurizon's total assets under management, while in the Fideuram Division, 79.4% of customer assets[18] are classified as ex art. 8 and 9 including non-Group funds, 87% of which fall under Articles 8 and 9.

The availability and/or provision of eligible financing is also underpinning green and social bond issuances. Total outstanding green and social bonds at the end of 2025 are €11.1bn of which €8.7bn relating to green bonds. As indicated in its 2022-2025 Business Plan, Intesa Sanpaolo is aware of the need to safeguard, protect and promote natural capital and developed the 'Rules on Biodiversity and Nature.' In this context, the Group reaffirmed the Think Forestry programme: launched in November 2023, it is an extensive planting programme with the goal of contributing to the reforestation and preservation of natural capital in different Italian cities and encouraging participation from its corporate clients. Furthermore, Intesa Sanpaolo supported a tree planting initiative in Puglia with Fondazione Sylva in Nardò, in the province of Lecce. As part of Intesa Sanpaolo's commitment to the protection of natural capital, the CO_2 Mitigation Solutions programme, among other initiatives, gives corporate clients access to carbon credits certified by international standards, financing conservation and restoration projects selected by the Bank with a high environmental impact and biodiversity benefits.

Alongside these initiatives, in 2025, Intesa Sanpaolo adhered to the ICC Principles for Sustainable Trade Finance, the first global framework for classifying sustainable trade finance. By actively contributing to the development of these standards, the Bank reinforces its leadership in sustainable finance and its commitment to meeting growing ESG demands.

Intesa Sanpaolo continues to pay particular attention to the regular dissemination of knowledge and training on climate and related new emerging trends as well as, more broadly, on all ESG themes, both within the Group and towards its customers. It also continues to offer its contribution through engagement processes with various stakeholders, both at national and international level.

14 Starting from 30.06.24 the figure also includes the 2022-2025 cumulative amount of transition finance pertaining to the foreign activities of the Group.
15 In the 2021-2026 period, new transition finance including new lending related to National Recovery and Resilience Plan.
16 Equal to ~€112bn assuming ~€374bn total MLT new lending, of which ~€87bn environmental, governance and other sustainable activities.
17 Eurizon perimeter - funds pursuant to Articles 8 and 9 of SFDR 2019/2088 (around €169bn assets). With reference to funds and AM products, the share of total AuM pursuant to Articles 8 and 9 of SFDR 2019/2088 is 76% (around €183bn assets).
18 It considers products distributed by the Fidueram Division to its customers.

COMMITMENTS AND PARTNERSHIPS AS PART OF THE GROUP'S ENVIRONMENTAL STRATEGY

The Group's voluntary commitment to domestic and international initiatives and partnerships shows long term and growing involvement and collaboration with public and private bodies on climate-related matters.

NET ZERO INITIATIVES

Commitments

INVESTOR AGENDA	2024	Global Investor Statement to Governments on the Climate Crisis
UN environment programme – finance initiative	2024	Statement from the Private Financial Sector to the member States negotiating the International Legally Binding Instrument (ILBI) to end Plastic Pollution[19]
FIT	2024	Forum for Insurance Transition to Net Zero (FIT)[20]
Climate Action 100+	2023	Climate Action 100+[21]
Nature Action 100	2023	Nature Action 100[22]
IIGCC The Institutional Investors Group on Climate Change	2023	The Institutional Investors Group on Climate Change: IIGCC (Since 2021)[23] The Net Zero Engagement Initiative (NZEI)
RLCF Alliance	May 2022	Renewable and low-carbon fuels value chain industrial alliance
UN environment programme – finance initiative	December 2021	Net Zero Insurance Alliance (NZIA)[24]
		Net Zero Asset Owner Alliance (NZAOA)
	November 2021	Net Zero Asset Managers Initiative (NZAMI)[25]
	October 2021	Net-Zero Banking Alliance (NZBA)[26]
European Clean Hydrogen Alliance	May 2021	European Clean Hydrogen Alliance
	March 2021	Climate Investment Platform
UNEP FINANCE INITIATIVE – PSI Principles for Sustainable Insurance	December 2019	UNEP Finance Initiative – Principles for Sustainable Insurance – PSI
Signatory of: UNEP FINANCE INITIATIVE – PRINCIPLES FOR RESPONSIBLE BANKING	September 2019	UNEP Finance Initiative – Principles for Responsible Banking - PRB
TCFD TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES	October 2018	Task Force on Climate-related Financial Disclosures – TCFD[27]
Signatory of: PRI Principles for Responsible Investment	2015	Principles for Responsible Investment
EQUATOR PRINCIPLES	2007	Equator Principles
WE SUPPORT UN GLOBAL COMPACT	2007	Global Compact
UN environment programme – finance initiative	2007	UNEP Finance Initiative
CDP	2004	CDP

Partnerships and memberships

	2024	European Energy Efficiency Financing Coalition
TNFD Taskforce on Nature-related Financial Disclosures	2023	Member of the TNFD Forum
Energy Efficient Mortgage Label	February 2021	Energy Efficient Mortgages Label
	December 2019	Energy efficient Mortgages Action Plan
ALLEANZA PER L'ECONOMIA CIRCOLARE	2017	Alliance for Circular Economy
ELLEN MACARTHUR FOUNDATION Strategic Partner	December 2015	Ellen MacArthur Foundation
Forum per la Finanza Sostenibile	2007	Forum for Sustainable Finance

19 In 2024, the Group signed the Finance Statement on Plastic Pollution to support the Global Plastic Treaty.
20 The Forum was announced by the United Nations Environment Programme (UNEP FI) following the announcement of the termination of the Net-Zero Insurance Alliance on April 25, 2024.
21 Intesa Sanpaolo participates through: Eurizon Capital SGR, Fideuram - Intesa Sanpaolo Private Banking, Fideuram Asset Management Ireland and Intesa Sanpaolo Pension Funds.
22 Intesa Sanpaolo participates through: Eurizon Capital SGR, Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland.
23 Intesa Sanpaolo participates through: Eurizon Capital SGR, Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland.
24 The Net-Zero Insurance Alliance was discontinued as of 25 April 2024.
25 On 13 January 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context. During this review phase, the initiative suspended activities to track signatory implementation and reporting. On 29 October 2025, the review was completed with the relaunch of the initiative and the adoption of an updated framework that introduces greater flexibility in the definition of targets, while maintaining the commitment to transparency and annual reporting. At the relaunch of NZAMI in Q1 2026, Eurizon Capital SGR and Fideuram Asset Management Ireland confirmed their membership to the initiative.
26 The Intesa Sanpaolo Group, having joined NZBA, NZAOA and NZAMI, commits to setting science based targets (SBTi) to achieve Net Zero emissions by 2050 (or sooner) and to developing transition plans to support the decarbonisation of the global economy. In October 2025, Net-Zero Banking Alliance 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.
27 In 2023 the TCFD has fulfilled its remit and disbanded. The FSB's request to transfer the TCFD's monitoring responsibilities to the ISSB (International Sustainability Standards Board) from 2024.

Focus:

Other endorsements - ICC Principles for Sustainable Trade Finance

In 2025, Intesa Sanpaolo adhered to the Principles for Sustainable Trade Finance developed by the International Chamber of Commerce (ICC) together with a global group of banks, corporates and institutions. This represents the first worldwide operational framework for the classification of sustainable trade finance, whose criteria were defined and shared through working tables in which Intesa Sanpaolo actively participated. The primary objective of the ICC Principles is to direct global trade capital toward activities that demonstrably advance environmental and social goals, while preventing green or social-washing through clear, transparent and consistent guidelines along with standardised definitions. The ICC Principles are structured into four categories: Green Trade Finance, Sustainability-Linked Trade Finance, Sustainability-Linked Supply-Chain Finance and Social Trade Finance. The Bank's adherence confirms its leadership in sustainable finance and positions it among the first endorsers of a market standard that will become a global reference.

In particular, through the development of the Principles for Green Trade Finance (PGTF), ICC aims to help trade banks and their customers reduce greenwashing risks, increase the proportion of green trade that is formally recognised so that finance can be more effectively channelled to green activities and goods, and provide clear, transparent and consistent guidelines.

By endorsing the ICC Principles for Sustainable Trade Finance, Intesa Sanpaolo reinforces its commitment to supporting the transition toward a more inclusive, responsible and resilient global economy. The Group places strong emphasis on promoting sustainable solutions that create positive impact for businesses, communities and territories, fostering innovation, transparency and social responsibility.

INTESA SANPAOLO'S STRATEGY ON IDENTIFIED CLIMATE-RELATED RISKS AND OPPORTUNITIES

Intesa Sanpaolo's climate strategy is based on a clear awareness of climate change risks (both transition and physical risks[28]) and opportunities. The range of risks and opportunities related to climate change are identified and analysed by Intesa Sanpaolo with the aim of incorporating them into the ordinary processes of risk assessment and monitoring and credit strategies. This is also reflected in the Group's commercial offering. Potential impacts, the related time horizon (short, medium and long term), actions implemented and opportunities identified for each potential risk observed, which are updated annually, with reference to both indirect and direct risks, are shown in the tables below[29].

Indirect risks related to climate change

INDIRECT RISKS – Potential impacts

	Potential risks	Risk type	Timeframe*			Business Area**							Potential Impacts
			ST (2028)	MT (2031)	LT (2050)	BdT	IMI CIB	PB	IBD	AM	INS	CC	
Transition Risks	**Climate change risk:** misalignment of economic actors with actions aimed at reducing their CO_2 emissions	**Credit risk**				○	○	○	○				**Non-financial corporation counterparties:** Introduction of climate policies and technological shifts can weaken companies' competitiveness, affecting their financial statements through reduction of earnings, alteration of business costs, need for investment, impacting their creditworthiness and solvency. **Households and retail customers:** Non-compliance with regulations or shifts in preferences towards low-energy housing may affect collateral value or generate stranded assets. Additionally, higher energy prices or policies promoting green mobility could impact families' costs and spending power and, in turn, their creditworthiness and solvency.
		Market risk					○	○	○	○	○	○	**Non-financial corporation issuers:** Introduction of climate policies and technological shifts can weaken companies' competitiveness, affecting their financial statements through reduction of earnings, alteration of business costs, need for investment, impacting their creditworthiness, solvency and the value of their financial instruments traded on financial markets. **Sovereign issuers:** Impact on real economy and financial system, coupled with social adjustments to support transition, may lead to higher costs for high-emitting nations, which, in turn could impact their creditworthiness, solvency and the value of the financial instruments traded on the financial markets. **Asset Management / Insurance:** Consequences of climate change on companies in the portfolio with consequent possible reduction in the value of assets under management or investments.
	via: ■ Policy and legal risks ■ Technology risks ■ Consumer preferences ■ Reputational risks	**Operational risk**				○	○	○	○	○	○		**Conduct:** Losses arising from an unintentional or negligent failure to meet a professional obligation to specific clients (including fiduciary and suitability requirements), or from the nature or design of a product or commitments (e.g., greenwashing). **Litigation:** Litigation and liability costs associated with climate-sensitive investments and businesses.
		Liquidity risk				○	○	○	○			○	**Credit exposures:** Impact of transition risks on customer exposures could affect the liquidity position of the Group (e.g., undrawn committed lines/default of counterparties). **Funding:** Transition risk factors may affect customers and therefore their ability to fund the Group. **Market exposures:** Transition impacts on issuers and their financial instruments might reduce the ability for the Bank to trade or liquidate assets computed in the liquidity reserves.
		Reputational risk				○	○	○	○	○	○		Deterioration of the Group's image due to unmet expectations in climate and environmental risk management or business adaptation ■ Negative perception from stakeholders and in particular from ESG investors due to nil or inadequate management of such risks ■ Possible exclusion from sustainability (ESG) indices or a worse ESG position or lower ESG rating

* **Timeframe:** The timeframe indicated below considers the analyses carried out by the Banking Group in various climate-related risks assessment exercises. The analyses are not exhaustive regarding the potential impacts that the Bank could face in the short, medium and long term and are not indicative of the materiality of the impacts assessed as detailed in the Risk Management chapter.

** **Business Areas:** BdT = Banca dei Territori; IMI CIB = Corporate & Investment Bank; PB = Private Banking; IBD = International Banks Division; AM = Asset Management; INS = Insurance; CC = Corporate Center. The areas where it is possible to observe climate-related risk impacts are here identified, based on the business relevance for those areas. This does not exclude the possibility that other areas, not indicated, may also have potential impacts. The details of the analyses conducted on the different business areas are set out in the Risk Management section.

28 For a full definition of physical and transition risks please see the 'Risk Management' chapter.
29 For further details on the Climate/ESG Materiality Assessment please see the 'Risk Management' chapter.

INDIRECT RISKS – Actions and Opportunities

	Potential risks	Risk type	Timeframe*			Business Area**							Implemented actions	Opportunities
			ST (2028)	MT (2031)	LT (2050)	BdT	IMI CIB	PB	IBD	AM	INS	CC		
Transition Risks	**Climate change risk:** misalignment of economic actors with actions aimed at reducing their CO_2 emissions	**Credit risk**	↺	↺	↺	○	○	○	○				■ Assessment of ESG and climate risks in the lending portfolio through Materiality assessment, scenario analysis, Business Environment Scan exercise and transactions risk assessment process ■ Definition of targets related to the physical intensity of financed counterparties belonging to specific sectors ■ Limits and monitoring thresholds set within the Risk Appetite Framework ■ Identification of environmental (e.g., net zero loans and medium-to-long-term financing with SACE green guarantees), social, governance and other sustainable products and transactions ■ Implementation of self-regulation policies (credit portfolio)	■ Sustainable finance: increase customer support to enforce energy transition by offering products and dedicated financial solutions (e.g., Green and Circular Economy products)
		Market risk	↺	↺	↺		○	○	○	○	○	○	■ Assessment of ESG and climate risks in the investment portfolio through Materiality assessment, scenario analysis and Business Environment Scan analysis ■ Limits and early warning setting within the Risk Appetite Framework ■ Identification of green, social and sustainable investments ■ Implementation of self-regulation policies (investment portfolio) ■ Rebalancing of portfolios	■ Increasing and expanding the range of investment products and services
	via: ■ Policy and legal risks ■ Technology risks ■ Consumer preferences ■ Reputational risks	**Operational risk**	↺			○	○	○	○	○	○		■ Assessment of ESG and climate risks through Materiality assessment, scenario analysis, Business Environment Scan analysis and operational losses monitoring	
		Liquidity risk	↺	↺		○	○	○	○			○	■ Assessment of ESG and climate risks through Materiality assessment and scenario analysis	■ Increase of Green and ESG bond own issuances ■ Increase of third counterparties' Green and ESG bond in own
		Reputational risk	↺	↺	↺	○	○	○	○	○	○		■ Assessment of ESG and climate risks through transactions risk assessment process ■ Participation in international working groups on climate change issues (e.g., UNEP FI, Net Zero initiatives) ■ Stakeholder engagement initiatives ■ Market perception and ESG rating positioning monitoring	■ Improvement of the Group's perception/image for both investors and clients
		Cross-risk actions											■ Active monitoring of ESG evolving regulations and implementation/integration of internal policies ■ Active collaboration with policy makers to highlight the need for stable and clear environmental and ESG regulations ■ Inclusion of climate risk in risk management systems	

* **Timeframe:** The timeframe indicated below considers the analyses carried out by the Banking Group in various climate-related risks assessment exercises. The analyses are not exhaustive regarding the potential impacts that the Bank could face in the short, medium and long term and are not indicative of the materiality of the impacts assessed as detailed in the Risk Management chapter.

** **Business Areas:** BdT = Banca dei Territori; IMI CIB = Corporate & Investment Bank; PB = Private Banking; IBD = International Banks Division; AM = Asset Management; INS = Insurance; CC = Corporate Center. The areas where it is possible to observe climate-related risk impacts are here identified, based on the business relevance for those areas. This does not exclude the possibility that other areas, not indicated, may also have potential impacts. The details of the analyses conducted on the different business areas are set out in the Risk Management section.

INDIRECT RISKS – Potential impacts

	Potential risks	Risk type[30]	Timeframe*			Business Area**							Potential Impacts		
			ST (2028)	MT (2031)	LT (2050)	BdT	IMI CIB	PB	IBD	AM	INS[31]	CC			
Physical Risks	**Climate change risk:** Risks related to the physical impacts of climate change	**Credit risk**				○	○	○	○				**Non-financial corporation counterparties:** Severe weather events, both acute and chronic, may impact creditworthiness and solvency of corporate counterparties, with impacts varying based on business sector and location, potentially affecting their profitability.	**Households and retail customers:** Acute or chronic climate events can damage or destroy properties, decreasing their value and increasing credit risk.	
		Market risk					○	○	○	○	○	○	**Non-financial corporations issuers:** Severe weather events, both acute and chronic, may impact creditworthiness and solvency of corporate counterparties, with impacts varying based on business sector and location, potentially affecting their profitability and the value of their financial instruments traded on the financial markets.	**Sovereign issuers:** Severe weather events, both acute and chronic may impact the real economy and financial systems, coupled with social adjustments to support businesses and population in case of physical climate events. This could lead to higher costs for nations more prone to physical risks, which, in turn, could impact their creditworthiness, solvency and the value of the financial instruments traded on the financial markets.	
													Asset Management / Insurance: Possible acute and chronic extreme weather events may cause losses on securities in managed portfolios.		
	Chronic Acute	**Liquidity risk**				○	○	○	○			○	**Credit exposures:** The impact of physical risk on customer exposures could affect the liquidity position of the Group (e.g., undrawn committed lines/default of counterparties).	**Funding:** Physical risk factors may affect customers and therefore their ability to fund the Group.	**Market exposures:** Physical impacts on issuers and underlying assets of their financial instruments might reduce the ability, for the Bank, to trade or liquidate assets computed in the liquidity reserves.

* **Timeframe:** The timeframe indicated below considers the analyses carried out by the Banking Group in various climate-related risks assessment exercises. The analyses are not exhaustive regarding the potential impacts that the Bank could face in the short, medium and long term and are not indicative of the materiality of the impacts assessed as detailed in the Risk Management chapter.

** **Business Areas:** BdT = Banca dei Territori; IMI CIB = Corporate & Investment Bank; PB = Private Banking; IBD = International Banks Division; AM = Asset Management; INS = Insurance; CC = Corporate Center. The areas where it is possible to observe climate-related risk impacts are here identified, based on the business relevance for those areas. This does not exclude the possibility that other areas, not indicated, may also have potential impacts. The details of the analyses conducted on the different business areas are set out in the Risk Management section.

30 In the physical risk section, no potential impacts and actions directly related to reputational risk have been considered. Furthermore, in the context of Physical Risks, the Operational Risk can be considered a 'Direct Risk', see next table.

31 Catastrophic events may adversely affect the profitability of the insurance business with consequent increases in claims and may exceed insurance companies' estimates of expected risks and losses leading to higher insurance premiums with a consequent possible decrease in demand for insurance.

INDIRECT RISKS – Actions and Opportunities

	Potential risks	Risk type[32]	Timeframe*			Business Area**							Implemented actions	Opportunities
			ST (2028)	MT (2031)	LT (2050)	BdT	IMI CIB	PB	IBD	AM	INS[33]	CC		
Physical Risks	**Climate change risk:** Risks related to the physical impacts of climate change	**Credit risk**	⟲	⟲	⟲	○	○	○	○				■ Assessment of ESG and climate risks in the lending portfolio through Materiality assessment, scenario analysis, Business Environment Scan exercise and transactions risk assessment process ■ Limits and early warning setting within the Risk Appetite Framework	■ Reinforced customer relations. New subsidised loans intended to restore damaged structures ■ Financing of resilient buildings and infrastructures to adapt to climate change ■ Insurance policies covering physical risks
		Market risk	⟲	⟲	⟲		○	○	○	○	○	○	■ Assessment of ESG and climate risks in the investment portfolio through Materiality assessment, scenario analysis and Business Environment Scan analysis	
	Chronic **Acute**	**Liquidity risk**	⟲	⟲		○	○	○	○			○	■ Assessment of ESG and climate risks through Materiality assessment and scenario analysis	

* **Timeframe:** The timeframe indicated below considers the analyses carried out by the Banking Group in various climate-related risks assessment exercises. The analyses are not exhaustive regarding the potential impacts that the Bank could face in the short, medium and long term and are not indicative of the materiality of the impacts assessed as detailed in the Risk Management chapter.

** **Business Areas:** BdT = Banca dei Territori; IMI CIB = Corporate & Investment Bank; PB = Private Banking; IBD = International Banks Division; AM = Asset Management; INS = Insurance; CC = Corporate Center. The areas where it is possible to observe climate-related risk impacts are here identified, based on the business relevance for those areas. This does not exclude the possibility that other areas, not indicated, may also have potential impacts. The details of the analyses conducted on the different business areas are set out in the Risk Management section.

32 In the physical risk section, no potential impacts and actions directly related to reputational risk have been considered. Furthermore, in the context of Physical Risks, the Operational Risk can be considered a 'Direct Risk', see next table.

33 Insurance: the potential impacts, defined in note 2 of the previous table, open up opportunities for the development of specific policies for extreme catastrophic events.

Direct risks related to climate change

DIRECT RISKS – Potential impacts and Actions

	Potential risks	Risk type[34]	Timeframe			Potential Impacts	Implemented actions
			ST (2028)	MT (2031)	LT (2050)		
Transition Risks	Changes in environmental regulations ■ Introduction of new greenhouse gas emission limits or new related reporting systems ■ Increase in cost of raw materials Changes in environmental regulations and standards that the Group voluntarily adheres to (ISO standards)	**Operational & Other risks**				■ Possible sanctions in case of failure to comply with new Regulations ■ Costs for upgrading heating and air conditioning systems and for new monitoring tools ■ Cost related to potential taxes connected with greenhouse gas emissions ■ Increase in costs of energy supply ■ Costs of changing the certification processes in case of changes in the standards	■ Constant and precautionary monitoring of possible changes to national and European regulations ■ Participation in dedicated training courses or workshops ■ Own emissions plan implementation and monitoring ■ Energy efficiency actions ■ Increase in the use of renewable energy sources ■ Preventive actions to replace old systems with next-generation ones with a low environmental impact, as well as consumption monitoring systems during the renovation of branches and buildings ■ Continuous and precautionary monitoring of possible changes in standards
Physical Risks	**Acute** Extreme weather events (floods, landslides, avalanche, mudslides, heavy rainfalls, hailstorms, heavy snowfall,whirlwinds, hurricanes, cyclones, coastal storms)	**Operational & Other risks**				■ Business continuity: extreme weather events may cause material damage and interruptions to the Group's operations ■ Own assets: extreme weather events may cause material damage to the assets of the Group	■ Precautionary assessment of the hydrogeological risks for buildings ■ Adoption of a business continuity plan and measures to prevent/mitigate/manage physical damage to the bank's structures ■ Creation of a platform to identify the risk level of any Intesa Sanpaolo Group real estate asset ■ Insurance to cover the risks and their impacts
	Chronic Increase or reduction in average temperatures, sea level rise, water stress and drought					■ Increase in energy supply costs connected with greater heat or electricity consumption ■ Power-outage risk due to increased energy demand ■ Sea level rise with consequent impact on buildings close to the sea ■ Potential fires due to temperature increase in areas close to the Bank's buildings	■ Energy efficiency actions ■ Increase in the use of renewable energy sources ■ Preventive actions to replace old systems with next-generation systems with a low environmental impact, as well as consumption monitoring systems during the renovation of branches buildings ■ Preventive assessment of the risk of sea level rise ■ Adoption of a business continuity plan and actions to mitigate/manage possible power outage ■ ISO 14001, ISO 50001 and ISO 45001 certifications taking into account climate change related risks ■ Creation of a platform to identify the risk level of any Intesa Sanpaolo real estate asset

34 Within direct risks, both operational and other types of risks not directly related to the prudential framework of the Group have been considered.

BUSINESS ENVIRONMENT SCAN (BES) OVERVIEW AND STRATEGIC INSIGHTS

In accordance with the guidelines provided by the European Central Bank in 2020 ('Guide on climate-related and environmental risks') and by the European Banking Authority in 2025 ('Guidelines on the management of Environmental, Social, and Governance (ESG) risks'), Intesa Sanpaolo has in place a comprehensive approach to assess **ESG risks** through the **Business Environment Scan (BES)**, initially conducted in 2024 and then updated in 2025, aimed at evaluating the potential impacts of ESG-related challenges and opportunities across the Group's business areas.

The analysis covers fourteen business areas, including Banca dei Territori (BdT), with a focus on Residential Real Estate and SMEs, and IMI Corporate & Investment Banking (IMI CIB), with a focus on the sectors of Manufacturing, Wholesale & Retail Trade, Construction, Real Estate Activities, Oil & Gas, Power Generation and Automotive & Transportation services. Additional business areas include International Banks Division (IBD)[35], Private Banking, Asset Management, Insurance and the Corporate Center[36]. The analysis encompasses eight dimensions: macroeconomic variables, competitive landscape, regulatory, political and geopolitical trends, technological trends, societal/demographical trends, transition risk, physical risk and nature-related risk. For each dimension, the assessment evaluates the potential impact and identifies the time horizon when these effects might materialise. The combined impacts across all dimensions inform an explicit judgment on how ESG risks and opportunities could influence Intesa Sanpaolo's business model over the short, medium, and long-term.

The BES qualitatively analyses the following five dimensions for each of the fourteen business areas, assessing both the potential impact and the time horizon when these effects might materialise. According to the outcome of the analysis, it is expected that 30% of the 'medium' or 'high' impacts will materialise in the short term, 60% in the medium term, and 10% in the long term. Further details for each of the dimensions analysed are provided below:

- macroeconomic variables: impacts expected in the medium-term (although a high impact is expected in the short-term for Oil & Gas and Power Generation, as these sectors are affected by energy prices);
- competitive landscape: impacts concentrated on the short to medium-term, driven by competitors having developed a climate-related offer with dedicated products & services;
- regulatory, political and geopolitical trends: significant impacts have been identified for almost every area (for 13 out of the 14 areas analysed this trend has been assessed to be 'high' impact in the short to medium-term). These entail both opportunities and risks;
- technological trends: impacts are expected primarily in the short to medium-term, highlighting opportunities to support the green transition of the banks' clients;
- societal/demographic trends: generally, more limited impacts are expected in the short-term, increasing in the medium-term driven for example by rising customers' demand for sustainable products and investments, and by increased awareness on the consequences of climate risks.

Moreover, a quantitative analysis is conducted for ten business areas (BdT, IMI CIB and IBD[37] with related sectoral focus) to measure the impact of key transition, physical and natural capital-related risk drivers on Intesa Sanpaolo's portfolios, taking into account their composition and specific characteristics, and to determine when these effects may materialise. The physical and transition risk analyses were updated leveraging the Network for Greening the Financial System (NGFS) Phase V[38] scenario, with a focus on the Disorderly Transition scenario. Meanwhile, the nature-related risk assessment was performed based on a scenario comparable with the Disorderly dynamics. The evaluation included the latest developments of the Bank methodology, which is subject to continuous enhancements and homogenisation across the various business areas, and the data currently available internally (e.g., GHG emissions, EPC data). This analysis shows that:

- Transition risk: the portfolios of the above-mentioned business areas, while not significantly exposed in the short-term, face increasing exposure over longer time horizons. In particular, residential properties are exposed to medium and long-term impacts due to regulations on emission reduction. Likewise, SMEs and Corporates, particularly in the Power Generation, Oil & Gas, Automotive & Transportation services and Manufacturing sectors, face increasing exposure to this risk in the medium to long-term, with an increasing trend over time;

35 The analysis covers VUB Banka, PBZ Bank and CIB Bank.
36 Corporate Center, responsible for guidance, coordination and control of the whole Group, as well as for Treasury and Strategic ALM, and Intesa Sanpaolo buildings, is assigned — in addition to credit risks — the risks typical of the Corporate Centre (in particular those arising from equity investments), risks relating to default exposures, Banking Book interest rate and foreign exchange risks, and risks deriving from the management of the Parent Company's FVOCI (Fair Value Through Other Comprehensive Income) portfolio.
37 The quantitative analysis is based on the most material IBD segment as of the reference date of the financial year (VUB Banka). In addition, this quantitative analysis for IBD considered both transition risk and physical risk.
38 Source: Network for Greening the Financial System (NGFS), 'NGFS Climate Scenarios for central banks and supervisors - Phase V', https://www.ngfs.net/en/publications-and-statistics/publications/ngfs-climate-scenarios-central-banks-and-supervisors-phase-v.

- Physical risk: flood events are expected to become a significant concern for residential properties especially in the long-term, while SMEs and Corporate face moderate exposure to physical risk in the short and medium-term, expected to increase in the long-term;
- Nature-related risk: generally, both SMEs and Corporate are moderately exposed in the medium to long-term, while in the short-term impacts are expected not to be material.

In addition to the risk assessment on Intesa Sanpaolo's portfolios, a separate analysis was also performed to assess transition and physical risk for Private Banking, Asset Management, Insurance and Corporate Center. To this end, dedicated methodologies were applied to capture the impacts of transition and physical risks over a long-term horizon. From this analysis, it emerges that:

- Private Banking: the analysis of exposures to Corporate and SMEs shows a low impact from physical and transition risks;
- Asset Management: the analysis covers both Corporate and sovereign issues and, overall, the expected reduction in portfolio value is limited for both transition risks and physical risks;
- Insurance: the Group's life insurance companies show greater exposure to transition risk, while the non-life companies are more exposed to physical risks. However, the analysis shows that both the Intesa Sanpaolo Assicurazioni Group and its subsidiaries are resilient with respect to both transition and physical risks;
- Corporate Center: the analysis of the Bank's ESG risk profile for a portfolio composed of debt securities, equity instruments, and derivatives indicates that, overall and in the long term, Intesa Sanpaolo's portfolio exhibits greater sensitivity to transition risks than to physical risks.

Overall, the Business Environment Scan offers useful insights on ESG-related risks and opportunities, which can be considered as one of the inputs to be assessed within the broader strategic planning process, and are also linked to the most relevant risk management processes (including ICAAP, RAF, etc.).

SUSTAINABILITY & CLIMATE MATTERS AS TRANSVERSAL DRIVERS

All the different Group structures cooperate to integrate ESG and Climate-related elements and criteria into the Group's business model and strategy. The Chief Sustainability Officer Area, alongside the ESG Control Room and its related Tables, ensures the central coordination of ESG initiatives and the monitoring of the progress.

Specifically, since 2023, the revised ESG Credit Framework has been implemented with the integration of ESG metrics into the lending and monitoring processes in relation to the Non-Financial Corporate perimeter.

Within the credit stream, in these years important results were achieved:

- **target setting:** monitoring and steering activities continued to be carried out across the highest-emitting sectors in accordance with the UNEP FI's 'Guidelines for Climate Target Setting for Banks' and most relevant for the Group[39] (Oil & Gas, Power Generation, Automotive, Iron & Steel, Aluminium, Cement, Agriculture – Primary Farming, Commercial and Residential Real Estate). On 27 January 2025, the Group received the validation by SBTi of targets for the reduction of own emissions (Scope 1 + Scope 2) and the Group's financed emissions[40]. As the NZBA reshaped its structure, evolving from a voluntary membership alliance to a reference framework, 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. During 2025, the Bank further enhanced its toolkit of sustainable lending solutions to support clients' transition (refer to the 'Sectoral Transition Plan' section in the 'Metrics & Targets' chapter);
- **EU Taxonomy Green Enhancement:** project, launched in 2022, aimed at dynamically steering the loan portfolio towards more sustainable financing, identifying new business opportunities and responding to regulatory requests (i.e., EU Taxonomy) with the aim of enhancing the Green Asset Ratio (GAR). It also focuses on promoting remediation actions for existing loans also through massive data gathering, for example on energy class for residential real estate collateral. In 2025, the project introduced an operational model for the Banca dei Territori Division, in addition to the existing one in IMI CIB Division, designed to support the verification of the Taxonomy alignment of dedicated deals.

The Green Asset Ratio (GAR) and all the EU taxonomy templates were published in the 2025 Consolidated Sustainability Statement, disclosed in accordance with the requirements of Directive 2022/2464/EU and the Intesa Sanpaolo Group aligned GAR, calculated on a stock turnover basis as of 31.12.2025, is equal to 9.19%. The change in the GAR compared with the previous financial year is affected by the introduction of the new calculation methodology introduced following recent regulatory developments. Applying this methodology to the GAR published in the previous reporting period (equal to 3.63%) would result in a restated value of 7.60%, comparable with the 9.19% recorded in 2025.

As at 31.12.2025	Total environmentally sustainable assets (millions of euro – Turnover based)	Total environmentally sustainable assets (millions of euro – CapEx based)	KPI (Turnover based)	KPI (CapEx based)
Green asset ratio (GAR) stock	26,315	30,805	9.19%	10.75%
Green asset ratio (GAR) flow	9,961	12,692	10.61%	13.51%

For further details please refer to 'Reporting pursuant to the EU Taxonomy (Regulation (EU) 2020/852)' paragraph of the 2025 Consolidated Sustainability Statement.

Among the work streams currently under way, the ESG Coordination Table, launched in 2020, also continued its activity at Group level to promote further evaluation of new methodologies application, monitor ESG activities and engagement results, share common guidelines and policies also in relation to updates to regulatory provisions and supervisory constraints.

39 Except for the Coal Mining sector, for which the Group has set a phase-out target by 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.

40 Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets. For further details on temperature rating targets please see the 'Metrics & Targets' chapter.

THE ESG CREDIT FRAMEWORK AS PART OF THE CREDIT STRATEGY

The ESG Credit Framework includes ESG criteria to assist, among others, strategic lending portfolio steering and transaction pricing. In particular, the ESG Credit Framework operates on three levels:

- **sector**, with the definition of 'ESG Sectoral Color Coding', which takes into consideration ESG risks and opportunities aspects.

  As part of the ESG Sectoral Color Coding, a sectoral heatmap assigns the following sectoral strategies to each business sector:

ESG Sectoral Color Coding		Classification criteria
Red	Disengagement through policy	Sectors/sub-sectors subject to **exclusion by credit policy**
Orange	Selective disengagement through credit process	Sectors/sub-sectors with **high ESG risk** where a **transition path** is considered **not possible**
Yellow	Transition/selective engagement	Sectors/sub-sectors with **high ESG risk** where it is considered **possible a transition path**
White	Neutral	Sectors/sub-sectors where **relevant ESG-Climate risk** components are **not identified**
Blue	Positive/engagement	Sectors/sub-sectors with **predominantly positive impact**

- **counterparty**, with the introduction of an ESG score defined at counterparty level, integrated among others within Credit Strategies and the Credit Risk Appetite (CRA). For further details please refer to the 'Sustainable profile of the counterparty – ESG score' in the Focus which follows;
- **transaction**, with the definition of the framework of sustainable products/transactions, included in the 'Rules for the Classification of Sustainable Credit Products and Lending Transactions'[41]. Transactions are also analysed through ESG and Reputational Risk Profiles as part of the ESG and Reputational Risk Clearing process.

These three levels have implications in several areas: RAF, CRA, Credit Strategies - as well as on the credit granting process.

In terms of Underwriting, the process was implemented in 2023 to strengthen the approach towards ESG risks for large transactions (above a certain RWA level) envisaging specific steps (i.e., Clearing) for high ESG risk transactions, identified through ESG Score, ESG Sectoral Color Coding and sustainable product/transactions framework.

Further implementations include the automatic feeding into the underwriting procedure of the information related to the EU Taxonomy alignment for the dedicated deals which have been flagged as 'EU Taxonomy aligned'.

41 The 'Rules for the Classification of Sustainable Credit Products and Lending Transactions' were updated at the end of 2025, and reporting in accordance with the new Rules will be available starting from FY 2026.

Focus:

Sustainable profile of the counterparty – ESG score

In 2021 Intesa Sanpaolo developed a proprietary methodology for assessing the sustainability performance of client companies, the ESG Score. The ESG Score is a qualitative-quantitative assessment that analyses information on the Environmental, Social and Governance profile of a client company and takes into consideration both the risks to which it is exposed and the opportunities that can be developed. Starting from 2022, the ESG Score feeds into some of the main risk and governance processes within the Group's Credit Framework. The Score analysis is carried out on more than 100 parameters (for larger companies), both precise data relating to environmental, social and governance issues, such as CO_2 emissions, water consumption, environmental certifications, policy for reducing the use of natural resources and indicators of possible controversies that allow analysis of risks and points of attention related to these issues. The data used to build the ESG Score come both from internal sources, deriving from knowledge of customers and from external sources through a panel of leading data providers. The ESG Score is a synthetic assessment which breaks down into three pillars (Environmental, Social and Governance):

- the Environmental Pillar assesses the company's performance in various environmental thematic areas; it includes all the areas considered by the EU Taxonomy as well as aspects of opportunities deriving from the development and sale of 'green' products and services;
- the Social Pillar analyses the quality of relationships with all the main stakeholders of the company: employees, customers and the community in which the company operates;
- the Governance Pillar assesses the company's alignment with the ethical principles and best corporate governance practices, also taking into account diversity in the composition of the administrative bodies as well as their independence and the quality and transparency of reporting.

Intesa Sanpaolo ESG Scoring: knowing the ESG profile of its customer base...

ESG descriptors used in ESG Score

E	Carbon Footprint
	Climate - Transition Risk Readiness
	Climate - Physical Risk Readiness
	Water
	Natural Resources and Biodiversity
	Waste & Pollution
	Circular Economy
	Green Products and Solutions
S	Labour Management & Standards
	Occupational Health and Safety
	Human Capital Development
	Employee Engagement, Diversity & Inclusion
	Customer Relations and Consumer Protection
	Product Quality, Safety and Communication
	Human Rights and Community Relations
	Social Inclusion and Economic Dev. Solutions
G	Board Structure and Remuneration
	ESG Governance Strategy & Disclosure
	Ownership & Control
	Audit, Tax & Risk Management
	Business Ethics & Political Engagements
	Business Relationships

- **Quantitative and fact-based** approach, combining **multiple input sources** and covering **both corporate and SME** borrowers
- Leveraging **direct access to clients to enrich and integrate** ESG information, further features include the use of **advanced analytics, such as natural language processing (NLP)**
- **More than 100 parameters** used (for larger companies)
- The Score covers **~> 240,000 counterparties**

...to foster ESG responsible behaviours, mitigate financial risks and improve transparency for all stakeholders

Securitisation	ESG Score used as **portfolio selection criteria**
Credit Strategies	**FTP add-ons/ discounts** to steer originations
Risk Appetite	ESG Score in **input for counterparty risk tolerance definition**
Credit Decisions	ESG Score used for **counterparty level due diligence during** credit process
Business Development	ESG Score used in the context of **pre-screening for potential prospect clients**
Monitoring & Reporting	Periodic monitoring and reporting of credit book **ESG profile evolution**

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. Following the initial implementation for non-financial corporate counterparties in 2022, the ESG Scoring Model has been continuously enriched to assess new portfolio segments and counterparty types and to improve the databases that feed the scoring model. In this regard, the ESG Scoring Model has been updated to capture the specificities of Project Finance operations, to include Sovereign entities, as well as part of the Financial Institutions counterparties and to assess corporate clients of all Banks within the perimeter of the International Banks Division that operate in the European Union.

The initiatives of data collection in IMI Corporate & Investment Banking and Banca dei Territori's corporate clients through a specific ESG questionnaire continued throughout 2025. The questionnaires aim to supplement the Group's existing ESG database while minimising the workload for clients and the sales network. Additionally, they provide participant customers with a positioning report, enabling companies to objectively assess their sustainability performance according to key quantitative metrics (e.g., CO_2 emissions intensity or water consumption). These metrics are compared both with the average of their sector and with the average performance of Intesa Sanpaolo's corporate customers.

THE TRANSITION TO A GREEN AND CIRCULAR ECONOMY

Intesa Sanpaolo's strategy remains strongly committed to actively supporting its clients in the transition towards a low-carbon economy, fostering sustainability across all dimensions. This includes facilitating the generation and consumption of renewable energy, promoting energy efficiency, advancing the unique circular economy model and encouraging clients to reduce their environmental footprint. The Bank achieves this by offering a wide range of climate-related loan products and services, integrated within innovative financial solutions.

The primary objective is to provide solutions that are adaptable across multiple sectors, ensuring comprehensive support for the transition of all client segments. Intesa Sanpaolo's transition finance offering is therefore holistic, encompassing a diverse array of targeted lending solutions, capital market products and advisory services. This integrated approach reflects the multifaceted nature of client relationships and ensures that the Bank's support is tailored to meet all client needs effectively.

Specific products and services are designed for Large Corporates, Corporates, Small Businesses and Retail customers. These offerings are customised not only to align with the unique needs of each customer segment but also to promote sustainability goals across the value chain, thereby advancing the broader agenda of a sustainable, low-carbon future.

THE GROUP LENDING OFFER

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 the period 2021-2025, new lending in support of the green economy, circular economy and ecological transition amounted to around €89.4bn out of the €76bn, while new green mortgages in 2025 amounted to €6.3bn (€15.2bn in 2022-2025) out of the €12bn of new Green lending to individuals throughout the 2022-2025 Business Plan.

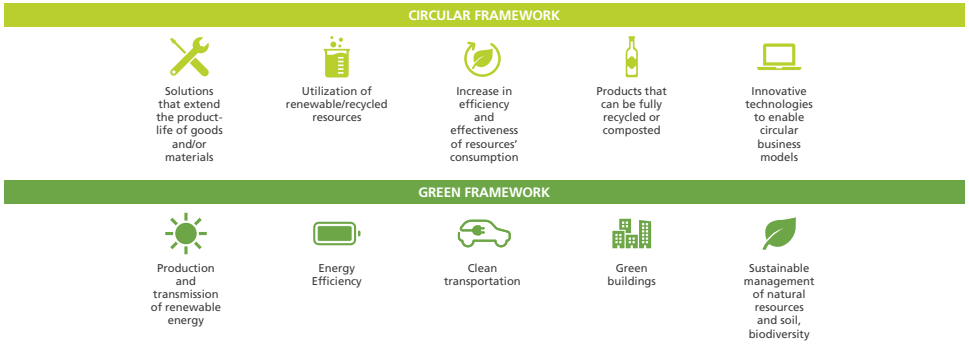
New dedicated lending to support the Circular Economy

Within the 2022-2025 Business Plan, the Intesa Sanpaolo Group 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 Intesa Sanpaolo is a Strategic Partner, continued throughout 2025.

With a view to concretely support businesses active in the green and circular transition process, the Intesa Sanpaolo Group has confirmed its credit offer dedicated to the circular economy and green projects (initially inaugurated with the 2018-2021 Business Plan), allocating €8bn over the 2022-2025 Business Plan period. The dedicated credit facility is 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 favourable conditions to access credit.

Within the credit process, Intesa Sanpaolo Innovation Center, on the basis of 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 credit facility is dedicated to the Green framework, on the basis of five eligibility criteria aligned with the Green, Social and 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.

Eligibility criteria to access the Circular Economy Dedicated Credit Facility[42]



During 2025, through the specialised support of Intesa Sanpaolo Innovation Center, 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).

In general, numerous company projects were supported for initiatives such as the replacement of critical materials from fossil sources with others from recycled or biological sources, the reuse of urban organic waste for the production of biomethane and compost and recovery of CO_2, the revamping of renewable energy plants with extension of useful life and increase in production capacity, recovery of industrial production waste for reuse in new product lines.

Solutions for large corporate

ESG Advisory

IMI Corporate & Investment Banking supports companies throughout the entire process of designing and executing sustainable initiatives, as well as in the implementation of long-term sustainability strategies and transition-related investments. The ESG Advisory Team, established in 2023, provides assistance to IMI Corporate & Investment Banking's Corporate, Financial Institutions, Sovereign and Supranational Agencies clients by offering tailored sustainable finance solutions. This activity is consistent with the ongoing development of IMI Corporate & Investment Banking's ESG offering, which currently includes a comprehensive range of instruments (e.g., loans, bonds, securitisations, guarantees, and others).

In particular, the Team supports the aforementioned clients in structuring customised ESG instruments aligned with their sustainability strategies and transition plans. In close coordination with the customer coverage units and relevant product desks, as required, the Team ensures end-to-end support — from transaction origination and selection of the most appropriate sustainable instrument, based on the client's financial needs, to the structuring and preparation of legal documentation and all related activities.

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. In terms of sustainability and climate solutions, in 2025 the Group supported its clients with loans, bonds, guarantees, securitisations and hedging.

Dedicated use of proceeds solutions include:

- **Green loans:** instruments that only finance or refinance, fully or partially, new and/or existing eligible Green projects and investments. These solutions enable companies to finance projects with a significant environmental impact, including Research and Development activities, in alignment with the LMA (Loan Market Association) Green Loan Principles;
- **Green, Social and Sustainability bonds**: bond instruments whose proceeds will be exclusively used to finance and/or refinance new and/or existing eligible green and/or social projects/assets which provide clear environmental/social benefits, according to the ICMA (International Capital Market Association) Green Bond Principles, Social Bond Principles and Sustainability Bond Guidelines.

The offering also consists of **Green Convertible bonds** as well as **Project Finance facilities** dedicated to the renewable energy sector (e.g., wind, photovoltaic and hydro).

General corporate purpose solutions include:

- **Sustainability-linked loans:** credit lines, guarantee lines, or letters of credit that, through an incentive/penalisation mechanism, encourage companies to set and achieve their sustainability goals. Sustainability-linked loans can be used for general corporate purposes, without a specific use of proceeds, and are structured in accordance with the LMA (Loan Market Association) Sustainability-Linked Loan Principles;

42 Updated at the end of 2025 and reporting in accordance with the new criteria will be available starting from FY 2026.

- **Sustainability-linked bonds:** general corporate purpose instruments not linked to a specific use of proceeds. These bonds embed an incentive/penalisation if the issuer achieves/does not achieve predetermined ESG targets and are structured according to the ICMA Sustainability-Linked Bond Principles.

2025 CASE STUDIES

Intesa Sanpaolo, through its IMI Corporate & Investment Banking Division, acted as financial advisor to BayWa r.e., a Germany-based independent power generation operator, on the sale of a 199 MW renewable energy portfolio in northern Spain to Encavis AG, one of Europe's leading renewable energy producers. The portfolio comprises three wind farms and two solar plants. The Bank also acted as advisor to Abu Dhabi Future Energy Company (Masdar) on a joint investment with Iberdrola in the 476 MW Baltic Eagle offshore wind farm in Germany.

As part of its commitment to developing innovative ESG solutions, IMI Corporate & Investment Banking has structured a cash management instrument for Boggi Milano an innovative Sustainability-Linked International Cash Pooling, a financial system that combines efficient liquidity management with the commitment to sustainability. The pricing of the Cash Pooling is linked to the achievement of predefined ESG targets, related to key areas such as decarbonisation, renewable energy and circular economy. Thanks to this solution, Boggi will be able to efficiently optimise global liquidity, reduce operating costs, ensure greater centralised control, and support the achievement of the Group's ESG objectives. This represents the first ever Cash Pooling in Europe linked to sustainable features, showcasing how a financial tool designed to optimise corporate liquidity can be effectively aligned with a company's sustainability strategy.

Sovereign Wealth & Pension Funds

In 2025, IMI Corporate & Investment Banking played an active role in several ESG-related transactions promoted by Sovereign Wealth Funds and Public Pension Funds, among which: Active Bookrunner in the Saudi Arabia's Public Investment Fund (PIF) €1.65bn debut green bond issuance and Global Coordinator & Bookrunner for the ~€700mln financing towards Stockholm Exergi, a Swedish district heating company co-owned by a consortium of European pension funds led by APG, for the construction of one of the world's largest bio-energy carbon capture & storage (BECCS) projects in Sweden.

Debt Capital Markets

In relation to fixed income market activity, in 2025 the IMI Corporate & Investment Banking Division participated as Lead Manager in the placement of 31 Green bonds (for a total issued amount close to €23.05bn), 6 Sustainability-Linked bonds (for a total issued amount of €5bn), and 4 Social bonds (for a total issued amount of €2.1bn) in the Eurobond market.

Derivatives

IMI Corporate & Investment Banking also offers hedging products and strategies, which include ESG features, aiming at supporting corporates and financial institutions to manage financial risks through a wide range of solutions. Intesa Sanpaolo is further enhancing its offering in this area to support a more sustainable economy.

The goal is not just to be a financial partner in providing funding, but also to assist clients in managing market risks associated with the clients' businesses. Leveraging Intesa Sanpaolo's expertise in risk management, clients can explore a range of bespoke hedging solutions underlying several asset classes and aligning with ESG goals:

- bespoke hedging products: Intesa Sanpaolo was among the first financial partners in Europe to offer ESG-asymmetric derivatives for interest rate and FX risk management, consisting of a rewarding mechanism lowering the cost for the client in case some pre-agreed sustainability performance targets are achieved by the client at certain checkpoints;
- securitisation (e.g., ESG-linked securitisation programmes): Climate-oriented securitisations incorporate pricing mechanisms tied to specific climate targets, with adjustments to spreads based on performance. This approach aligns working capital financing with indicators reflecting the sustainable development goals of the originating company. By linking financial sources to environmental metrics, these solutions incentivise and financially reward businesses for achieving their climate-related objectives, fostering a direct connection between sustainable practices and the cost of financing. At the end of 2025, IMI Corporate & Investment Banking has under management 13 transactions linked to climate change targets (i.e., renewable energy generation and CO_2 Scope 1 & 2 emissions).

Solutions for Corporate and for Small and Medium-Sized Enterprises (SMEs)

In 2025, Intesa Sanpaolo Banca dei Territori Division's offer in the ESG and Climate domain continued. Banca dei Territori provides customers with a set of solutions[43] to meet their needs along the entire path of sustainable development.

The ESG Platform and ESG Questionnaire

The ESG Platform is a modular and transversal solution aimed at addressing specific ESG topics and is available to SMEs and Agribusiness enterprises in their internet banking or through their Relationship Manager. The platform is a tool with several features, allowing customers to:

- fill in the ESG questionnaire, based on 32 questions (out of which 9 related to environmental topics), that allows the client to carry out a self-assessment of its own sustainable performance;
- immediately after completing the ESG questionnaire, consult the positioning report in the dashboard, which provides a benchmark of the customer's ESG positioning with respect to both the companies in the sector to which it belongs and the market average, calculated on the Bank's customers;
- receive suggestions, also based on the questionnaire results sent by the Relationship Manager, aimed at offering solutions better suited to the objectives and peculiarities of each company.

During 2025, the tool was enhanced with a new module for the Impact Department, which includes the Impact Tracker RIM ('Rilevatore IMpatto') Questionnaire, a proprietary impact assessment.

The ESG platform access and the ESG questionnaire filling are the first steps to enable the company to understand its positioning and increase awareness on its ESG performances and, consequently, take action to improve its ESG profile and enhance its sustainability commitments.

For the Bank, the ESG Platform represents an opportunity to:

- collect ESG information directly from the customer and improve the calculation of Intesa Sanpaolo's 'ESG score';
- understand the specific needs of the customer and support the company along the transition path through a dedicated set of financial and non-financial products and services.

During 2025, it has continued the awareness-raising activity on filling out the questionnaires.

Focus:

'Il tuo futuro è la nostra impresa' plan

During 2025, continued 'Il tuo futuro è la nostra impresa', a plan for the growth and future of the Italian entrepreneurial system that provide financing to accompany the planning of businesses. The objective is to encourage new investments for competitiveness by accelerating the dynamics of good performance of the production system and ensuring the immediate activation of sustainable and long-term strategies. One of the pillars of the plan is the Orizzonte Impresa Transizione Energetica Programme, which focuses on facilitating businesses' transition. It covers a range of areas, including renewable energy, energy efficiency and the circular economy. The offer includes financing to reduce energy dependence, mechanisms to address high raw material costs, specialised consultancy services and the implementation of complex projects.

43 Banca dei Territori loans are consistent with Intesa Sanpaolo's 'Rules for the Classification of Sustainable Credit Products and Lending Transactions'.

Sustainability-linked loan offer

For small and medium-sized enterprises that invest in improving their sustainability profiles, Intesa Sanpaolo has developed several solutions such as the S-Loan, which includes three general purpose credit lines as well as a dedicated medium to long term financing solution, the S-Loan Progetti Green.

Considering the ESG general purpose financing offering, Intesa Sanpaolo offers three S-Loan lines: S Loan ESG, S Loan Diversity and S Loan CER. These are not linked to a single specific investment but to the overall sustainability strategy of the company. This solution aims at financing SMEs sustainable growth projects, associating their economic and financial decisions with their environmental and social impacts and assisting them on the path to structural change.

Within the ESG general purpose S-Loan offering, the customer defines annual objectives on 2 ESG KPIs chosen among a selection proposed by the Bank. If the objectives are achieved, the customer benefits from a reduced interest rate for the following year. The KPIs performance is monitored by the Bank on an annual basis and certified by the company in the notes to the financial statements. In addition, once the S-Loan financing mechanism is activated, this includes a donation from Intesa Sanpaolo to support charitable projects in which the financed company can also participate.
To respond to different clients' needs and to cover the multiple aspects of sustainability across ESG dimensions, Intesa Sanpaolo originally designed six ESG general purpose S-Loan, that in 2024 has been redesigned in these three lines: S-Loan ESG; S-Loan Diversity and S-Loan CER. The latter is a facility that Intesa Sanpaolo makes available to companies that decide to invest in renewable energy and share the energy produced and not self-consumed in the RECs[44] (Renewable Energy Communities).

In particular, Intesa Sanpaolo collaborates with Enel X and Regalgrid in the context of Renewable Energy Communities (RECs). These partnerships aim to encourage businesses to establish and participate in RECs, while also providing Intesa Sanpaolo with the opportunity to financially support investments aimed at achieving sustainability goals for companies (e.g., installing renewable energy production facilities).

2025 S-Loan general purpose financing offering range

	S-Loan ESG 6 KPIs	S-Loan CER 2 KPIs	S-Loan Diversity 4 KPIs
	Initiatives on the **3 ESG areas** to **improve** the **sustainability profile**	Goals focused on **Renewable Energy Community**	**Enhancement** and **promotion of gender equality** and **the role of women** in the socioeconomic context.
E	■ Provision of electricity sourced **entirely** from **renewable or bioenergy sources** ■ Introducing a **procurement policy** that integrates environmental concerns on purchasing, transportation and energy practices	■ Investments in **one or more energy self-sufficiency renewable** plant ■ **Allocation** of energy produced and not self-consumed to the **Renewable Energy Community**	
S	■ Share of turnover dedicated to **community support activities** ■ Share of customers and/or suppliers **engaged in sustainability issues**		■ **Introduction of initiatives to promote the role of women in society** ■ Share of new hires dedicated to female employees
G	■ **Hours of training** per individual worker on environmental/social sustainability issues ■ Development of **employee welfare programmes**		■ Introduction of policies to **promote gender equality** ■ Development of **welfare programmes for female employees**

44 RECs are Renewable Energy Communities, legal entities formed by private citizens, organisation and businesses that consume self-produced energy from renewable sources. Their main purpose is to provide environmental, economic, or social benefits to their members and the areas in which they operate.

The S-Loan ESG and S-Loan CER facilities can be assisted by SACE (the Italian Export Credit Agency) Growth Guarantee[45].

In addition to the three general purpose S-Loan lines, S-Loan Progetti Green[46] is a medium to long term dedicated financing solution designed to support specific and clearly identified business investments that can generate a positive environmental impact on processes, infrastructures, technologies, services and products. This facility can be applied to the following Sustainable Environmental Projects:

1. Clean energy
2. Efficient Energy
3. Safe Environment
4. Agriculture and Territory
5. Biodiversity
6. Green Mobility
7. Water Efficiency
8. Climate Change
9. Circular Economy
10. Green Buildings

The funding is aimed at supporting one of the Sustainable Environmental Projects, among those listed above, identified in the description sheet of the investment plan submitted by the customer. Furthermore, a further discount on the financing rate may be granted if the customer makes the investment by the agreed date.

Support for businesses in renewables and efficiency investment plans and other initiatives

- 'Energia Impresa' loan is a medium/long-term financing for professionals and businesses interested in the implementation of investment programmes in the energy sector, especially in the Renewable Energy sector, biomethane and energy efficiency interventions. The product is a flexible solution both in terms of customisation of financing and adaptability to different lines of intervention:
  - Renewable Energy plants (photovoltaic, wind, hydroelectric, residual gas from sewage processes);
  - Biogas plants, for the production of electricity;
  - Biomethane plants, for the production of biomethane for transport;
  - Energy Efficiency interventions, for investments aimed at improving the energy efficiency of buildings, plants, processes.

  In 2025, ~€74mln of loans were disbursed.
- MLT Loan with SACE Growth Guarantee[47]

  Within Intesa Sanpaolo products and services offering, medium/long-term financing with SACE Growth guarantees was introduced on 1 April 2025, which includes support for both general investment and environmental sustainability (Green Module), replacing medium/long-term financing products with SACE Green and SACE Futuro guarantees. The Green Module supports the needs of businesses by supporting the implementation in Italy of projects that aim to facilitate the transition to an economy with a lower environmental impact, integrate production cycles with low-emissions technologies for the production of sustainable goods and services, and promote new mobility with lower pollutant emissions. The medium/long-term loans designed for projects with these characteristics can benefit from the SACE Growth Guarantee, which provides significant coverage of the loan amount over a long-term, offering companies flexible, long-term support.
- Nova+

  Nova+ is the medium/long-term financing product aimed at supporting companies that invest in Research and Innovation (R&I). The product concept involves a technical-industrial evaluation of the research project conducted by Intesa Sanpaolo through a team of engineers specialised by sector. Among the new lines, Nova+ Green, Nova+ Mobility and Nova+ Agritech provide a specific focus on climate and sustainability.
- EIB and EIF provisions

  The collaboration with the European Investment Bank (EIB), the institution through which Intesa Sanpaolo can allow its customers to access funds with advantageous conditions, continued and further developed during 2025. With these resources, the Group was able to support investment projects also relating to the production of Renewable Energy, energy efficiency and reduction of environmental impact, with the possibility of exploiting favourable rate conditions in combination with SACE Growth Guarantee products, Energia Impresa and S-Loan Progetti Green. In December 2025, two agreements with the European Investment Bank (EIB) were successfully concluded: a new €500mln funding ceiling, intended to finance investments by SMEs and mid-caps, with 25% of the funds earmarked for green investments, and a €200mln guarantee ceiling to guarantee new medium-term loans for investments by mid-caps, with 25% of the ceiling dedicated to green projects according to the eligibility criteria defined by the EIB. During 2025, the bank's support for SMEs and Small mid-caps companies continued through the granting of guarantees

45 Available until 31.10.2025.
46 S-Loan Green Projects.
47 Available until 31.10.2025.

under the InvestEU programme of the EIF (European Investment Fund). Thanks to the use of these guarantees, the bank has supported access to credit for businesses through medium/long-term financing with a focus on 'sustainability'.

Filiere Sostenibili (Sustainable Supply Chains Development Programme)

The programme was launched in 2023 to promote sustainable transition across the entire supply chain. Suppliers or retailers, involved in the programme by the Supply Chain Leader, can access financial support for ESG investments on favourable terms and be engaged in awareness initiatives within the supply chain on ESG issues in collaboration with the Bank (e.g., ESG webinars).

Filiere Sostenibili includes three key elements

Awareness Initiatives on ESG Topics for the supply chain

Through dedicated events and webinars

Investment support to improve the ESG profile

Through financing solutions on favourable terms for companies belonging to the Programme

Awareness of ESG positioning

Through a dedicated ESG vs. market benchmark positioning report, calculated on the Bank's customers

CO_2 Mitigation Solutions

In 2025, Intesa Sanpaolo launched a new programme, CO_2 Mitigation Solutions, designed to offer innovative tools to support corporate clients' efforts to measure and reduce their CO_2 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 CO_2 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.

This new initiative expands and enriches Intesa Sanpaolo's commitment to environmental sustainability and in particular to the protection of natural capital and the fight against climate change. It is an offer made possible by the deep relationship that binds Intesa Sanpaolo to its customers, in which the bank acknowledges and responds to the growing attention of businesses to good environmental practices in business processes and climate change mitigation projects.

On the one hand, CO_2 Mitigation Solutions provides a tool for measuring the generated CO_2 emissions, in order to define reduction targets and actions through interventions in business processes. On the other hand, it gives corporate clients access to carbon credits certified by international standards for residual emissions, financing projects selected by the Bank with a high environmental impact that incentivise forest protection and generate important co-benefits in terms of biodiversity and support for local communities.

Solutions for retail customers

Green Mortgages

The Group supports retail customers' green projects, including the following:

- Green Mortgage: a preferential-rate mortgage designed to facilitate the purchase, construction, or renovation of residential properties in Italy, ensuring a high energy efficiency rating;
- EeMAP Project (Energy efficient Mortgages Action Plan): a European initiative aimed at creating energy-efficient mortgages to incentivise building retrofits and the purchase of highly energy-efficient properties.

The provisions of the European Directive on the Energy Performance of

Buildings (EPBD) envisages the progressive retrofitting of the EU member states' building stock. In this context, the banking sector is encouraged to play a transformative role in directing financial investments towards activities that contribute to reducing the EU's dependence on fossil fuels, thereby supporting the achievement of the Union's climate objectives, including Net Zero emissions by 2050.

The Group's financing solutions are available not only to support the purchase or construction of energy-efficient properties but also for those seeking to improve energy performance through measures such as replacing windows and high-efficiency boilers, purchasing eco-friendly vehicles and installing solar and photovoltaic panels.

To this end, the Bank offers the '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. For each green mortgage granted, the Bank donates a part of the first mortgage payment to support environmental protection projects.

Moreover, within the Group, the green mortgage product has been progressively developed across the International Banks Division, starting from 2023. Currently the product is actively commercialised in Slovakia, Croatia, Hungary, Slovenia, Romania and Serbia.

It's worth mentioning that in 2025 VUB Banka (Slovakia) made available, on its public portal, a dedicated tool designed for assessing energy efficiency interventions for individual clients.

As mentioned above, Intesa Sanpaolo participates in the EeMAP project and has also joined the Energy Efficient Mortgage Label (EEML)[48]. The EEML seeks to maximise regulatory alignment of the Bank's portfolio with key legislative and policy developments, such as the EU Taxonomy, the Mortgage Credit Directive (MCD), the Capital Requirements Regulation (CRR) and equivalent international frameworks.

Under the EEML framework, since 2021, Intesa Sanpaolo has been reporting quarterly aggregate data on both its green and standard mortgage portfolios. Consistent with the regulatory framework defined by EU Regulation 2020/852 on the European Taxonomy, the Bank has implemented a range of activities to collect information regarding the energy performance of properties used as collateral for mortgage applications.

The Bank's comprehensive knowledge of the energy efficiency of mortgaged properties serves two strategic purposes:

1. enhancing awareness of the real estate portfolio's quality, particularly in terms of energy efficiency;
2. actively supporting clients in undertaking property retrofitting initiatives aimed at reducing energy consumption and safeguarding the value of their real estate assets.

From November 2024, the Bank has introduced a new calculation methodology to assess the alignment of properties used as mortgage collateral with the **Technical Screening Criteria** outlined in the European Taxonomy.

Building on its past efforts and in step with evolving regulations, Intesa Sanpaolo remains committed to facilitating the retrofitting of Italy's building stock, thereby contributing to the achievement of the 2030/2033 targets established by the European Directive.

This commitment in the International Banks Division is also enhanced by the offer of personal loans dedicated to finance energy efficiency interventions in residential buildings.

Energy efficiency products and services

The green offering is enhanced by a range of dedicated services, some of which are provided by partner companies. These are optional supplementary services designed to assist, for instance, in assessing potential savings resulting from energy efficiency upgrades.

The Energy Efficient Mortgage Label (EEML) is a clear and transparent quality label for consumers, lenders and investors, aimed at identifying energy efficient mortgages (EEM) in lending institutions' portfolios, which are intended to finance the purchase/construction and/or renovation of both residential (single family & multi-family) and commercial buildings, with a focus on building energy performance.

48 The Energy Efficient Mortgage Label (EEML) is a clear and transparent quality label for consumers, lenders and investors, aimed at identifying energy efficient mortgages (EEM) in lending institutions' portfolios, which are intended to finance the purchase/construction and/or renovation of both residential (single family & multi-family) and commercial buildings, with a focus on building energy performance https://www.energy-efficient-mortgage-label.org/.

Focus:

Natural Capital Protection in Intesa Sanpaolo

Context

The interconnected crises of climate change, biodiversity loss and pollution pose significant threats to the environment, human well-being and the global economy. Biodiversity underpins crucial ecosystem services, such as pollination for over 75% of food crops[49] and supports more than half of global GDP. However, human activities have caused alarming damage, including the loss of 32% of forests and a 41% decline in insect species in the past decades[50]. The economic implications are profound, with natural capital loss potentially shrinking global GDP by up to USD 2.7 trillion by 2030[51]. Urgent investments in conservation and restoration, also estimating to generate €69bn in benefits by 2050[52], are crucial to mitigating these risks. In this context, nature finance has rapidly moved from the margins of sustainable investing to a central strategic priority.

Intesa Sanpaolo's natural capital strategy and offer

The Intesa Sanpaolo Group, aware of the importance of nature and ecosystem protection, has integrated natural capital and biodiversity into the Bank's governance documents, starting from the Code of Ethics, where protection of nature and biodiversity are taken into account both in terms of direct and indirect environmental impacts resulting from the Bank's activities.

In line with the 2022-2025 Business Plan's commitment to protect and restore natural capital, Intesa Sanpaolo adopted a specific policy on biodiversity aimed at facilitating and supporting financing that seeks to strengthen and/or safeguard biodiversity and nature. Consistently, the Group has launched several initiatives to support companies in their ecological transition, including the offer of medium-long term loans such as the S-Loan Progetti Green, which applies, among others, to initiatives relating natural capital such as biodiversity, pollution prevention and control, sustainable management of natural resources, circular economy and water efficiency. In addition, Intesa Sanpaolo offers the MLT Loan with SACE Growth Guarantee[53], a medium/long-term financing facility that can be also used to support projects focused on reducing pollution, protecting water and marine resources and preserving and restoring biodiversity and ecosystems.

In this context, within the climate credit framework, the ESG scoring model integrates information on nature issues, including water consumption, waste and pollution, as well as alignment with the European Taxonomy, to support financing towards virtuous counterparties also for issues related to nature.

In 2025, the Group continued to promote the Think Forestry programme (launched in November 2023) to accompany client companies on the path of environmental transition, with the objective of safeguarding and enhancing natural capital. In order 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 both 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. Up to 2025 fourteen interventions were carried out across various areas in Italy, resulting in the planting of over 19,000 trees.

Outside the Think Forestry programme, Intesa Sanpaolo also supported a tree planting initiative in Puglia with Fondazione Sylva in Nardò, in the province of Lecce. The trees were chosen from native Mediterranean scrub species, as they are more resistant and suited to the area. The goal is to increase the woodland area in two intervention areas, totalling approximately 3 hectares, providing the community with a new green lung that will contribute to safeguarding biodiversity and mitigating the effects of climate change.

In addition to safeguarding Italy's natural capital, Intesa Sanpaolo is expanding its commitment to protecting natural capital and fighting climate change through CO_2 Mitigation Solutions programme, which enables its customers to protect the environment through selected

49 Source: 'The business case for biodiversity', European Commission 2020.
50 Source: 'Nature Risk Rising' World Economic Forum Report, 2020.
51 Source: World Bank.
52 Source: European Commission's Impact Assessment Study.
53 Available until 31.10.2025.

international projects with positive impacts on local communities and biodiversity.

Intesa Sanpaolo's engagement activities and collaborations

The Group also contributes to creating opportunities for discussions that promote the culture of change with a view to sustainability. Intesa Sanpaolo is a signatory of the Finance Leadership Statement on Plastic Pollution, along with 160 other financial institutions engaged in an ambitious environmental agreement to end plastic pollution. 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 exploring the interlinkages between circular economy, climate mitigation and nature-related impacts and their implications for banks' target setting. In 2025, the Group continued to take part in the recurring UNEP FI working groups on these topics, sharing its specific expertise in circular economy and contributing to the discussion from a broader natural capital perspective, beyond biodiversity alone, to include the preservation and enhancement of ecosystems, resource efficiency and systemic resilience. Addressing this nexus is key to fostering systemic change and collective efforts to tackle global warming, by supporting the transition towards circular economy models that help decouple economic growth from resource use, natural capital degradation and rising GHG emissions, while contributing to long-term value creation for shareholders and stakeholders.

Intesa Sanpaolo also supports the ecological transition through partnerships, awareness campaigns, including the promotion of fundraising for three projects with a positive impact on nature and biodiversity via For Funding, the Group's social crowdfunding platform aimed at non-profit organisations, as well as training activities and applied research projects. For example, the applied research projects carried out with Intesa Sanpaolo Innovation Center aimed at studying environmental attitudes and their behavioural correlates using a neuroscientific approach will continue also in 2026, with the aim of identifying effective ways to increase citizens' awareness and thus generate a positive impact on their subsequent actions regarding climate change and natural capital, recognising biodiversity as a fundamental component of natural capital and a key asset for long-term environmental and social well-being.

In addition, a study entitled Urban Regeneration, Nature-Based Solutions for Climate and Social Resilience, conducted as part of the support for the Master's Degree in Climate Change – Mitigation and Adaptation at the Polytechnic University of Turin, revealed that nature and innovation are the drivers for the cities of the future, highlighting the role of urban natural capital in enhancing climate resilience, social cohesion and ecosystem services. Furthermore, preliminary activities were completed in 2025 to enable the launch of a new applied research aimed at measuring the level of biodiversity in urban environments using a robotic system equipped with various bio-acoustic and visual sensors.

Finally, with reference to Blue Natural Capital or Blue Economy, the Group supports the One Ocean Foundation, mainly involved in research and development projects for the protection of the oceans.

Natural Capital within Asset Management and Private Banking Divisions

Eurizon Capital SGR and Fideuram Asset Management Ireland as well as Fideuram Asset Management SGR[54], have joined the Nature Action 100 initiative which focuses on engagement activities in relation to natural capital conservation and biodiversity. As part of this initiative, Eurizon also participated in collective engagements — focusing for example on the Latin American raw materials sector — aimed at mitigating deforestation and biodiversity loss, encouraging companies to align with TNFD recommendations and adopt International Union for Conservation of Nature (IUCN)'s Species Threat Abatement and Restoration (STAR) methodology to identify areas with threatened species and develop targeted mitigation strategies in collaboration with local communities and public authorities.

Moreover, all the companies above mentioned have defined ESG/climate-related policies and, in particular, Eurizon has integrated biodiversity and protection of nature aspects in its policy and has also adopted an Engagement Policy within which it has defined an internal screening methodology, called Eurizon NatureWatch, inspired by the Kunming-Montreal Global Biodiversity Framework (GBF). This methodology aims at identifying issuers that can generate negative impacts on biodiversity caused by the location of their production sites near sensitive areas and fragile ecosystems or by their own activities. This methodology aims to provide an assessment of the possible exposure of the investee companies to issues related to the exploitation of ecosystems as well as

54 Effective July 1st, 2025, the full demerger of Fideuram Asset Management SGR in favor of Fideuram - Intesa Sanpaolo Private Banking and Eurizon Capital SGR becomes effective, resulting in the cessation of its business activities.

to the potential loss of value associated with them, in order to prioritise engagement actions towards those companies characterised by greater exposure to the aforementioned criteria. In particular, in 2025, Eurizon continued these engagement actions, focusing on the assessment of risks and impacts of the business activities of the identified companies (including their supply chains) related to biodiversity, encompassing responsible management of water and waste resources as well as circular economy practices.

Finally, by exercising its voting rights at the shareholders' meetings of investee companies, Eurizon supports shareholder proposals aimed at promoting greater transparency on biodiversity conservation, circular economy and pollution and hazardous materials. In particular, in 2025 Eurizon voted in favor of all proposals aimed at evaluating the risks, impacts and business dependencies, including in the supply chain, associated with biodiversity loss and natural capital degradation.

Risk management

Intesa Sanpaolo Group defines and adopts an integrated approach to biodiversity and nature-related issues, applying specific criteria to financing activities defined in the 'Guidelines for the Governance of ESG risks' and in the 'Rules on biodiversity and nature'[55] in order to avoid the financing of activities and/or projects with particularly significant environmental impacts also related to Biodiversity ecosystems. Both policies are adopted by the entire Group.

In particular, 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:

- 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;
- categorised as 'controversial' due to their impacts or dependencies on biodiversity and nature, which may also expose the Bank to a significant reputational risk;
- 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 the economic activities with potential impact on biodiversity, nature, pollution and water.

In line with the Group's strategic guidelines and the ESG risk governance framework, Intesa Sanpaolo also pays particular attention to new projects with activities relating to sectors and/or geographical areas most exposed to ESG risks with a focus on biodiversity and nature, for which it considers specific safeguards for the assessment of these risks through the ESG & Reputational Risk Clearing process whether the new project: i) meets the characteristics provided by the Equator Principles guidelines; ii) is located in countries that do not ratify specific conventions; iii) is related to specific sectors of economic activity.

For project finance, since 2007 Intesa Sanpaolo adopted the Equator Principles, a set of voluntary international guidelines and reference standards for the financial sector that aims at identifying, assessing and managing the environmental and social risk of projects.

The Equator Principles in its Performance Standards include the Promotion of the conservation of biodiversity as well as sustainable ecosystem and natural resource management.

Regarding the potential direct impact on biodiversity and nature, Intesa Sanpaolo has defined an assessment model, applicable to all properties for functional use that, starting from the mapping of the properties included in the geographical perimeters of the World Database on Protected Areas (WDPA), defines for each of them the relative level of potential impact and the consequent possible intervention and monitoring actions, aimed at mitigating its environmental footprint on biodiversity.

55 Policy elaborated in 2024 and adopted in 2025.

Furthermore, regarding the identification and assessment of the risk, 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 (NFC) exposures (for further information on nature-related risks integration please see the 'Risk Management' chapter).

CLIENT ENGAGEMENT AND TRAINING

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.

Large Corporate Dialogue

Intesa Sanpaolo is at the forefront of fostering sustainability and environmental, social and governance awareness. Through a comprehensive approach, the bank offers dedicated meetings, focused webinars, serving as both physical and virtual meeting points to guide companies on their journey towards sustainable practices. These initiatives aim to promote dialogue, support impactful initiatives and create collective value, culminating in a holistic strategy that spans from educational content to practical tools for assessing and improving sustainable performance.

- Meetings dedicated to ESG issues: Sustainability-linked events and forums are an important component of IMI Corporate & Investment Banking engagement process with its client base on climate-related topics. The Division organises and actively participates in a number of events throughout the year as sponsor or contributor. In 2025, among others, this included ESG-focused conferences, such as: the 'IREFI Forum France - Italie de l'infrastructure des Transports et de l'Energie' in Paris; the 'CFO Utilities Conference' in Milan; the 'NetZero expo-summit' in Milan; the 'Infrastructure and Growth Opportunities for Europe and the UK: Focus on the 2025 UK Infrastructure Plan' conference in London;
- Borsa Italiana Sustainable Network: from January 2021, Intesa Sanpaolo through its IMI Corporate & Investment Banking Division, has joined Borsa Italiana Sustainable Finance Partnership, now Sustainable Network. The Network mission is to create a culture and an integrated ecosystem for the development of innovative corporate sustainable finance solutions for the Italian capital market. As a Partner of the programme, IMI Corporate & Investment Banking brings its expertise and experience on sustainability topics, which include a wide range of financial and non-financial solutions to support the development of a more sustainable economy. Thanks to this collaboration, the Division has participated in several workshops and initiatives organised by Borsa Italiana, including the flagship event 'Sustainability Week'.

Circular Economy Lab

Intesa Sanpaolo provides dedicated consulting services aimed at generating new economic and relational value for the Group and enhancing the competitiveness of business. In particular, Intesa Sanpaolo Innovation Center, in synergy and coordination with the divisions Banca dei Territori and IMI Corporate & Investment Banking, develops advisory and non-financial services, offering pathways for innovation and transition towards the circular economy. To support the shift to a circular economy, Intesa Sanpaolo Innovation Center established the Circular Economy Lab (CE Lab) in partnership with Cariplo Factory[56]. The CE Lab facilitates the transformation of the Italian economic system by promoting innovative value creation models and accelerating the transition to a circular economy through open innovation methodologies that identify innovative solutions and technologies.

CE Lab Strategy and Pillars:

- **Circular Education:** provides training courses to spread knowledge about the circular economy and related opportunities in business, competitiveness and resilience;
- **Circular Connection:** fosters dialogue on the circular economy by engaging a national and international network of companies, institutions, universities, research centers and other partners;
- **Circular Innovation:** offers tailored consultancy to accelerate the adoption of circular economy models by SMEs and large corporations.

Services offered by the CE Lab:

- **Circular Workshop:** programme designed to support the company (or several companies along the supply chain, connected to the reference supply chain manager) aiming to devise key initiatives that drive circular transformation;
- **Circular Assessment:** tool for evaluating a company's level of circularity across its value chain and identifying potential improvement actions;
- **Circular Open Innovation:** project for scouting and evaluating startups, spinoffs, innovative SMEs and/or innovative technologies to foster circular transformation;
- **Circular Project Building:** advisory service aimed at conceiving and developing new initiatives, which can be implemented through the creation of new business units/Newco/JV;
- **Digital Product Passport:** service that consists of designing a circular

56 At the end of 2023, Intesa Sanpaolo Innovation Center and Intesa Sanpaolo extended the collaboration with Fondazione Cariplo e Cariplo Factory on circular economy.

transformation path within its value chain (upstream and downstream) through the digitisation of circularity and product sustainability information;

- **Circularity Plan:** creation of a circular transformation plan supported by communication for reputational purposes to internal and external stakeholders;
- **Life Cycle Assessment and Ecodesign:** service that offers a structured assessment of the potential impact of goods or services on the environment and on human health, from raw materials to the end of their useful life, in compliance with the international standards ISO 14044:2006 and ISO 14040:2006.

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.

Over the course of the year, the CE Lab took on the role of coordinator of the Alliance for the Circular Economy, a group of Italian companies and institutions committed to leading the country towards the transformation of the economy in a circular and regenerative direction, including Intesa Sanpaolo. Among the various activities, in line with the 'Manifesto' signed on December 2024 by the participants, in 2025 Intesa Sanpaolo Innovation Center promoted the development of thematic webinars, interactive workshops and the launch of a Call4Solutions dedicated to identifying and supporting circular innovation projects.

ESG Laboratories for SMEs

Initiatives linked to the ESG Laboratories (ESG Lab) continued in 2025. The Lab is a meeting point, physical and virtual, to accompany Italian SMEs in the sustainable transition, a development path aimed at generating new competitive advantages and supporting long-term growth with positive impacts on the environment and people.

16 ESG Laboratories opened since 2021, exceeding the target set under the 2022-2025 Business Plan. The birth of the first Laboratory in 2021 in Brescia was followed by the opening, over the years, of 15 other laboratories throughout the national territory: Padua in 2021; Venice, Bergamo, Cuneo, Bari, Taranto, Rome, Naples and Palermo in 2022; Milan, Turin and Florence in 2023; Macerata, Chieti and Genoa in 2024.

The format, which in 2025 saw the realisation of over 40 events on the territory, aims to spread the culture on ESG and circularity issues and to facilitate the transition of customer companies with a structured schedule of ESG issues that ranges, also through the support of qualified partners, from risk/opportunity and regulatory scenario analysis to understanding the degree of circularity of a process or product, to the construction or conversion of a sustainable supply chain, actions to address short-term challenges (e.g., increased costs of energy, raw materials and sea freight) and/or long term eco-sustainable transformation.

Within the ESG Laboratories, Intesa Sanpaolo also offers advisory services specifically targeting ESG topics and challenges by partnering with Nativa and Circularity, sustainability-expert partners. The services enable clients to understand their ESG starting point through an assessment that identifies strengths and areas for improvement. The client's sustainable strategy is then outlined, by defining key initiatives for intervention based on the initial assessment and the identified objectives, also with the aim of obtaining the main certifications in the market.

'Imprese Vincenti' (Winning Enterprises)

To enhance Italian entrepreneurial excellences, the Group launched the sixth edition of 'Winning Enterprises' in 2025. The programme highlights the growth paths of digital and sustainable transformation and the related business models developed by companies, the engine of the country's economy. The aim is to provide selected companies, among a number of candidates, with visibility, development support programmes, consultancy on strategic issues, training and workshops in collaboration with key partners. Since the first edition in 2019, over 650 companies have received the recognition. The sixth edition will continue in 2026 with the dedicated tour throughout the national territory celebrating the 150 companies selected. Among the 3,000 candidate companies, about 40% declared that they had invested in and/or launched significant initiatives in the field of sustainability and green initiatives.

Energy Transition Consulting Services for SMEs

During 2025, the Energy & Utilities desk carried out project analysis and the formulation of a technical, economic and financial sustainability opinion on 28 operations for a total amount of about €160mln. The Energy & Utilities Desk supports entrepreneurs which have planned investments in renewable energies or intend to diversify their energy sources. This process envisages evaluating projects from the technical-industrial profile to the financial sustainability of the investment. A complete service that ranges from the risk assessment and structuring of the most appropriate financial solutions,

to advice on new market opportunities, on incentive support measures (including those of the NRRP) and on technological directions as enabling factors of the energy transition.

Initiatives for the growth of startups and the development of innovation ecosystems

Among others, Intesa Sanpaolo Innovation Center aims at supporting the growth of high-potential startups, including those focused on climate, also through the management and implementation of acceleration paths and other initiatives.

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'): in 2023, Intesa Sanpaolo Innovation Center renewed the partnership with Fondazione Compagnia di San Paolo (FCSP), Fondazione Sviluppo e Crescita - CRT and Techstars to continue to support the growth of the innovation ecosystem and strengthen Turin's strategic positioning as an attractive international hub, by signing a two-year Memorandum of Understanding. Thanks to this partnership, 'Techstars Transformative World Torino' was launched in 2024, a new acceleration programme on trend-setting advanced technologies (mobility, decarbonisation, energy efficiency, educational technology, social responsibility and individual well-being), which follows the previous programmes on smart mobility and smart cities. In 2025 the programme continued to expand its reach, embracing transformative technologies with the acceleration of 12 startups. Since launch in 2019, 69 startups were accelerated, 140 proofs of concept and other contractual collaborations were signed, more than €150mln of capital raised and more than 770 new hires;
- 'Terra Next' (focus 'Bioeconomy'): in January 2025, completed the programme for the last class of the three-year acceleration programme on 'Bioeconomy', in cooperation with Cassa Depositi e Prestiti, Cariplo Factory, local corporate and scientific partners and the patronage of the Ministry of Environment and Energy Security. In 2025 a 'Scale-up program Terra Next' was launched, aimed at supporting the scale-up of already accelerated entities in Terra Next. Since its launch in 2022, 22 startups were accelerated, >200 proof of concept and other contractual collaborations, ~€13mln in capital raised and >90 new hires;
- in 2025, the initiative of Venture Building 'Maritime Ventures', launched in 2024 in collaboration with Cassa Depositi e Prestiti, FCSP, companies of the sector, other specialised players and institutional entities of the territory, continued. The initiative aims to identify innovative ideas and launch 10 new startups (which will develop products or services for the digitalisation and innovation of SMEs operating in the nautical and port supply-chain) over the three years following its launch. Fondo Sviluppo Ecosistemi di Innovazione (Fondo SEI) of Neva SGR was also involved with an investment of €0.75mln. Since the launch, 3 potential spin-offs have been identified and in 2025 the first has been completed with the establishment of the 'Fundo.one' startup, an AI-native platform designed to automate access to financing for SMEs in the maritime sector;
- Up2Stars: Up2Stars programme, promoted by the Banca dei Territori Division, and In Action Esg CLIMATE programme, promoted by Intesa Sanpaolo Assicurazioni, focused on the support of Italian startups operating in specific fields. 2025/26 edition of Up2Stars and In Action Esg CLIMATE, launched together for the first time, are dedicated to startups operating in New Materials, Robotics, Design-Tech, and Aerospace. Completed the acceleration of 10 startups operating in the New Materials field, ongoing the acceleration of 10 startups operating in the Robotics field and launched the call on Aerospace. Since the start in 2022, 90 startups accelerated in Up2Stars programme and 11 startups received €1.75mln as part of the In Action Esg CLIMATE programme;
- during the year, two startup growth and development programmes were also implemented on behalf of clients: one in the energy sector, and the other focused on identifying solutions for the inspection of underwater infrastructures aimed at enhancing operational visibility, target identification, and the safety of offshore activities.

Neva SGR

The Intesa Sanpaolo Group's venture capital company also invests in climate tech and the energy transition, by adopting a strategy approach aimed at ensuring that each technology or new product achieves price competitiveness compared to today's alternatives over the medium to long term.

In the energy transition field, Neva SGR conducts a targeted and selective global search for companies that hold revolutionary patents or are developing breakthrough projects with the potential for large-scale industrial deployment. These companies aim to make a significant contribution to the decarbonisation of energy-intensive industries, support the development of new baseload energy sources (i.e., stable and continuous

generation plants), and enable the expansion of renewables through advanced energy storage solutions and grid optimisation technologies.

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. Founded in 2018 as a spin-off from the Massachusetts Institute of Technology (MIT), CFS focuses on magnetic confinement fusion (MCF) using high-temperature superconductors (HTS). In recent years, the company has made significant progress through the in-house production of its proprietary magnets, further strengthening its position as a technological pioneer and industry front-runner. CFS recently announced plans to build its first commercial fusion power plant in Virginia, U.S.

Neva's portfolio also includes:

- Energy Dome, an Italian excellence that developed a new large-scale, high-efficiency, high-durability battery (LDES - Long Duration Energy Storage) based on a thermodynamic process that uses carbon dioxide (CO_2) and that can optimise the storage and use of energy from renewable sources;
- Tech4planet, the national technology transfer hub for environmental sustainability, that focuses on exploiting the results of research in the field of environmental sustainability by involving the most important Italian Research Centres specialised in the subject;
- xFarm, an Italian-Swiss agritech company that developed a digital platform to help farmers optimise agricultural operations and support food producers in collecting sustainability data, while also promoting regenerative agriculture;
- Cool Planet Technologies, a portfolio company dedicated to capturing carbon dioxide from flue gas emissions in hard-to-abate sectors.

Training offer for customers

Thanks to the partnership with Digit'ED, Intesa Sanpaolo offers training on sustainability topics to companies, with the aim of supporting the development of awareness on the importance of the transition to a more sustainable economy and the acquisition of the skills necessary for sustainable business transformation. The training offering consists of flexible and customisable paths, through the provision of online training. Digit'Ed continued to develop digital training activities dedicated to businesses through its 'Digital Library' training platform, with the aim of supporting business growth, developing skills and seizing opportunities in an ever-evolving market. During 2025, the offer maintained a particular focus on ESG topics:

- ESG Base, which can be used remotely, to learn basic knowledge about ESG principles and the logic and methods with which to activate sustainability paths in the company;
- ESG Premium, which can be used in a mixed form (remote and virtual classroom), to support companies that intend to undertake or strengthen the transition towards sustainability and implement ESG solutions.

RESEARCH, REPORTS AND INNOVATION IN INTESA SANPAOLO

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[57] issued in 2025 by **Intesa Sanpaolo Research** (also in cooperation with specialised external organisations):

- the 11th edition of the Bioeconomy in Europe Report, which presents for the first time an estimate of the value of the Bioeconomy for the EU27 and provides an in-depth analysis of the plastic packaging sector, with a focus on bio-based solutions. The Report has been presented in June 2025 in Rome and in October 2025 in Bruxelles at the European Parliament;
- the Italian Hydrogen Observatory, prepared in collaboration with H2IT and Intesa Sanpaolo Innovation Center, is based on a survey of companies operating across the entire hydrogen value chain, from production to end uses. A presentation of preliminary results from the second edition took place in June 2025, ahead of its official launch at a conference in February 2026;
- Green Bond Brief, an analysis of supply and demand dynamics in the Green Government Bond Market in Europe, including forecasts on issuances;
- the second issue of the ACEA and Intesa Sanpaolo Water Sector Observatory, focused on agricultural sector uses;
- the 7th edition of the report on the performance of local public transport;
- the October 2025 Local Government Monitor covers intermodality and freight transport trends in Europe. The analysis of Italian trade flows by transport mode highlights that rail freight transport and intermodality continue to suffer from structural problems, which limit their potential to reduce CO_2 emissions, pollution and road congestion;
- the second edition of the National Research on Benefit Firms aims to study the Benefit Corporation model that aligns profit objectives with common-benefit goals for society and the environment, conducted by Intesa Sanpaolo Research, Nativa, Assobenefit, InfoCamere, the Brindisi–Taranto Chamber of Commerce, and the University of Padua (dSEA). The first edition was presented in Rome (February 2025) and the second in Milan (December 2025).

As part of its activities dedicated to sustainability, **Intesa Sanpaolo Innovation Center** contributes to the climate transition by generating knowledge and strategic value. It analyses the technological trends that enable decarbonisation, energy efficiency, and territorial regeneration, providing tools to guide decisions, investments, and partnerships. The researches carried out by Intesa Sanpaolo Innovation Center explores how innovation can generate environmental, economic, and social value, fostering the development of new models of sustainable growth and help in identifying solutions capable of strengthening the resilience of natural and production systems. In 2025, Intesa Sanpaolo Innovation Center published several researches, including a study on the decarbonisation of data centers and semiconductor innovation for 5G and 6G networks[58], as well as an analysis on emerging frontiers of smart circular buildings[59] that integrate energy efficiency, circular resource management, and cybersecurity. Further analyses on electric mobility and new materials[60] highlighted the potential of sustainable technologies and processes to advance a Net Zero economy, while research on regenerative agriculture and urban regeneration[61] showed how nature-based solutions can improve quality of life and planetary health. Finally, Intesa Sanpaolo Innovation Center contributed, together with Intesa Sanpaolo Research, to the aforementioned Hydrogen Observatory report. Some of these reports were realised by Intesa Sanpaolo Innovation Center in collaboration with National Center of Research and 'Partenariati Estesi' of RRNP.

Among its collaborations, in 2025 Intesa Sanpaolo Innovation Center, together with SRM (a Research Center for Economic Studies associated with the Intesa Sanpaolo Banking Group), published several reports, including 'Verso la Circular Blue Economy' which explores the synergies between the blue economy and circularity, showing how regenerative models and technological solutions can transform maritime sectors into engines of sustainability, innovation, and competitiveness. In January 2026, SRM also presented the seventh MED & Italian Energy Report with ESL@energycenter Lab of the Polytechnic of Turin, a research work focusing on energy supply security in the Euro-Mediterranean transition and developments in electrification, critical raw materials and technologies, further strengthening the scientific collaboration on topics relevant to sustainable industrial transformation.

In 2025 Intesa Sanpaolo Innovation Center also contributed to the publication of the White Paper 2025 'Valore Acqua per l'Italia', a key

57 Some of the publications mentioned are available in Italian only.
58 Data Center Semiconductors and Communication.
59 Smart and Circular Buildings.
60 EV Batteries in support of the PNRR MOST.
61 Urban Regeneration – Nature-Based Solutions for Climate and Social Resilience.

reference document promoted by the Valore Acqua Community[62] for shaping effective water strategies and policies.

In collaboration with external research centers and universities, Intesa Sanpaolo Innovation Center also undertakes applied research projects designed to foster multidisciplinary and advance expertise in areas such as artificial intelligence, neuroscience and robotics skills, with applications connected to climate change and biodiversity.

In 2025, a neuroscientific study on environmental attitudes and their behavioural implications continued, with the aim of understanding consumer awareness regarding climate change and biodiversity, and of developing strategies to foster a mindset more attentive to these issues. An applied research project on housing and climate risk was concluded, whose results indicated that flood risk — even in the absence of direct damage — can reduce property values by up to 4% in the most affected regions. Future projections, based on an agent-based model simulating buyers' and sellers' behaviour, suggest that depreciation driven by perceived climate risk could reach 8% in high-risk areas, while properties in safer zones may experience an increase in value.

Workshops and Events

Intesa Sanpaolo Innovation Center promotes the dissemination of knowledge and a culture of innovation through various events and workshops (both of positioning and of match-making for the meeting of the demand and offer of innovation), webinars and 'Innovation Coffees' (a format of events dedicated to the discovery and dissemination of innovation culture of short duration, max 30 minutes). Key initiatives in 2025 included:

- 'Circular Economy: redefining growth for a regenerative future', developed in collaboration with the Italian Ministry of Economy and Finance on the occasion of the 58th Asian Development Bank Annual Meeting. The workshop provided an opportunity to strengthen economic cooperation and development between Italy, Europe, and the Asia-Pacific region, highlighting the crucial role of financial institutions in driving the transition towards sustainable development models;
- 'Circular Economy: a future-proof economic paradigm'. An event organised to promote dialogue among businesses, institutions, and academia, encouraging the exchange of experiences and contributing to the transformation of the production system towards a circular economic model. The initiative aimed to foster strategic collaborations supporting the adoption of circular models and facilitate connections between the supply and demand of innovative solutions to enhance companies' long-term competitiveness and sustainability;
- 'The Circular Economy Act: Investing for a competitive Europe'. An event (in partnership with the Ellen MacArthur Foundation) that brought together industry leaders, investors, and policymakers to discuss a key question — 'how can we ensure the Circular Economy Act delivers?';
- 'Climate Change: adaptation and mitigation solutions'. University Lecture to students of the Master's in Climate Change at the Polytechnic of Turin;
- four webinars on Climate Change topics:
  - 'Living with Climate Change' and 'The impact of floods on the Italian real estate market', which explored potential future property price reductions in Italy caused by climate change;
  - 'The Paradoxes of Water', which examined the use of innovative technologies for the sustainable management of water resources;
  - 'Critical or Rare Materials?', which analysed the strategic role of rare raw materials in industrial supply chains and how different countries are responding to this challenge through new policies and tools;
- 'Innovation Meetups' (matchmaking event to facilitate the meeting between demand and offer of innovation) focused on decarbonisation technologies and climate tech;
- 'Ideas2Growth Agritech Edition', an event dedicated to startups operating in the Agritech sector, aimed at discussing innovation and sustainability issues related to the future of agriculture;
- four webinars on the circular economy and on the related Group's offer ('Intesa Sanpaolo's Group Offers') were delivered to employees of Banca Intesa Beograd; ISP Slovenia and ISP Romania; ISP PBZ; and ISP Albania, Bosnia, and VUB Banka in the Czech Republic;
- 'Towards the Circular Blue Economy'. An event presenting the Intesa Sanpaolo Innovation Center paper on the circular blue economy was organised for the ESG Laboratory Palermo, and another for the ESG Laboratories;
- one 'Innovation Coffee' focused on the reduction or reuse of waste from electrical and electronic equipment and one on the relationship between fashion and sustainability: a new paradigm also in terms of circular economy.

Academic Collaborations

As part of its partnership with the Polytechnic of Turin, Intesa Sanpaolo Innovation Center supported the sixth edition of the Master in Climate Change: 'Adaptation and mitigation solutions', reinforcing its commitment to fostering expertise in climate-related challenges.

62 The Valore Acqua Community is an initiative promoted by The European House – Ambrosetti that involves the main players of the water value chain in order to elaborate scenarios and strategies for better water management.

ADDRESSING CUSTOMER INVESTMENT & INSURANCE NEEDS

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 Eurizon's assets under management classified under Articles 8 and 9 of the SFDR 2088/2019 to €156bn in 2025 from €110bn in 2021, a goal that has been achieved in 2025[63].

The Intesa Sanpaolo Group offers a full range of investment products and services that integrate sustainability criteria into investment choices, promote environmental factors or/and aim at contrasting climate change.

Additionally, the Group's insurance offering has evolved to include innovative solutions that address sustainability challenges, such as ESG-focused life and non-life products, expanded coverage for natural disasters and incentives for adopting preventive measures and sustainable practices.

ASSET MANAGEMENT OFFER

Eurizon offers a range of 392 funds, diversified across all asset classes, which promote environmental and/or social characteristics or have sustainable investment objectives, in accordance with articles 8 and 9 of the SFDR with approximately €169bn of assets.

The products' range includes Eurizon Fund - Absolute Green Bonds, Eurizon Fund - Green Euro Credit and Eurizon Fund - Green Bonds Short Term. The funds use investment selection methodologies aimed at financing projects benefiting the environment (through investments in green bonds or labelled bonds) therefore aimed at generating positive environmental and/or social impacts, as well as a measurable financial return. As of December 2025, the funds' assets amounted to around €2bn. For detailed information please refer to the 'Metrics & Targets' chapter.

PRIVATE BANKING OFFER

The Private Banking Division offers solutions, created by the Division and the Group or selected from the proposals of major international investment firms, that promote environmental and/or social issues or that have a sustainable investment objective. The range of sustainable products aims to meet the customers' main needs, including Funds, Asset Management and Insurance products. Also in 2025, the new offer was strongly directed towards solutions that reflected the criteria adopted by the Division in terms of ESG, with an incidence of over 87%[64] of products classified under Articles 8 and 9 of the SFDR on the total of new products.

Within the in-house Discretionary Portfolio Management, during the year the Step-In programme continued across various Article 8 lines on global equities, available in the Fogli and Omnia catalogue. As part of the reorganisation of the Wealth Management division, 14 Discretionary Portfolio Management mandates of Eurizon Capital SGR, classified as Article 8, are now managed by the Investment Centre of the Private division[65]. Regarding the Fideuram Vita Futura insurance wrapper, in line with expanding the range of Article 8 products, a new Internal Insurance Fund — FV Equity World Step-In Smart Dynamic 7 — was launched. The numerous mergers between compartments during the year (some already approved but not yet effective) resulted in an uplift of assets flowing into the absorbing funds classified as Article 8 and Article 9. Finally, Fideuram Asset Management Ireland expanded its offering of Article 8 classified funds with the launch of two new Willerfunds – Private Suite compartments: JPM Global Aggregate Bond and PIMCO European Income Bond. Additionally, a new ETF, classified as Article 8 ex-SFDR, on MSCI EMU was added to the D-X ETF platform.

To complement the Group's product offering, according to the Guided Open Architecture Approach, to meet the most sophisticated needs, the Division's catalogue offers its customers the possibility to choose among a selection of third-party ESG products in collaboration with leading international investment houses.

As of 31 December 2025, 79.4% of the Fideuram Division customer assets are classified ex art. 8 and 9 of the SFDR Regulation. Of the non-Group funds (approximately €48bn in client assets)[66], more than 87% are classified under Articles 8 and 9 of the SFDR by their respective fund managers.

63 In 2025 around €169bn of assets under management classified under Articles 8 and 9 of the SFDR 2088/2019, Eurizon perimeter - funds pursuant to Articles 8 and 9 of SFDR 2019/2088. With reference to funds and AM products, around €183bn of assets.
64 Data as of 31.12.2025, internal source.
65 Effective July 1st, 2025, the full demerger of Fideuram Asset Management SGR in favor of Fideuram - Intesa Sanpaolo Private Banking and Eurizon Capital SGR becomes effective, resulting in the cessation of its business activities.
66 Data as of 31.12.2025, internal source.

INSURANCE OFFER

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.

Life Business

The Insurance Group is committed to maintaining its range of products and investment options classified under Articles 8 SFDR which promote environmental and/or social characteristics through the distribution of insurance-based investment products and pension funds.

As of December 2025, 81.2% of the options provided by the marketed products were classified Article 8 and 9 ex SFDR (48% at 2021 year-end) and all new unit-link and hybrid products launched in 2025 were art.8 ex SFDR except for Opportunità DB, whose classification depends on that of the underlying fund classification. The effort on developing new Art. 8 ex SFDR investment solutions is supported by the evolution of the investment strategies and monitoring processes.

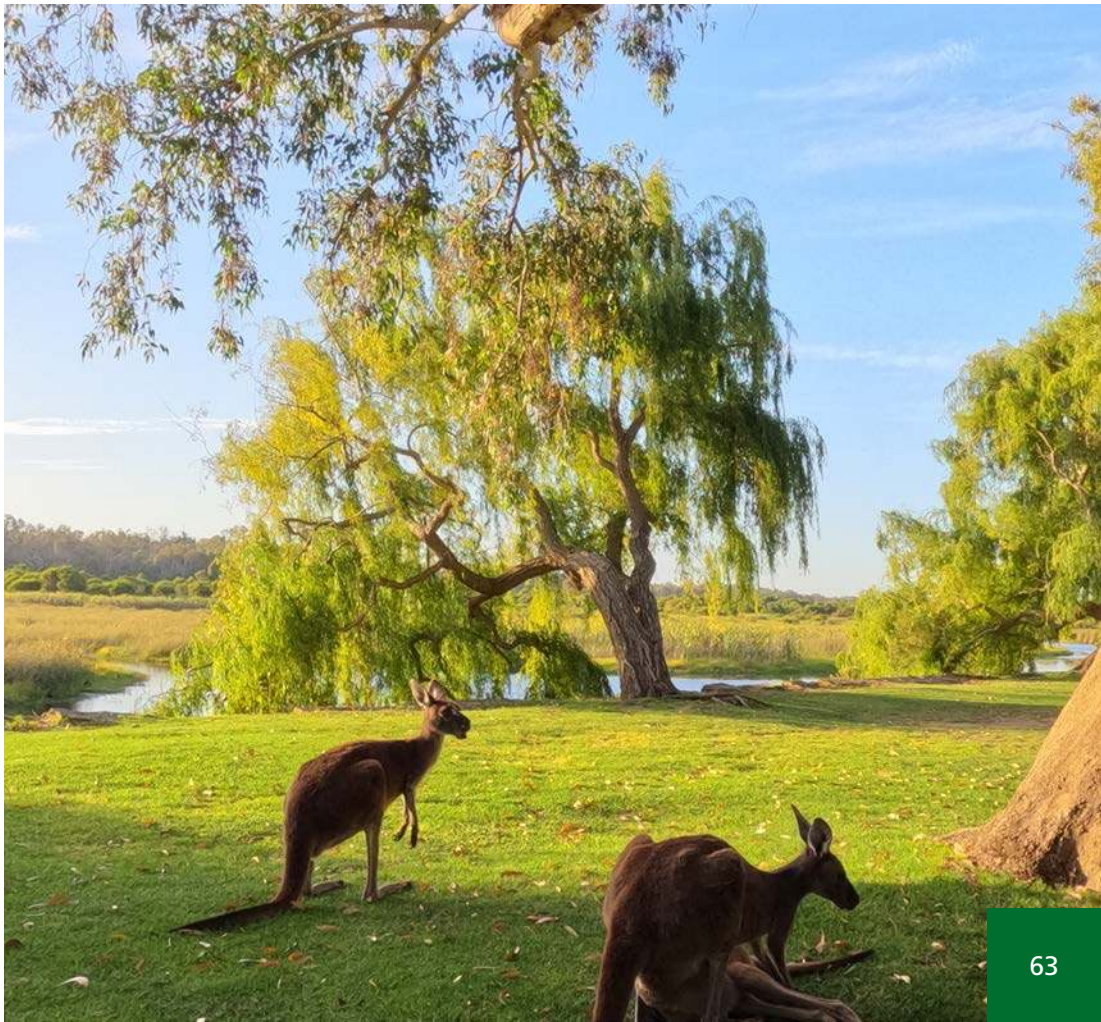
At December 2025 the assets under management relative to Articles 8 and 9 investment options were €87.7bn (46% of the total assets under management), increasing compared to €79.7bn at 31.12.2024.

Non-Life Business

In the Non-Life Business, the Insurance Group offers a wide range of products dedicated to the protection of individuals, homes, vehicles, and the needs of SMEs and the Corporate segment, expanding its catalogue of solutions for individuals with environmental and social value, including extended coverage for photovoltaic and solar installations, home assistance services and properties built according to green/eco-friendly standards.

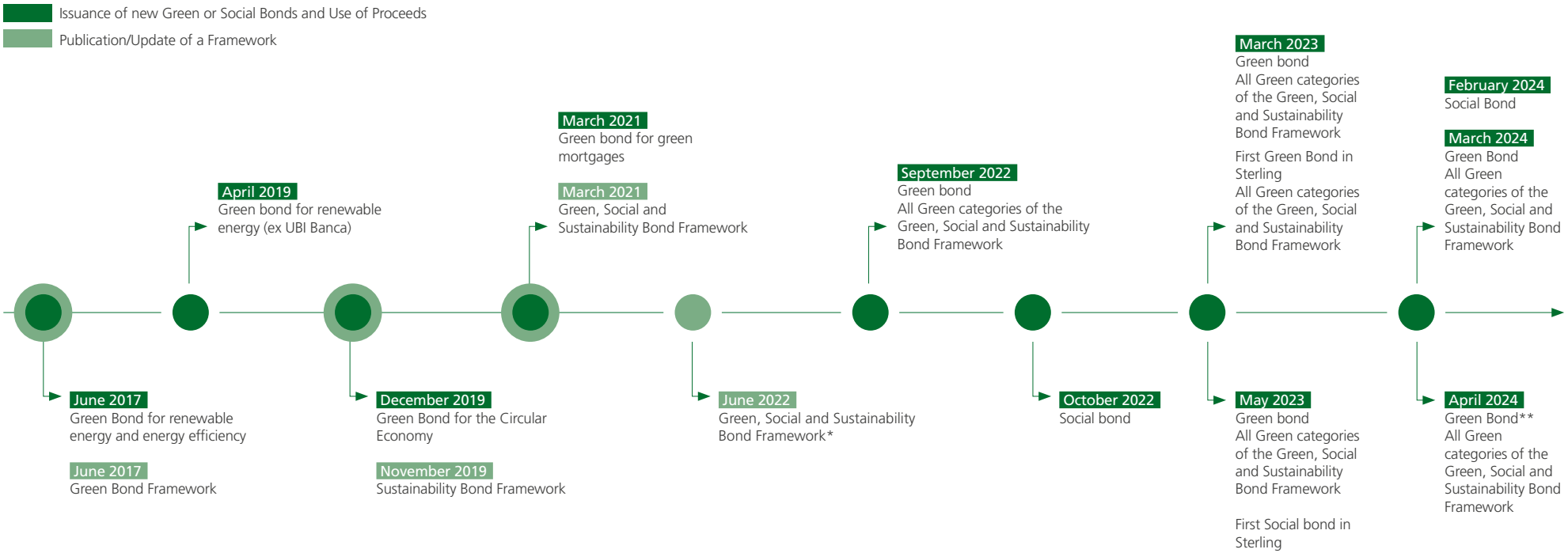
In addition, the non-life business products already include coverages against catastrophic risks and natural events, aimed at retail customers as well as small and medium-sized enterprises, with a specific focus on climate damage and products dedicated to safeguarding renewable energy plants. These have increased from €27bn in 2021 to €46.1bn in 2025 of insured capital, solely in the retail segment.

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.



FINANCING THE TRANSITION: THE ISSUANCE OF GREEN BONDS AND THE GREEN, SOCIAL AND SUSTAINABILITY BOND FRAMEWORK

In line with its long-standing commitment to environmental and social matters, in June 2017 Intesa Sanpaolo was the first Italian bank to issue a Green bond connected with environmental sustainability projects.



* 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.
** This is the second green bond in JPY after a small private placement issued in March 2022.

The proceeds of any Intesa Sanpaolo Green Bond issued under the Green, Social and Sustainability Bond Framework will be exclusively allocated to Eligible Loans as defined within the list of Green Eligible Categories[67], that may be summarised as follows.

Green Eligible Categories

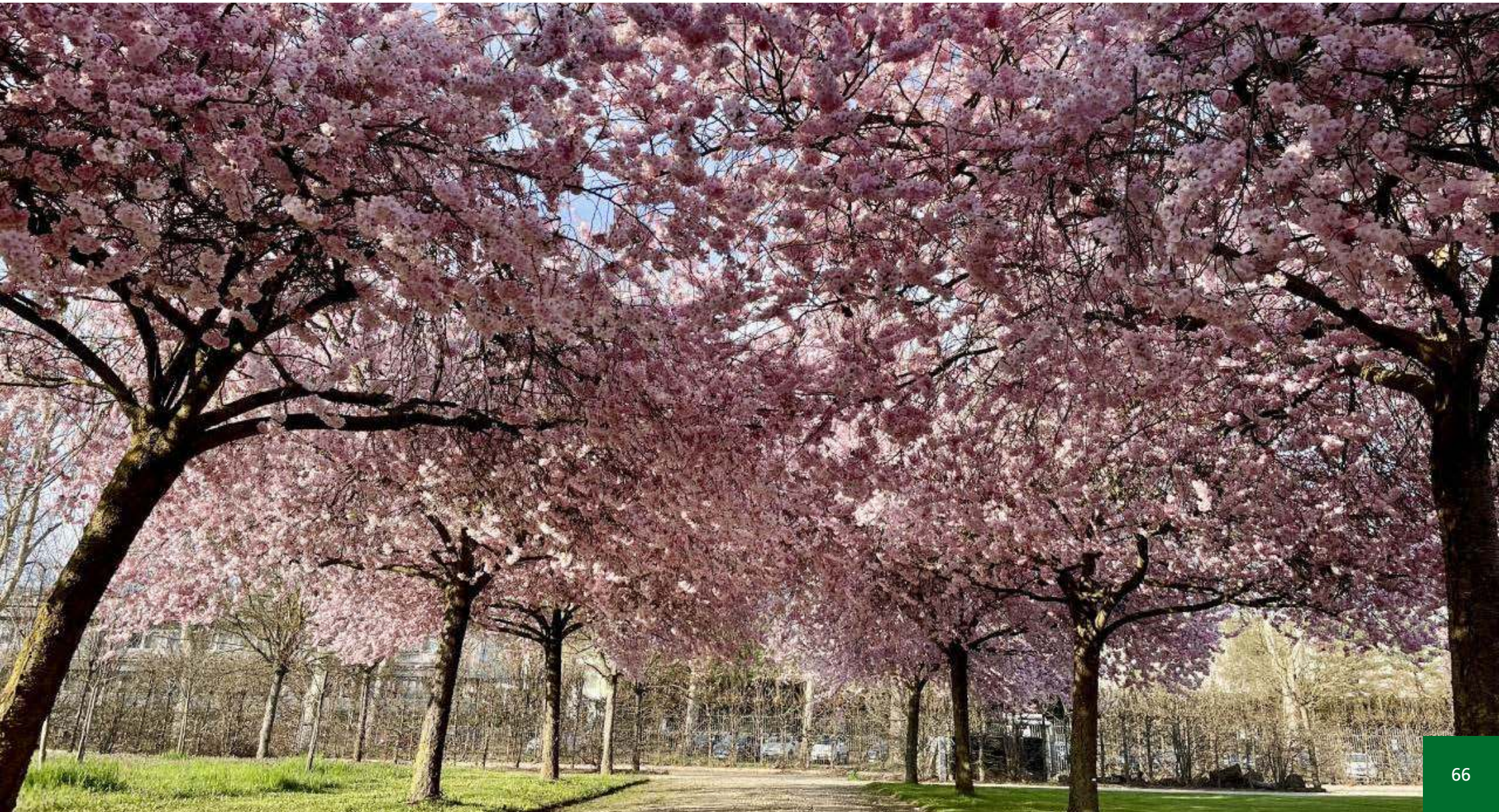
Renewable Energy	Energy Efficiency	Clean Transportation	Green Buildings	Environmentally Sustainable Management of Living Natural Resources and Land-use, Biodiversity	Circular Economy
Solar, Wind and Hydro-power where the facility: a) is a run-of-river plant and does not have an artificial reservoir or b) has power density 5W/m^2 or c) life cycle GHG emissions are lower than 100g CO_2e/kWh.	Energy storage from RES, smart grids, cogeneration of heat/cool and power if life-cycle GHG emissions lower than 100 g CO_2e per 1 kWh of energy output, energy efficient equipment and district heating/cooling.	Electric vehicles, Infrastructure enabling low carbon road and public transport, Urban and suburban road electric passenger transport, zero-emission heavy-duty and freight vehicles.	New and Existing buildings ■ For buildings built before 31st December 2020: • EPC A or buildings belonging to the Top 15% of the national building stock based on Primary Energy Demand (PED); • Buildings belonging to the Top 15% and having obtained a certain level of recognised environmental standards and certifications; ■ For buildings built after 1st January 2021: buildings where the PED is, or will be, at least 10% lower than the threshold set for the nearly zero-energy building (NZEB) requirements in national measures. **Refurbished buildings** with a minimum 30% energy saving improvement (or at least a two-step improvement in EPC label).	Sustainable agriculture (e.g., organic farming), sustainable forestry (afforestation, re-forestation, forest management and conservation based on certifications and standards) and carbon farming.	Various technologies, solutions, products and services aimed at increasing resource efficiency and enabling circular economy business models.
7 AFFORDABLE AND CLEAN ENERGY 13 CLIMATE ACTION	13 CLIMATE ACTION	11 SUSTAINABLE CITIES AND COMMUNITIES 13 CLIMATE ACTION	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 13 CLIMATE ACTION	13 CLIMATE ACTION 15 LIFE ON LAND	6 CLEAN WATER AND SANITATION 7 AFFORDABLE AND CLEAN ENERGY 8 DECENT WORK AND ECONOMIC GROWTH 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 10 REDUCED INEQUALITIES 12 RESPONSIBLE CONSUMPTION AND PRODUCTION 13 CLIMATE ACTION 15 LIFE ON LAND 17 PARTNERSHIPS FOR THE GOALS

67 Consult Green, Social and Sustainability Bond Framework for further details.

As of December 2025, Intesa Sanpaolo's outstanding Green Bonds amount to around €8.7bn. The Green Bond Ratio as at 31.12.2025 is equal to 18.4% approximately. The Green Bond Ratio is the percentage of total outstanding green bonds out of the total amount of wholesale benchmark bonds (Senior Preferred, Senior non-preferred and Covered Bonds)[68].

Please also refer to the chapter 'Metrics & Targets' for further information regarding 'Use of proceeds' of Intesa Sanpaolo Green Bonds.

68 Five-year moving average.

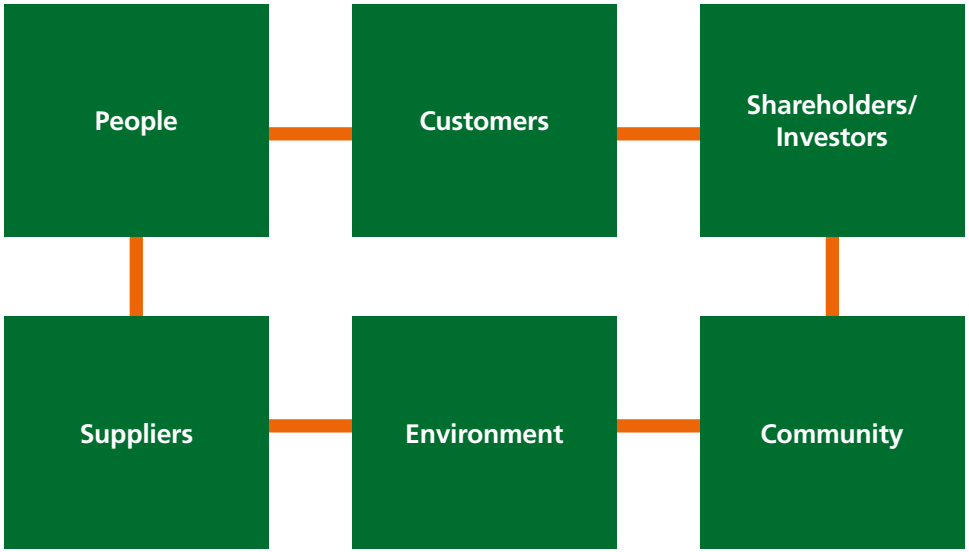


EXTERNAL ENGAGEMENT

ESG topics and climate change risks and opportunities are important for the entire value chain of financial institutions. For this reason, Intesa Sanpaolo is constantly engaging with different stakeholders: suppliers, investors and investees, authorities and trade associations.

Intesa Sanpaolo is committed to proactively engaging with peers in the financial industry to support the global transition to net zero. The Group's engagement with the industry is aimed at sharing best practices and expertise, as well as partnering to act cohesively on common challenges across the industry. Forums, events and consultations are key enablers of industry-wide coordination and sharing of best practices.

Stakeholders Dialogue in Intesa Sanpaolo



The Group recognises a stakeholder as being any internal or external party directly or indirectly involved in or impacted by the conduct of the company's business. Each stakeholder is involved in the achievement of the corporate mission in relation to the activities carried out by the Group. Stakeholders are therefore: customers, shareholders, the Group's people and all those who work with the Group, suppliers, the communities and the environment, with the latter also relating to the responsibility towards present and future generations.

Intesa Sanpaolo is committed to interacting with all its stakeholders in an ethical and transparent manner. The dialogue and engagement cover a large number of stakeholders and individuals, such as unions, works councils, academia, customers, suppliers, business partners, authorities, industry associations, non-governmental organisations and local communities, including vulnerable groups.

Intesa Sanpaolo recognises the value of engaging with public authorities and other stakeholders in relation to the development of various policy initiatives that impact its industry. In particular, in relation to Climate Change, as stated in Intesa Sanpaolo Code of Ethics, the Group is committed to actively participate in international initiatives (including regulators, trade associations, international bodies) to contribute to best practices in environmental responsibility, as well as their dissemination, in line with the spirit of the objectives of the Paris Agreement.

To this extent, the Group interacts primarily with decision makers in the countries in which it has significant operations and in particular in Italy, within the European Union, but also with extra EU international institutions, including Multilateral Development Banks and supra-national organisations and with foreign Countries representatives. These interactions are aimed at monitoring the developments of European and extra EU and supra-national banking, financial and insurance regulation and identifying the most affecting regulatory issues. The Bank also plays a proactive role in the relations with key stakeholders, informing the Group structures, carrying out analysis and participating in the discussions on regulatory proposals. Most resources are dedicated to advocacy activities within the EU through business associations and to direct dialogue with authorities and decision makers.

In addition, Intesa Sanpaolo participates in think tanks, at national and international level and engages with various Civil Society Organisations.

Investors and financial community

ESG and climate-related issues represent a strategic part of 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, CDP, Sustainalytics, MSCI, etc.) which confirmed Intesa Sanpaolo's positioning among ESG leading companies.

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.

Dialogue with Civil Society Organisation

Intesa Sanpaolo seeks open dialogue with all of its stakeholders, taking into consideration their views and concerns. Civil Society Organisations (CSOs) are among Intesa Sanpaolo audiences and partners as listening to their instances can provide a contribution to the development of the Group's environmental and social strategies, policies, or the implementation of investment projects and the promotion of public dialogue with governments and policy makers.

Civil society includes, among others, non-profit organisations, Non-governmental organisations (NGOs), policy and research think tanks, social movements, community-based organisations, trade associations and other socio-economic and labour-market actors.

Authorities & trade associations

Intesa Sanpaolo is actively engaged in contributing to the regulatory landscape it operates in and constantly monitors the regulatory framework on the topic of climate change at the international, European and national level through its Chief Institutional Affairs and External Communication Officer (CIAECO) Governance Area.

The information collected by the relevant structures within the CIAECO Governance Area is then disseminated across the Group through seminars, regulatory alerts, newsletters and other tools (such as the ESG regulatory vademecum).

At European level Intesa Sanpaolo is interacting with regulators, authorities, major European trade associations and other stakeholders to provide the Group's contributions to various sustainability initiatives. Intesa Sanpaolo, through the European Regulatory & Public Affairs (ERPA) function, based in Brussels, 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[69].

In addition to its external activities, ERPA is committed to raising awareness and providing training for business units impacted by major European legislative decisions, including: the changes to the reporting and due diligence requirements under the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD) provided by the so-called Omnibus I package; the disclosure of the issuer periodic post-issuance information and the templates for voluntary pre-issuance disclosures for bonds marketed as environmentally sustainable and of sustainability-linked bonds under the European Green Bonds Regulation (EU GBS); the legislative proposal for amending the EU Climate Law; the European carbon removal certification framework; the European Commission's Clean Industrial Deal with its implications to the circular economy; and the European Commission's roadmap towards nature credits.

The Group also continued its collaboration on Sustainable Finance with leading European trade associations, contributing to the work of the European Banking Federation (EBF), the Association for Financial Markets in Europe (AFME), European Issuers and the European Mortgage Federation - European Covered Bond Council (EMF-ECBC), which launched the Energy Efficient Mortgages Initiative (EEMI). EEMI, which has received funding from the European Commission for specific projects in recent years, aims to foster the market for energy efficiency mortgages development and consolidation and to empirically collect data on it. Intesa Sanpaolo joined in 2021 and takes part in the Working Groups of the EEMI. Furthermore, a representative from Intesa Sanpaolo was appointed Chairman of the ECBC for the 2024-2025 period.

69 Within the EU office in Brussel, a total of 3 full-time equivalents (FTE) are dedicated to these activities. All the related information, including the estimated annual costs attributable to activities covered by the Register and the amount of EU grants, are publicly reported by Intesa Sanpaolo through the EU Transparency Register.

On the topic of sustainable finance, Intesa Sanpaolo's collaboration with the Italian Banking Association (Associazione Bancaria Italiana - ABI) within specific working groups, such as BACC (Banche, ambiente e cambiamenti climatici - Banks, environment and climate change) and Investimenti sostenibili (Sustainable Investments) continued. 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. Intesa Sanpaolo also contributed to the work on the review of European Sustainability Reporting Standards (ESRS) promoted by EFRAG, as well as to the European Commission's consultation on the revision of the delegated acts of the EU Taxonomy Regulation.

International activities

Besides ad-hoc forums, Intesa Sanpaolo participates in a number of climate-related initiatives and partnerships demonstrating the Group's adhesion to the sector's collective effort to achieve Net Zero and other environmental goals. For a comprehensive list of Intesa Sanpaolo's initiatives and partnerships, please refer to the Strategy chapter, paragraph 'Commitments and partnerships as part of the Group's environmental strategy'.

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 ICC frameworks on sustainable trade finance, in line with the Sustainable Development Goals advocated by the UN at the 4th International Conference on Financing for Development (FfD4) held in Seville. BAFT is also participating with the Trade Finance Conference of Parties (TF COP) Sustainability Working Group to help drive this global industry-derived framework. The BAFT Master Trade Loan Agreement (MTLA) and Master Risk Participation Agreement, that address sustainability representations that may be applicable in a particular transaction, have been issued together with corresponding legal opinions on the provisions. These provisions can be incorporated as an optional addendum to the MTLA, representing an enabler to support sustainable business development.

Within this framework, the IMI Corporate & Investment Banking Division actively contributes to targeted international initiatives. In 2025, the Division participated in the following initiatives:

- **The RLCF Alliance (Renewable and Low-Carbon Fuels Value Chain Industrial Alliance):** promoted by DG Move of the European Commission, this broad initiative aims to ensure adequate access to renewable and low-carbon fuels for the aviation and maritime sectors. The IMI Corporate & Investment Banking Division was appointed as 'Chair' of the bankability working group from 2022 to 2024, in 2025 part of the recommendations (the 'intermediary' concept) to improve bankability became part of the STIP (Sustainable Transport Investment Plan published by the Commission);
- **Project Skypower – Breakthrough Energy – SystemIQ (Gates Foundation):** the global aviation industry has committed to cutting emissions significantly by 2050 – with e-SAF (Sustainable Aviation Fuel) forecast to be a critical lever for this, particularly for long-haul flight. By successfully scaling on e-SAF, Europe can increase its energy security, reducing reliance on imported fossil fuels and strengthen its climate leadership, leading the way for large-scale emissions reductions in the global aviation industry;
- **UK Government Infrastructure Strategy - London Conference:** the Division promoted in London the conference 'UK Government Infrastructure Strategy: Leveraging Public-Private Investment and Innovation for Sustainable Growth', which brought together institutions, businesses, and investors to discuss opportunities linked to the UK's new ten-year infrastructure plan. Key topics addressed included the new UK infrastructure strategy, enabling technologies to accelerate the energy transition, investment plans, and financial instruments supporting the modernisation of the energy system and the development of sustainable infrastructure.

ESG CRITERIA IN PROCUREMENT ACTIVITIES

Risks and opportunities arising from climate change influence Intesa Sanpaolo's supply chain strategy: purchasing and partnership decisions aim to minimise climate risks and maximise related opportunities over time. In line with the Group's Code of Ethics, Intesa Sanpaolo monitors suppliers' approaches to sustainability issues, including environmental aspects.

Supplier relationship management is primarily supported by the 'Suppliers' Gate' portal, which is used to manage supplier registrations and collect the necessary information, archive registration documents and their subsequent updates, support sourcing events (RFI, RFP, etc.), deliver information campaigns to suppliers, and archive executed contracts.

Subsequently, the qualification process and the monitoring of relevant counterparties is managed through the 'Qualification Portal 2.0', an application platform, which interfaces with the Supplier Gate portal, that processes various internal and external information sources within the Bank and calculates a qualification score (Global Score). As of the end of 2024, for suppliers that are also clients of Intesa Sanpaolo, the ESG score[70] calculated by the Bank is also included within the qualification processes, and contributes to determining the Global Score. The Global Score value determines a supplier's green, yellow or red status and may affect the eligibility to participate in sourcing events.

As part of the onboarding activities on the Suppliers' Gate, suppliers are required to complete a series of questionnaires including the ESG questionnaire and the Reputational Risks questionnaire. The ESG questionnaire allows the understanding of suppliers' business ethics, respect for human and labour rights, environment and climate change (15 out of 38 questions are related to environmental topics, with an overall weight of 37%) and maps environmental certifications possession (such as ISO:14001, ISO:14064, ISO:50001, ISO:20400). In case of possession, environmental certifications must be uploaded on the Portal and kept updated. Control, monitoring and reminder activities are carried out if documents are not updated. Over the past two years, awareness campaigns have also been conducted with suppliers to complete their mapping from an ESG perspective. Starting in 2024, for each tender launched via the Supplier Gate, suppliers are required to update their ESG and Reputational Risks questionnaire responses if they have not already done so.

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. 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 set in the 2022-2025 Business Plan. The disclosure of Intesa Sanpaolo's sustainability principles to suppliers takes place during the registration on Suppliers' Gate, when suppliers are required to review and accept various company documents, including the Intesa Sanpaolo Code of Ethics, the General Terms and Conditions of Supply in force, in order to be registered and operate with the Group. Upon the assignment of each new engagement, the General Terms and Conditions of Supply are resubmitted for the suppliers' signature. These expressly require suppliers to comply with the key principles of the Code of Ethics in performing the assigned tasks, also ensuring compliance by their representatives, employees, associates and subcontractors.

In 2025, a Supplier Code of Conduct was also drafted and submitted for formal approval to the Parent Company's structures, with the aim of promoting and sharing sustainable and responsible practices across the entire supply chain, ensuring consistency with and commitment to the Group's ethical, environmental, and social values, and fostering supplier relationships based on trust and transparency.

Lastly, with regard to the management of environmental aspects, the Group has also adopted the 'Rules on Green Banking Procurement', which are part of the initiatives dedicated to environmental protection. These rules aim to promote a responsible approach in the sourcing and use of goods and services, giving preference to those that comply with specific environmental criteria throughout all phases of the procurement process. The objective is to identify the best design solutions, products or services with the lowest possible environmental impact throughout their life cycle, taking into account market availability. Starting from 2025, for competitive tenders involving so-called 'green' product categories, defined by the rules, a pilot phase was launched with selected Real Estate Management structures of the Bank. The pilot involves sharing with the selected structures certain significant suppliers' responses to the ESG questionnaire, assigning them a percentage weighting. This outcome represents a preferential criterion in the final technical evaluation.

70 For further details please refer to the 'Sustainable profile of the counterparty – ESG score'.

RISK MANAGEMENT

RISK MANAGEMENT: INTRODUCTION

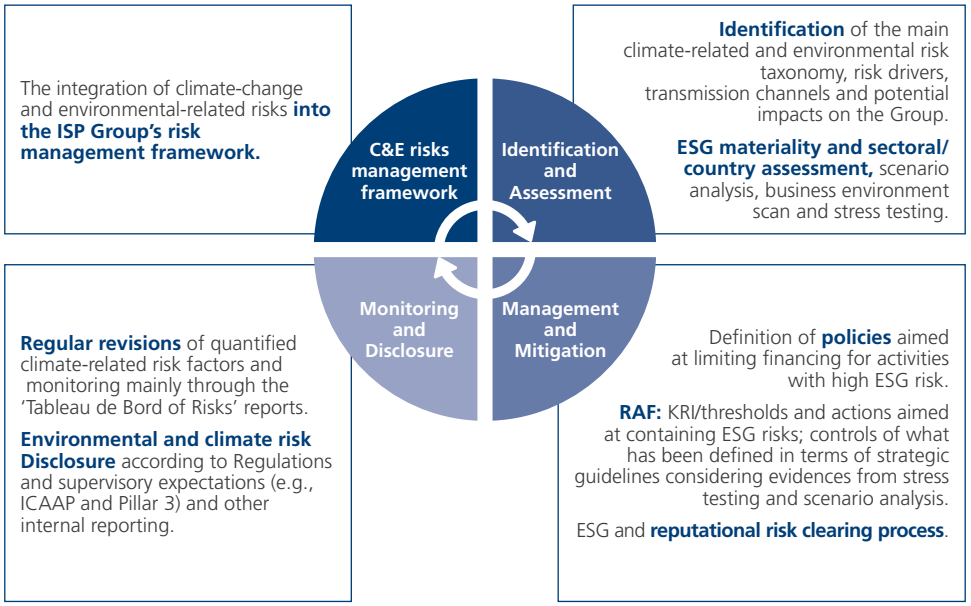
The identification of risks is carried out by the Group on an ongoing basis given the continuously changing internal and external landscape in order to ensure the safeguard of adequacy and 'long-term viability'.

The Group's risk management process consists of the following steps:

- identification;
- measurement and assessment (methods and tools);
- monitoring and control;
- mitigation;
- disclosure.

This process is also applied to the management of ESG risk, defined in the 'Group guidelines for the governance of Environmental, Social and Governance (ESG) risks', and in this area more specifically to the **climate and environmental (C&E) risks**. Hence, Intesa Sanpaolo's integrated approach to managing C&E risks could be represented into four parts:

- integration of C&E risks within the risk management framework;
- identification and assessment;
- management and mitigation;
- monitoring and disclosure.



CLIMATE AND ENVIRONMENTAL RISKS INTEGRATION WITHIN THE RISK MANAGEMENT FRAMEWORK

Intesa Sanpaolo is implementing its climate and environmental framework according to the principles defined by international best practices and regulatory developments at international level.

Intesa Sanpaolo believes that C&E risks as well as social and governance risks are cross-cutting drivers of traditional risk families (i.e., credit risk, operational risk, reputational risk, market risk and liquidity risk).

In fact, as specifically set out in the taxonomy included in the Group's Integrated Internal Control System regulation, the following risks are liable to be impacted by ESG risks. They are defined as 'risks deriving from potential negative impacts, direct or indirect, on the environment, people and communities and more generally on all stakeholders, or deriving from the governance of the company'.

Impacts on financial and non-financial traditional risks (illustrative):

	Physical		Transition
	Climate	**Environmental**	**Climate/Environmental**
	• Extreme weather events • Chronic weather conditions	• Decline of ecosystem services (e.g., provisions, soil quality, etc.)	• Economic policies and regulation • Technology • Market confidence • Preferences and expectations of consumers and investors
Credit risks	Credit risks increase if climate-related risks and environmental risks reduce borrowers' ability to repay and service debt (income effect) or banks' ability to fully recover the value of a loan in the event of default (wealth effect). The estimates of the PD (probability of default) and LGD (Loss Given Default) of exposures in sectors or geographical areas vulnerable to physical risks may be affected by the physical events to which the counterparties' assets (with consequent repercussions on financials) or collateral as a guarantee for the loans are subject.		Substantial adaptation costs and lower corporate profitability may lead to a higher PD as well as lower collateral values or less efficient recovery actions (LGD). For example energy efficiency standards will lead to high adaptation costs with possible tensions in profitability indicators and a consequent increase in PD; on the other hand, the properties that do not comply with energy standards will have a lower value with a consequent impact on the value of collateral.
Market risks	Reduction in financial asset values, including the potential to trigger large, sudden and negative price adjustments where climate-related and environmental risk is not yet incorporated into prices. Climate-related and environmental risk could also lead to a breakdown in correlations between assets or a change in market liquidity for particular assets, undermining risk management assumptions. Severe physical events could cause changes in market expectations and result in a sudden repricing of risk, higher volatility and losses on asset values in some markets.		Transition risk factors could even generate sudden impacts on the prices of financial instruments, homogeneous asset classes or market sectors, as well as significant increases in the volatility associated with these instruments.
Liquidity risks	Climate and environmental risks could have direct impacts in the determination of cash outflows (such as, for example, withdrawals of money from accounts by customers to finance damages) or indirect impacts, for example following potential tensions on financial markets. Banks' access to stable sources of funding could be reduced as market conditions change.		Transition risk factors could negatively affect, directly and indirectly, the expected cash flows, or could affect the available liquidity reserves, making some assets less liquid or reducing their value, negatively affecting the bank's overall liquidity position.
Reputational risks	Extreme weather or ecosystem integrity related events could result in interruptions to the Group's operations, with possible repercussions in terms of image. Reputational risk factors could occur if the Group does not adhere to or does not comply with the sustainability and carbon neutrality targets defined for its operations; furthermore, increasing reputational risks to financial institutions may occur based on changing market or consumer sentiment.		The negative perception or deterioration of the Group's image because customer, counterparty, investor or Supervisory Authorities expectations on the management of climate and environmental risks are not met, can derive for example from: • failure to comply with international standards/objectives to which the Group has adhered; • customer complaints relating to climate and environmental issues; • media campaigns or NGO initiatives related to the financing of controversial activities from an environmental point of view.
Non-financial risks – Operational risks	The Group's operations could suffer interruptions due to material damage to properties following extreme weather or ecosystem integrity events. Increasing legal and regulatory compliance costs associated with nature-sensitive investments and businesses.		The evolution of consumers' awareness of climate issues may lead to legal liability risks for the Group due to issues caused by the financing of environmentally controversial activities.

The potential impacts of C&E risks, as well as social and governance risks, are assessed through the risk management framework in the following manner:

- the development of the internal **risk taxonomy** and the identification and analysis of the relevant **transmission channels**;
- **Scenario Analysis** assessments and stress testing processes, aimed at evaluating the impacts of climate risks in the short, medium and long-term;
- the **Climate/ESG Materiality Assessment** aimed at identifying the Bank's assets most exposed to C&E risks based on qualitative and quantitative approaches;
- the definition of specific **Key Risk Indicators** (KRI) and limits as well as exclusions in sectors most exposed to C&E, social and governance risks;
- the integration of a specific ESG risk assessment within the credit granting processes and definition of **credit strategies** driven by ESG risks and opportunities;
- setting specific processes to **integrate** ESG risk factors within the management of **traditional risk families**;
- integration of a specific ESG risk assessment within the **investment decision process** as far as **financial portfolios** are concerned;
- both internal and external **reporting** activities aimed at informing and disclosing the results of the measurement and monitoring activities to the different stakeholders.

CLIMATE AND ENVIRONMENTAL RISKS: IDENTIFICATION AND ASSESSMENT

In order to define the appropriate processes for managing and mitigating C&E risks, the Group adopts common definitions of risk drivers and transmission channels (risk taxonomy) and defines the appropriate models to measure the effects of the aforementioned drivers on the traditional risk families of the Group (Credit, Liquidity, Market, Operational risks). The following paragraphs detail the definitions currently used by Intesa Sanpaolo within the C&E risk management framework and the main methodologies and processes undertaken to assess materiality and potential impacts of these risks for the Group.

CLIMATE AND ENVIRONMENTAL RISK TAXONOMY

According to the internal risk taxonomy, C&E risks can be divided into the traditional physical and transition risk categories as described in the figure below.

Physical and transition risk drivers affect economic activities, which in turn impact the financial system. This impact can occur directly, through for example lower corporate profitability or the devaluation of assets, or indirectly, through macro-financial changes.

C&E risk drivers

Transition Risk

Risks related to the transition to a lower-carbon economy:

- Policy and regulation: political actions which will encourage a transition to a green economy
- Technology development
- Consumer preferences: changes in demand and supply of raw materials, products and services

Physical Risk

Risks related to the physical impacts of climate change

Acute Risks

Risks **arising from extreme events,** such as droughts, floods and storms

Chronic Risks

Risks **arising from progressive shifts,** such as increasing temperatures and water stress

Nature - Related Risk

Risks result from:

- the degradation of nature, including its biodiversity, and the loss of ecosystem services that flow from it
- the misalignment of economic actors with actions aimed at reducing negative impacts on nature

Transmission Channels

Macroeconomic

Transition, Physical and Nature-related risk drivers impact on an economy overall and sovereigns in general, as well as macroeconomic variables

- Commodities Prices
- Corporates and Households
- Sovereigns
- Interest rate levels
- Governments Bonds

Microeconomic

Are those channels that allow physical risk drivers to impact banks' financial risks either directly or indirectly, for example through their counterparties or financial assets

- Drop in labor productivity
- Increasing costs
- Reduction in revenues
- Worsening collateral value
- …

Potential Impacts

Credit Risk:

- NFCs Unsecured/Secured Exposures
- Retail Unsecured/Secured Exposures
- Governments Exposures
- …

Market Risk:

- Government Securities
- Corporate Securities
- Financial Securities
- …

Liquidity Risk:

- HQLA Assets
- Cash Inflows
- Cash Outflows
- …

Operational Risk:

- Bank Branches
- Production Sites
- Service Centers
- …

- Banking Book Financial Risk
- Reputational Risk
- Financial Reporting Risk
- Strategic Risk

The likelihood and size of the impact of climate and environmental risk drivers can be affected by a number of additional variables. These include: the geographic location of the Bank, asset or exposure, interactions and interdependencies between transmission channels and climate risk drivers that can amplify impacts, and mitigants that reduce or offset impacts.

All of the above holds also as concerns the broader climate-related and environmental risks, extending for example to nature-related risk categories and transmission channels, where, as defined by the latest evolution of literature and studies on the topic, the main sources of risks for the counterparties of Intesa Sanpaolo and, in turn, for the Group itself stem from impacts on nature and dependencies from nature.

As part of its ongoing commitment to continuously improving the management of ESG risks, the Group has developed a strengthened methodology to measure its exposure[1] to so-called 'other environmental' risks described in the next focus 'Nature-Related Risks methodology'.

Focus:

Nature-Related Risks Methodology and Results

Within its commitment to continuously improve the management of ESG risks, the Group, in the last years has developed and implemented a strengthened methodology for measuring its exposure to 'other environmental' risks (i.e., financial risks deriving from the impact on biodiversity or from dependencies related to natural capital or ecosystem services, as detailed below). A preliminary assessment exercise has been carried out in 2023 and later has become part of the overall risk management measuring and monitoring framework.

The methodology is focused on Non-Financial Corporations (NFC) counterparties and takes into account the main risk drivers related to environmental risks, in terms of:

- impacts on nature: changes in nature caused by business activity which may involve potential impacts on social and economic functions;
- dependency on nature: aspects of ecosystem services that an organisation, or other actors, relies on to function (e.g., water availability).

The methodology follows the best practice and guidelines provided by the Taskforce on Nature-related Financial Disclosures (TNFD) and the 'LEAP' (Locate, Evaluate, Assess, Prepare) process, as recommended by the TNFD and, in particular, it assesses the credit portfolio vulnerability exposure in relation to environmental risks. The different phases of the LEAP process are described below:

Locate	Evaluate	Assess	Prepare
your interface with nature	your dependencies and impacts	your risk and opportunities	to respond to nature-related risks

Locate

In the 'Locate' phase, headquarters and local production units of the counterparties are identified, setting the stage for analysing the interactions between industries and their surrounding nature (direct operations). Access to external databases for mapping ecosystems provides the basis for analysing ecosystem services and pressures on biodiversity.

Evaluate

Industry-specific impact/dependency scores are applied using sector-level materiality (top-down approach). Impacts and dependencies (for direct local operations of the counterparties) are evaluated applying a bottom-up approach taking into account the relevance of the location- specific natural resource status and the materiality of the industry-specific dependency or impact.

Relevance and materiality are assessed with sectoral adjustments through input-output matrices for value chain risk assessment.

For each company (at local unit level) various sectoral and territorial scores are estimated and normalised in order to enable comparison between sectors and geographies. These scores are estimated by accounting for potential future states of the natural capital in the short, medium, and long-term in two opposite scenarios:

1. a scenario that foresees a global increase in ecosystems integrity and where nature-related transition risks rise;
2. a scenario where ecosystem integrity declines and nature-related physical risks increase.

1 The analyses of Nature-Related Risks are conducted by considering the exposures within each sector in the credit portfolios of IMI Corporate & Investment Banking (IMI CIB) and Banca dei Territori (BdT) divisions.

The forward-looking analysis incorporates state-of-the-art future projections related to both terrestrial and water biomes.

Within the analysis the most relevant biodiversity impacts categories and dependencies are considered. In particular:

- impacts: indicators related to biodiversity impact (e.g., air pollution, water pollution) are considered;
- dependencies: provisioning services or direct physical input (e.g., crop and timber provisioning).

Impacts		Dependencies	
Air Pollution	Soil Pollution	Crop Provisioning	Timber Provisioning
High Risk commodity	Water Use/Provisioning		
Water Pollution	Ecosystem Integrity and Land use		

Several measures have been considered in order to create the single indicators, 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.

Sectoral materiality	Territorial relevance
Top-down	**Bottom-up integration**
The **materiality** of the impact or dependency is assessed trough the analysis of external database, taking into account the sector's specificity.	The **relevance of geographic location** is assessed to provide an estimate of the condition and capacity of the ecosystems in which business operations take place.

Source: adapted from SBTN (Science Based Targets Network).

Assess

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 with each counterparty. Furthermore, the analysis has been evolved to encompass evaluation on quantitative credit risk metrics (i.e., PD shifts estimation) on the most relevant NRR Risk Driver Indicators achieved through the development of specific functions able to project and estimate impacts on the counterparties P&L and balance sheet items.

Prepare

The evaluations have now become part of the overall risk measuring and monitoring framework within the climate and environmental risk management process and are integral part of the internal and external reporting activities.

2025 analysis results

The results of the analysis based on the methodology described above[2] are here presented.

The analysis shows that nature-related risk drivers for Non-Financial Corporations (NFCs) are primarily relevant over a mid to long-term time horizon. The main nature-related risk drivers affecting the most impacted sub-sectors within the portfolio are described below.

With regard to the **BdT portfolio**, Water Stress (related to the Water Provisioning driver) and Crop Provisioning are the risk drivers most relevant for the Agriculture sub-sector, whereas Air Pollution (non-GHG-related) shows medium relevance for Cement (within the Building, Construction and Real Estate sector) and Water Transport (within the Infrastructure and Transport sector).

For the **IMI CIB portfolio**, Water Stress (related to the Water Provisioning driver) shows medium relevance, particularly for the Mining and Iron & Steel sub-sectors. Another relevant risk driver for this portfolio is Air Pollution (non-GHG-related), which shows medium relevance for Cement, Iron & Steel and Mining.

2 This methodology is an evolving framework, continuously refined through best practices and based on the emerging standards.

SCENARIO ANALYSIS AND STRESS TEST

Scenario analysis represents a fundamental element to evaluate risks associated with climate change, taking also into consideration implications of different time-horizons. In general, the Climate Scenario Analysis is used to explore potential portfolio vulnerabilities, where deemed more material, and in the context of regulatory or internal stress testing processes.

The scenario analysis is performed for different risk categories while ensuring coherence among the underlying assumptions of the scenarios used.

Scenarios

As per best international practices, the Network for Greening the Financial System ('NGFS') Phase V scenarios have been taken into consideration within the scenario analysis and stress test.

More specifically, also 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'):** the scenario assumes that climate policies are introduced early and gradually become more stringent. The Net Zero 2050 scenario foresees a limit to global warming to 1.5°C through stringent climate policies and innovation, reaching global Net Zero CO_2 emissions around 2050. Some jurisdictions reach Net Zero for all GHGs.
- **Disorderly transition ('Delayed Transition'):** the scenario assumes annual emissions do not decrease until 2030. Strong policies are needed to limit warming to below 2°C. Negative emissions are limited.
- **Hot House World ('Current Policies'):** the scenario assumes that some climate policies are being implemented in some jurisdictions, but that globally efforts are insufficient to halt significant global warming. In particular, the Current Policies scenario assumes that only currently implemented policies are preserved, leading to high physical risks. Emissions grow until 2080 leading to about 3 °C of warming and severe physical risks.
- **Too little too late ('Fragmented World'):** the scenario assumes delayed and divergent climate policy ambition globally to limit warming to below 2.5°C, leading to high physical and transition risks. Countries with Net Zero targets achieve these only partially (80% of the targets), while the other countries follow current policies.

Both Orderly and Disorderly transition scenarios, as declared within the NGFS technical documentation, are within the range of the low temperature scenario (Representative Concentration Pathway RCP 2.6), whereas the Current policies scenario is close to the high temperature scenario (RCP 6.0) by the end of the century.

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).

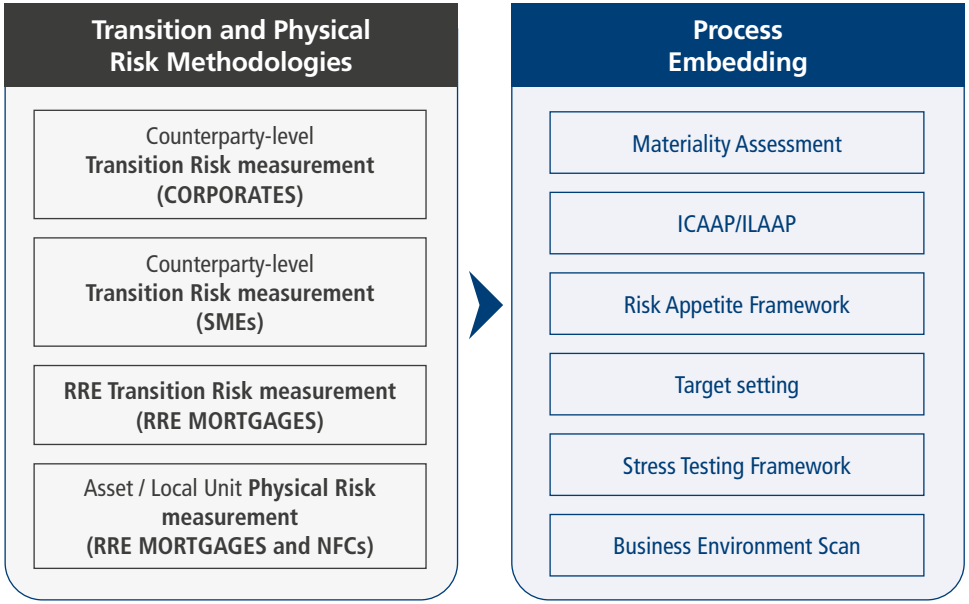
Credit Risk

Measurement framework

To conduct scenario analysis activity on the credit portfolio, Intesa Sanpaolo adopted an approach that integrates different components. The overall picture of the measurement framework is represented in the figure below.

A general overview of the measurement approaches is summarised in the figure below. The climate risk drivers and the transmission channels described in the previous sections are modelled in order to estimate the impact of the given scenarios on the main risk measure (i.e., Probability of Default of the counterparties).

For Non-Financial Corporations (NFCs) exposures, which include also SMEs and corporate exposures, the effects of the scenarios are reflected by projecting balance sheet figures at single counterparty level while for the residential real estate portfolio (RRE), the financial impact is estimated on immovable properties considering the impact of transition scenarios and physical hazards. The outcomes are embedded in various processes that are described in this and the following chapter.



	NFCs		RRE	
Key Risk Indicator	IMPACT ON BALANCE SHEET ITEMS		IMPACT ON ASSET VALUE	
	Transition Risk	**Physical Risk**	**Transition Risk**	**Physical Risk**
Transmission channels	• Policies & Regulations • Technology • Market Sentiment & Reputation	• Flood • Wildfire • Drought • Heatwave • Coldwave • Landslide • Wind gust	• Policies & Regulations • Technology	• Flood • Wildfire • Landslide • Wind gust
Vulnerability Threshold	• Balance Sheet Simulation • Rating projections	• Damage functions application • Balance Sheet Simulation • Rating projections	• Decarbonisation Path and retrofitting costs • Market Value Calculation	• Damage functions application • Market Value Calculation
Time Horizon	Short Term (2028) - Medium Term (2031) - Long Term (2050)			

Market Risk

Measurement framework

To conduct scenario analysis for transition and physical risks on the securities portfolio measured at fair value, Intesa Sanpaolo adopted an approach focused on the following:

- all financial instruments, including derivatives (transition risk);
- a specific focus on Corporate & Financial issuers securities portfolio (both for transition and physical risks).

With the aim of providing a comprehensive view of Intesa Sanpaolo's main vulnerabilities to climate risk, the scenario and stress testing analyses have been carried out taking into account different perspectives:

- a long-term perspective for all financial instruments (including derivatives);
- a specific focus on short, medium and long-term perspective for the Corporate & Financial issuers securities portfolio.

The models used rely on the following methodological framework to assess the impact of the NGFS scenarios in scope of the analysis and in-house scenarios:

- all financial instruments (including derivatives): stress impact computed applying the in-house developed market risk scenarios that covers all relevant risk factors;
- Corporate & Financial issuers exposures: Climate VaR ('value-at-risk') model provided by a vendor that calculate impact of climate change on current enterprise value of companies at single issuer and portfolio level based on forward-looking cost and benefit analysis.

Liquidity Risk

Measurement framework

In assessing the various scenarios, including stressed ones, on incoming and outgoing cash flows and the quantitative and qualitative adequacy of liquidity reserves, particular attention is paid to analysing the impact of C&E risk factors that could compromise liquidity positions on a forward-looking basis: this analysis is incorporated in the annual documentation presented within the approval process of the 'Internal Liquidity Adequacy Assessment Process' (ILAAP) over a time-horizon of up to 4 years.

Operational Risk

Measurement framework

The potential impact of ESG Risks with regards to effects on Operational Risk, is assessed annually through a Scenario Analysis undertaken in the context of a 'Self-Diagnosis' process. The analysis leverages on scenarios referring to:

- Physical Risk (Climate Change Risk): the main source of risk has been identified in floods that may involve data centers; the location of properties does not seem to expose the Group to very significant risks and, therefore, the relevance of this kind of scenarios has been deemed relatively small compared to the total potential estimated losses; Furthermore, during the Self-Diagnosis process, the impacts for the Group of extreme climate events that affect essential third parties by compromising critical outsourced services, are assessed through dedicated scenarios;
- the risk of ESG-related litigation (i.e., lawsuits related to investments in products with an adverse environmental impact, financing high-polluting companies, social or environmental disputes linked to business activities of the Group): a specific scenario pertinent to the risk of losses due to a violation of fiduciary obligations with clients or with Financial Markets regarding ESG issues is assessed, with a forward looking perspective, and includes three cases:
  - violation of the current ESG regulatory framework - consisting of a complex set of binding and non-binding measures and regulations issued at international, EU and national level;
  - non-fulfillment of contractual and possible non-contractual liabilities (e.g., Bank/customer for own or third-party products; Bank/shareholder; Bank/subscriber of own Green Bond issues; Bank for roles assumed in customer issues; Bank for financing or related activities);
  - greenwashing and violation of ESG disclosure obligations - disputes of a civil and/or administrative nature deriving from false, misleading, incomplete or inconsistent communications from the Bank in which a product or an activity is declared as green or sustainable, or from the violation of ESG disclosure obligations.

The contribution to the total estimated losses and Value-at-Risk is estimated taking into account also the trends in the ESG litigations reported by banking/financial sector, both domestic and international.

The operational events taxonomy used within Loss Data Collection (process aimed at detecting historical operational events affecting the Group) includes categories specifically dedicated to natural disasters that can be

related to Climate Change risk (e.g., floods, heat waves, rains, storms, etc.) and a comprehensive classification of all Environmental related litigations.

CLIMATE/ESG MATERIALITY ASSESSMENT

According to the European Central Bank (ECB) expectations on climate-related risks management, Intesa Sanpaolo has developed and progressively enriched the Climate/ESG Materiality Assessment analysis. In this report, the results of this assessment are explored more specifically with reference to climate and environmental (C&E) risks, in order to identify the Bank's assets most exposed to environmental and climate risks based on qualitative and quantitative approaches.

The materiality assessment aims to provide well-informed decisions on ESG risks within main business processes:

- the outcomes of the materiality assessment constitute one of the inputs for the classifications of sectors into the ESG Sectoral Color Coding;
- according to this ESG Sectoral Color Coding, credit operations are then redirected towards the ESG risk assessment process;
- within the Group's Risk Appetite Framework specific sectoral limits have been implemented considering the aforementioned outcomes, as tolerance thresholds and risk limits.

The Climate/ESG Materiality Assessment has been developed across all risk families considering various regulatory segments and works with different levels of granularity, depending on specificities of the portfolios considered and the lending processes to be informed. Its quantitative metrics are also used by the Bank within the Business Environment Scan (BES) analysis (please see the 'Business Environment Scan (BES) overview and strategic insights' paragraph in the 'Strategy' chapter).

The Climate/ESG Materiality Assessment analysis here described contributes to the definition of financial materiality for the Environmental component which, together with the impact materiality, forms the basis of the double materiality analysis described in the Consolidated Sustainability Statement.

Focus on Credit risk

The materiality assessment of the non-financial corporate credit portfolio relies on the 'ESG sectoral assessment approach'. This approach provides a prudent estimation of the NFCs susceptibility to a set of risk drivers, including, among others, physical, transition and environmental risks. This approach combines the analysis of qualitative external sources (qualitative top-down element) with the granular and forward-looking results of the scenario analysis (quantitative bottom-up element).

The top-down element analyses economic sectors' vulnerability to C&E risks at large drawing on several external sources, thus leveraging on multiple perspectives in reaching a conversant evaluation. The bottom-up element leverages on climate stressed counterparty-level data, providing a more granular and forward-looking insight into the underlying vulnerabilities of the NFC portfolio, as explained in the previous paragraphs. Together, these approaches help identify and qualify the risks economic sectors are exposed to.

The figure below shows sector-level exposures and associated level of physical, transition and environmental risk. While the physical and transition risk scores capture only the sectors' vulnerability to climate-related risks, the environmental risk score, in addition to the vulnerability of sectors to climate-related risks, leverages on the outcomes of the nature-related risks analysis, where different environmental dimensions have been considered, such as air pollution, water stress, and crop and timber provisioning.

Sector	PH	TR	E[3]	% in total NFC exposures
Infrastructure and Transport	Medium	Medium	Medium	14.4%
Distribution	Medium	Moderately Low	Medium	14.3%
Manufacturing	Medium	Medium	Medium	13.9%
Building, Construction and Real Estate	Medium	Medium	Medium	9.2%
Technology and Telecommunications	Medium	Moderately Low	Medium	7.8%
Power and Utilities	Medium	Medium	Medium	7.5%
Agriculture and Food	Moderately High	Medium	Moderately High	6.6%
Financial and Public Services	Moderately Low	Moderately Low	Moderately Low	5.4%
Oil and Gas	Medium	Moderately High	Moderately High	4.3%
Mining and Metals	Medium	Medium	Moderately High	2.4%
Automotive	Medium	Moderately High	Moderately High	1.5%
Aerospace & Defence	Moderately Low	Medium	Medium	1.2%
Other	Medium	Medium	Medium	11.4%

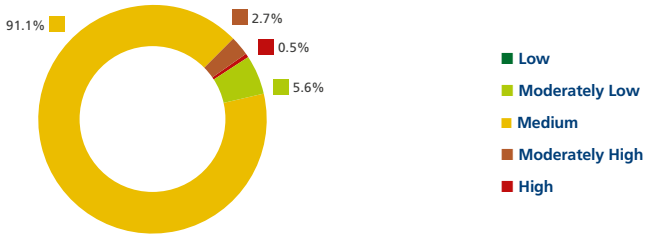
Low | Moderately Low | Medium | Moderately High | High

3 It includes climate and nature-related risk indicators.

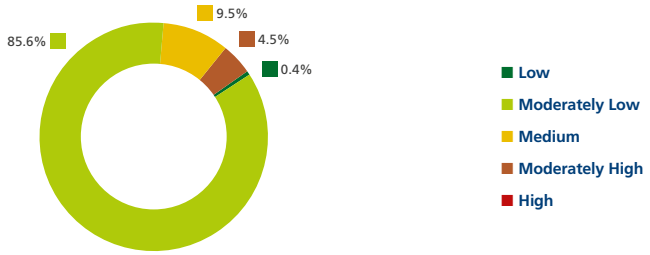
The materiality assessment of the sovereign lending portfolio relies both on the 'ESG sectoral assessment' and the 'ESG Sovereign Integration' approaches to capture the materiality of climate risks in the context of the sovereign lending portfolio. This assessment relies on external sources to provide an estimation of countries' exposure to physical and transition risk.

The figure below shows the sovereign lending portfolio exposures (at country-level) respectively to physical and transition risk.

Sovereign lending - Physical risk:



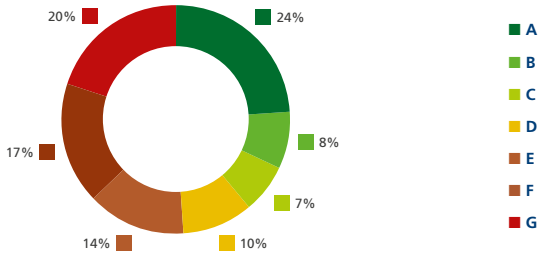
Sovereign lending - Transition risk:



The materiality assessment of the Residential Real Estate Portfolio[4] relies on climate risk models designed to evaluate the mortgage properties' vulnerabilities to risk associated with climate change scenarios and physical hazards in the context of transition and physical climate risk assessments.

In order to represent the transition risk, the graphic below shows the distribution of the exposures collateralised by residential immovable properties based on the label of the energy performance certificate (EPC). Only those properties for which an EPC is available are included in the representation.

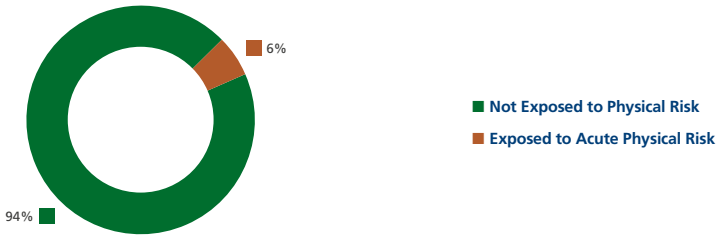
Mortgages – Transition risk (by energy performance certificate EPC):



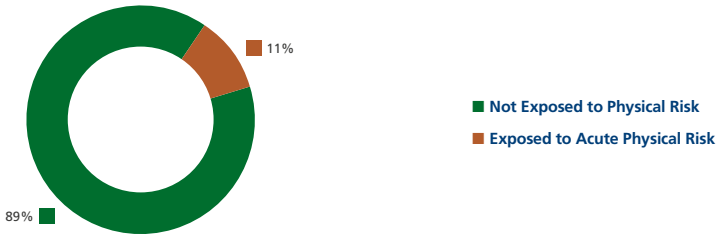
To represent physical risk, the graph below shows the percentage of loans collateralised by immovable properties that are exposed to acute climate-related risk compared to the total mortgage portfolio. In order to provide a more detailed overview, the presentation is broken down by the geographical area in which the collateralised property is located (Italy and EU[5]).

4 The following representations of the transition and physical risk of mortgages refers, respectively, to the perimeter of Templates 2 and 5 of Section 20 – Disclosure on environmental, social and governance risks of the Pillar 3.
5 Countries where the Group's main European subsidiaries are located.

Mortgages – Physical risk (EU - excluding Italy):



Mortgages – Physical risk (Italy):



Focus on Market risk

Also in 2025, the Climate/ESG materiality assessment methodology applied to the NFC credit portfolio was also applied to the assessment of the investment portfolios.

Regarding the materiality assessment process, in terms of perimeter of exposures, the assessment also includes Equity Instruments held on Trading Book, Alternative Investments (Private Equity, Private Debt and Hedge Funds) and OTC derivatives perimeters.

In particular, the exposures are evaluated using the following approaches:

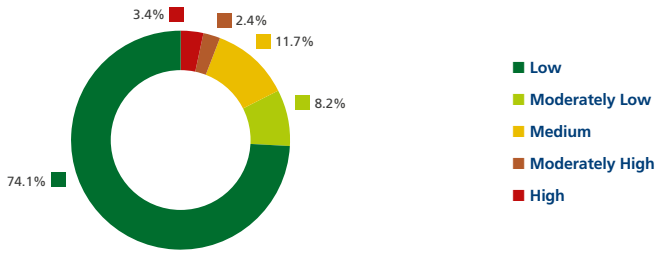
- the 'ESG sectoral assessment approach' (also applied for credit materiality assessment);
- the 'ESG Sovereign integration approach', aimed at evaluating countries' ESG performance considering KPIs drawn from multiple external sources: the approach considers factors such as the SDGs scores, GHG intensity, etc. to capture Climate & ESG risk of sovereign issuers;
- the 'compliance to the UN PRI principles' as a driver to assess Alternative Investments.

The figure below shows Corporate & Financial bond portfolio exposures and the associated level of physical, transition and environmental risk, based on the 'ESG sectoral assessment approach' outcomes.

Sector	PH	TR	E	% in total exposures
Financial and Public Services				36%
Power and Utilities				11%
Technology and Telecommunications				10%
Infrastructure and Transport				10%
Manufacturing				8%
Oil and Gas				5%
Automotive				5%
Agriculture and Food				5%
Building, Construction and Real Estate				3%
Distribution				2%
Mining and Metals				0%
Aerospace & Defence				0%
Other				5%

Low | Moderately Low | Medium | Moderately High | High

The figure below shows Sovereign bond portfolio exposures and the associated synthetic assessment of physical, transition and environmental risk, based on the 'ESG Sovereign integration approach'.



The results show limited exposures to high ESG risk sectors and countries.

Focus on Liquidity risk

The liquidity risk materiality assessment process aims to investigate the effects that relevant C&E risks may have on net cash outflows or available liquidity reserves of Intesa Sanpaolo. As per general consensus in the banking industry, the link between ESG risks and liquidity is mainly of an indirect nature and especially with potentially longer-term manifestations. Nevertheless, these risks and their transmission channels should not be overlooked, but appropriately integrated in the assessment of the potential effects on the current and prospective liquidity position of the Group.

To this end, after the prior identification of the C&E risks factors that could negatively affect the Group's liquidity positions, specific analyses and monitoring of the exposures are carried out for the climate-related risk materiality assessment, maintaining close connection with the methodologies adopted by credit and market risk management.

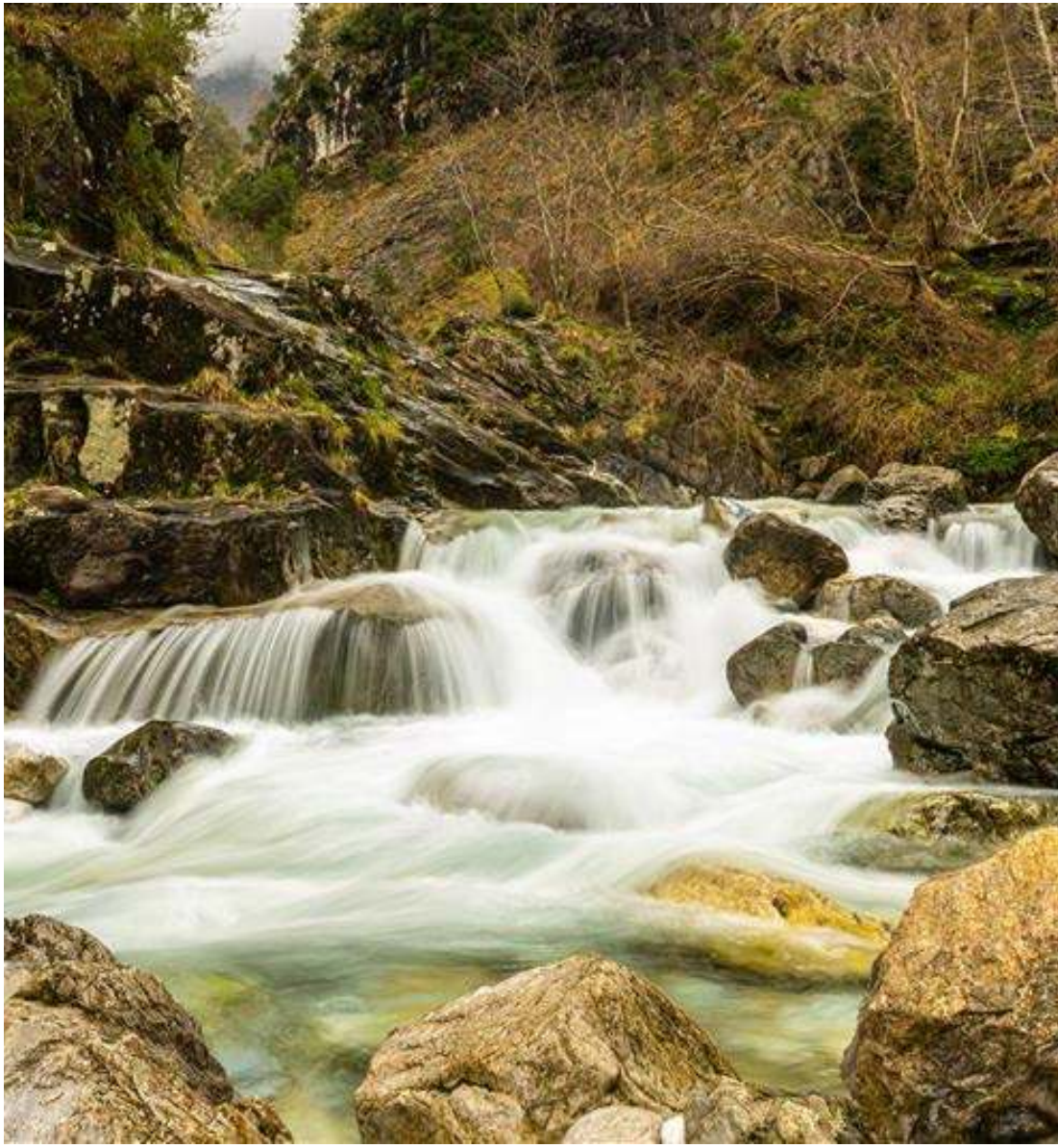
In particular, the Group performs the measurement of the relevant exposures (in terms of amount and concentration) ranked as potentially 'high ESG risks' through:

- the use of the 'ESG sectoral assessment approach' for NFCs exposures;
- the use of the 'ESG sovereign integration approach' for Sovereign bond portfolio.

These analyses are finalised to measure:

- the relevance of the impacted positions in the Group's Liquidity reserves;
- the potential loss of deposits from customers associated to sectors classified as high risk;
- the potential increase in unexpected drawdowns of committed lines granted to customers associated to sectors classified as high risk.

Starting from the NFCs exposures classified as 'ESG high risk', as described previously, a sensitivity analysis on the Liquidity Coverage Ratio is also performed. This process aims to assess a 'Liquidity Coverage Ratio drop' due to the erosion of the available Intesa Sanpaolo liquidity buffer, prudentially following the materialisation of instantaneous outflows. The assumptions underlying the simulations embed the loss of 100% of High Quality Liquid Assets identified as 'ESG high risk' (including positions referred to 'ESG high risks' Sovereign issuers), along with sensitivity analysis run from combined risk factors of corporate funding run-off and committed lines drawdowns, by applying different risk shocks calibrated with increasing severity.



CLIMATE AND ENVIRONMENTAL RISKS: MANAGEMENT AND MITIGATION

The supervision of ESG risks cannot be separated from the processes described in the previous sections (identification, measurement, and assessment), but it needs to be integrated with a robust management and mitigation process.

To do so, Intesa Sanpaolo Group sets out, within its Risk Appetite Framework, its strategic objectives to manage climate-related risks through the inclusion of different monitoring Key Risk Indicators and limits.

Furthermore, the mitigation of ESG risks is ensured through the definition of policies and processes aimed at screening counterparties and transactions for potential ESG risk drivers, as better detailed in the following paragraphs.

Focus:

RRE (Residential Real Estate) and CRE (Commercial Real Estate) Data Enrichment

As reported in the Pillar 3 disclosure, data enhancement initiatives continued throughout 2025, in order to further improve transparency over the Real Estate perimeter and strengthen the quality of data related to energy performance classes.

The following actions were undertaken to increase the collection of Energy Performance Certificates (EPCs) and related data:

- **remediation activities on the existing RRE and CRE portfolios**, aimed at increasing the coverage of energy performance class information and enhancing data availability for existing portfolios, through the retrieval of missing EPCs from external information providers and public databases and subsequently integrating them into the Bank's internal systems;
- **targeted actions on newly originated RRE exposures for private counterparties**, aimed at improving the availability of energy performance data for newly originated collateralised loans through the inclusion of EPC collection into the credit disbursement process, where required by law;
- **targeted actions on newly originated CRE exposures within the Target Setting perimeter**, aimed at improving the availability of energy performance data for newly originated collateralised loans through the inclusion of EPC collection into the credit disbursement process, where applicable and required by law.

CLIMATE CHANGE RISK IN INTESA SANPAOLO'S RISK APPETITE FRAMEWORK (RAF)

Intesa Sanpaolo has established several policies, processes, controls and limits to identify, estimate and monitor the relevant risks, both financial and non-financial, to which it is exposed. The overall framework within which corporate risks are identified and managed has been enriched in order to assess and limit also the climate-related risk. The management and the mitigation of the risks to which Intesa Sanpaolo is exposed require their clear identification and translation into metrics.

In this context, the so-called Risk Appetite Framework (RAF) 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, continuously identifying limits, Key Risk Indicators and specific actions aimed at containing ESG risks.

There are also specific provisions related to the Group's strategic initiatives such as, for example, the adherence to the Net-Zero objectives.

The development of controls in the ESG area also takes into account the main evidence from the most relevant risk assessment processes including Stress Test, Scenario Analysis and ESG risk assessment process.

Controls and limits dedicated to C&E risks have been set considering:

- the Bank's commitment to helping achieve global climate targets, reducing its environmental impact and promoting the transition to a low carbon economy;
- the Bank's acknowledgment of Climate Change as a material risk factor both on current and future credit risk as well as determining investors preference;
- the growing importance among all stakeholders of themes related to environmental sensitivity and ethical conduct.

The content of the 2025 RAF is intended to set limits to operations in order to reduce the climate change and environmental risk, and the most relevant ones are as follows:

- a tight limit on the exposure towards the Coal Mining[6] and Oil & Gas sectors;
- a synthetic risk metric based on the financed emissions of the corporate portfolio, aimed at improving transition risk management for the Power Generation, Oil & Gas, Automotive, Iron & Steel, Commercial Real Estate, Aluminium, Cement, and Agriculture – Primary Farming sectors;
- specific limits on new underwriting in the Residential Real Estate (RRE) portfolio, in particular, a limit on properties with low energy performance classes (EPC certifications) and a limit on properties located in the areas most exposed to acute physical risk, with the aim of improving the quality of the residential properties taken as collateral and therefore reducing both the transition and the physical risk relating to retail residential mortgages;
- a specific limit[7] in relation to exposure in debt securities issued by sovereign classified as 'ESG high risk', according to certain internal criteria concerning ESG aspects.

The RAF 2025 introduces greenwashing risk as an emerging risk, recognising that sustainability-related statements and actions that do not clearly and accurately reflect the sustainability profile of the entity, products or financial services may represent a risk factor for the Group's reputation, undermining stakeholder confidence and exposing it to potential penalties and litigation.

The main limitations and exclusions to sectors/counterparties most exposed to ESG risks are defined within the scope of the RAF and are then integrated into self-regulation policies and/or within the operational processes.

All transactions with counterparties presenting elements of significant environmental/climate risk (e.g., top polluting companies) are classified as Most Significant Transactions (MST) and therefore subject to a strengthened assessment and the binding opinion of the Chief Risk Officer.

Within the Risk Appetite Framework, particular importance is given to the Credit Risk Appetite, whose aim is to define the tolerated risk for each share of the loan portfolio with the ultimate goal of steering behaviors towards a prudent credit risk management. While assessing counterparties in the credit origination phase, factors related to the ESG profile of the counterparties are also considered. These factors contribute to the categorisation of the counterparty for the purpose of being subject to the limits envisaged for transactions considered most risky, and in particular to limit the exposure towards companies that are characterised by a clear direct involvement in activities exposed to climate and environmental risks. Credit risk appetite factors related to exposure to climate risks may consequently have potential repercussions through credit strategies on the pricing for customer financing transactions.

6 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.
7 In this case limits have to be intended as RAF Early Warning: these are predetermined levels related to the metrics identified in the RAF, which, if breached activate predefined escalation and/or mitigation processes.

SELF-REGULATION POLICIES

Among the measures taken in order to manage ESG risks, the Group establishes in the 'Group guidelines for the governance of Environmental, Social and Governance (ESG) risks' specific criteria for the limitation and the exclusion of operations in sectors that are sensitive to these risks, as well as criteria aimed at classifying sustainable credit products and lending transactions. With reference to the financing activity, the Group undertakes not to finance companies and projects that are characterised by their negative impact on:

- UNESCO World Heritage Sites[8] or their buffer zones. Where a buffer zone is not determined and the project is close to a World Heritage Site (i.e., less than 1 km from its border), the Group will decide on a case-by-case basis whether to apply the exclusion criterion;
- Wetlands[9] under the Ramsar Convention - wetlands included in the Ramsar Convention list;
- IUCN protected areas I to VI[10] - areas designed for the long-term conservation of nature, i.e., those areas classified by the IUCN ('International Union for Conservation of Nature') as protected areas in categories I to VI.

In addition, the Group undertakes not to finance companies and projects if, during the evaluation of the transaction, evidence emerges, such as sanctions, legal proceedings, and judgements, relating to human rights violations, forced or child labor practices.

In addition to these general exclusion criteria, for some economic activities, also identified on the basis of the evidence emerging from the ESG Sectoral Color Coding (i.e., the so-called 'Red sectors'), the definition of specific policies is envisaged, which establish criteria for the limitation or exclusion of financing activities, taking into account the specific nature of the sector and the purpose of the financing granted. In particular, these regulations are developed with the aim of limiting or excluding the financing of activities with higher ESG risk profiles, identifying eligibility criteria for counterparties in line with the Group's strategic objectives and with a view to engaging clients towards more sustainable business models.

For example, Intesa Sanpaolo is not providing support to projects aimed at the construction or expansion of new coal mines and at the construction of new coalfired power plants, as stated in the 'Rules for lending operations in the coal sector'. Other limits and exclusion criteria were set for general financing to coal mining and coal power companies. 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. Namely, the 'Rules on Oil & Gas sector', updated in June 2024 pose a limit to contain the exposure towards this sector and requires not to finance projects involving new oil extraction sites. In addition, specific limits and exclusions are foreseen for some activities with greater criticality from an environmental point of view, in particular with reference to 'unconventional' resources[11]. As regards these resources, the Group confirms the achievement of the phase-out objective in 2025.

The Group also regulates its operations with respect to risks related to biodiversity and ecosystems within the 'Rules on biodiversity and nature'. The rules establish specific limitation and exclusion criteria, refining risk assessment procedures and promoting sustainable financing aimed at conserving or enhancing biodiversity and ecosystem services, as described in the Strategy chapter, where the focus on 'Natural Capital Protection in Intesa Sanpaolo' is outlined.

8 This is a list of sites officially recognised by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). The sites are selected on the basis of cultural, historical, scientific or some other form of relevance and are legally protected by international treaties (http://whc.unesco.org/en/list).

9 This is a Convention of international importance that provides the framework for the conservation and prudent use of wetlands and their resources. Nearly 90% of the member states of the United Nations, from all geographical regions of the world, have acceded to the Convention by becoming 'contracting parties'. A key commitment of the Contracting Parties is to identify and place suitable wetlands on the List of Wetlands of International Importance, also known as the Ramsar List (https://www.ramsar.org/our-work/wetlands-international-importance/ramsar-list).

10 This is a list of protected areas (i.e., 'a clearly defined, recognised, dedicated and managed geographical area, through legal instruments or other effective means, to achieve long-term nature protection with associated eco-systemic services and cultural values'), which have been identified and classified (Class I to VI) by the International Union for Conservation of Nature (IUCN), a union of members consisting solely of governmental and civil society organisations. The categories are defined as follows (https://www.protectedplanet.net/):
- I Strict protection [Ia) Strict nature reserve and Ib) Wilderness;
- II Conservation and protection of ecosystems (e.g., National Park);
- III Conservation of natural features (i.e., natural monument);
- IV Conservation through active management (e.g., Habitat/species management area);
- V Landscape/seascape conservation and restoration (e.g., protected landscape/seascape);
- VI Sustainable use of natural resources (e.g., protected area of managed resources).

11 Unconventional resources defined as: shale/tight oil, shale/tight gas, tar sands/oil sands, coal bed methane/coal seam gas.

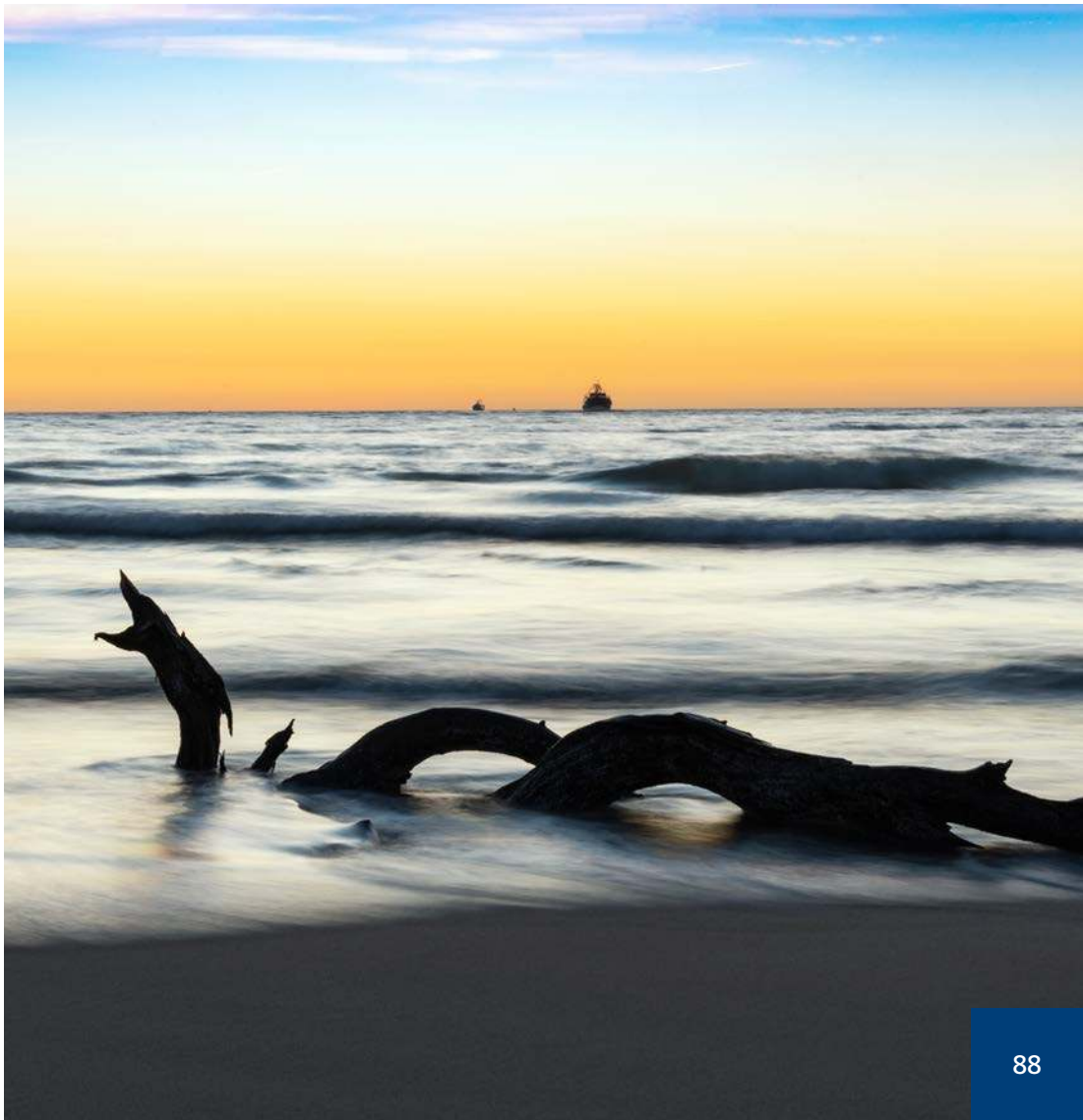
THE ESG RISK ASSESSMENT PROCESS ('ESG & REPUTATIONAL RISK CLEARING PROCESS')

In line with the Group's ESG strategy, C&E risks are also managed through a specific ESG & Reputational Risk Clearing process aimed at identifying and assessing in advance the potential risks associated with credit transactions involving counterparties operating in the sectors most exposed to ESG risks. On a wider basis, the process also concerns extraordinary transactions that modify the corporate/Group structure, supply contracts and partnerships with third-party counterparties for specific initiatives (financial and non-financial) and outsourcing of activities.

With specific reference to the credit process, credit proposals assessed are those identified as critical by a preliminary ESG issues evaluation (e.g., are classified as most carbon-intensive worldwide[12] or that are particularly subject to negative media attention, or that are located in areas more exposed to biodiversity and ecosystem risk), as well as proposals that relate to counterparties operating in the coal mining sector. The process provides for differentiated escalation mechanisms according to the ESG risk class assigned to the transaction/counterparty.

The ESG & Reputational Risk Clearing process consists of an in-depth assessment of ESG risks that are associated with the transactions and the counterparties. The first-level assessment is entrusted to the proposing units with the aim of carrying out a preliminary analysis of the potential ESG and reputational criticalities of the transaction and/or the counterparty; the second level clearing aims at deepening and evaluating any critical issues related to counterparties and transactions that may require additional analysis of ESG and reputational profile that may emerge from the first level and is executed by the DC Enterprise Risk Management. If this analysis reveals potential critical issues, the transaction is subject to a second-level assessment carried out by the competent units of the Risk Management.

The outcome of the analysis consists of an advisory opinion that includes an assessment of the main critical issues identified, the related mitigating factors and the class of risk attributed to the transaction. In the presence of risk classes that are not consistent with the Bank's risk appetite, specific escalation mechanisms are activated. In particular, transactions assessed equal to or higher than 'Medium-High' are classified as the Most Significant Transactions and an enhanced assessment process that requires the approval of the Steering Committee, Business Plan and Sustainability (ESG) Session is envisaged.



12 Defined as 'top polluters' by the 'Climate Accountability Institute'.

Through this process, the risks associated with the environmental impacts of the sector and the operations of the counterparty are assessed (for example polluting emissions and the consequences on biodiversity), together with the adoption by the counterparty of any containment and mitigation measures to improve business sustainability; with particular regard to climate change risk (transition risk), the degree of exposure is assessed, examining the counterparty's commitment to adopt transition plans aimed at reducing GHG emissions and to set, within a defined time-frame, carbon neutrality objectives, to increase the use and/or production of energy from renewable sources and, for the sectors subject to target setting, an assessment of consistency with the commitments taken by Intesa Sanpaolo is provided.

Preliminary ESG evaluation classifies credit proposals as critical considering different drivers, like for example:

- ESG Sectoral Color Coding
- Counterparty-level ESG score
- Counterparty's carbon-intensity, negative media attention, legal proceeding...

The ESG Risk Assessment considers multiple dimensions when issuing an advisory opinion, such as for example:

- The ESG profile of the counterparty, of the sector and of the country it belongs to
- Transition risk profile for high transition risk sectors
- Any mitigating factors

Moreover, a deep dive is carried out for transactions subject to the Equator Principles (EP)[13]. The loans subject to the screening of the Equator Principles that reached financial close in 2025 amounted to 45 (for a total of 511 since 2007) for a total amount of ~€ 3.66bn. The EPs provide for the assignment of a risk category to projects to be financed (A high, B medium, C low) based on variables such as the socioenvironmental characteristics of the country, the industrial sector to which they belong and the specific characteristics of the project. Higher risk projects and, if appropriate, medium risk projects are assessed by an independent consultant who identifies their main social and environmental impacts. The tables below show the number of projects that achieved financial approval in 2025, broken down by category, sector, region, type of country and independent audit.

	Total	Category A	Category B	Category C
Project Finance [no.]*	43	7	15	21
Project related Corporate Loans [no.]*	2	2		

Project Finance [no.]*	Category A	Category B	Category C
Total	**7**	**15**	**21**
Sector			
Oil and gas	4	2	
Mining			
Energy	2	12	2
Infrastructure		1	
Other	1		19
Region			
Americas	4	13	7
Europe, Middle East and Africa (EMEA)	3	2	14
Asia and Oceania			
Type of country**			
Designated	4	14	16
Not designated	3	1	5
Independent audit			
Yes	7	12	9
No		3	12

Project related Corporate Loans [no.]*	Category A	Category B	Category C
Total	**2**		
Sector			
Oil and gas			
Mining			
Energy	2		
Infrastructure			
Other			
Region			
Americas			
Europe, Middle East and Africa (EMEA)	2		
Asia and Oceania			
Type of country**			
Designated	2		
Not designated			
Independent audit			
Yes	2		
No			

* Refers to the number of projects that were financially completed in 2025.
** Designated countries: countries considered as having solid environmental and social governance, legal systems and an institutional capacity conceived to protect the population and natural environment. The list of designated countries is available on the Equator Principles Internet site. The Equator Principles envisage the assignment of a risk category to the projects to be financed (A is high, B medium and C low).

Project finance and project related corporate loans closed during the year*	Unit	2024 Group	2025 Group
Projects	no	32	45
Economic Value	mln euro	2,579	3,661

* Projects that were financially completed during the year.

13 Equator Principles are international guidelines Intesa Sanpaolo has adhered to since 2007 (the Group currently adopts the 'EP IV', updated version of the guidelines). https://equator-principles.com/.

MANAGING ESG RISK FACTORS FOR DIFFERENT RISK CATEGORIES

Credit Risk

Climate and environmental risk factors are considered in assessing the creditworthiness of counterparties and in the credit granting process, ensuring their monitoring within portfolios. More in details, C&E risks are taken into account with reference to the credit ratings attribution processes, as part of the Credit Risk Appetite and in the assessment of collateral for credit granting purposes.

In the qualitative component of the rating models currently validated and used by the Group, various aspects and elements related to the ESG and 'Climate' areas are taken into consideration. For Large Corporates, a specific module has been incorporated into the model which considers quantitative ESG information. For the Corporate model, in addition to high-level qualitative components covering socio-environmental risks, as well as for SME Retail model, in order to take into account the counterparty's exposure to physical risks deriving from catastrophic events (e.g., damage to production plants or warehouses), a specific module has been statistically estimated. Starting from the historical and public evidence of catastrophic events (e.g., floods, fires, earthquakes) observed at geographical area level, it identifies potential deteriorations in the probability of default. Finally, the potential exposure to climate change and natural disasters, as well as the respect of territory for bigger initiatives, have been recently included in the real estate and project finance rating models.

Market Risk

In managing market risk, Intesa Sanpaolo also assesses the effects of climatic and environmental factors on its current positions exposed to market risk.

The Group:

- analyses and monitors market prices and liquidity of financial instruments to identify possible evidence of climate and environmental risk factors;
- analyses the impact of climate and environmental risks on the measurement of financial instruments at fair value, with particular focus on the main asset classes, payoffs and positions explicitly linked to climate & environmental risk factors, as well as on future investments proposed by business units;
- classifies current positions subject to market risk within the Climate/ESG materiality assessment and the scenario analysis, as better detailed within the 'Climate and Environmental Risks: Identification and Assessment' section of this chapter;
- integrates the ESG risk management within the decision-making processes relating to the investment in financial assets for banking book portfolios defining specific negative and positive screening criteria aligned with the overall ESG risk management framework and with the Self-Regulation Policies.

Liquidity Risk

In managing liquidity risk, Intesa Sanpaolo intends to assess the direct or indirect effects of climate and environmental risks on the Group's current and prospective liquidity position. This includes an impact assessment of relevant climate and environmental risks in terms of potential net cash outflows and potential erosion of liquidity reserves, as better detailed within the 'Climate and Environmental Risks: Identification and Assessment' section of this chapter. The Group therefore:

- identifies climate and environmental risk factors that could adversely affect the Group's liquidity positions within the climate/ESG materiality assessment;
- carries out the analysis and monitoring of exposures for the assessment of the materiality of the risk factors identified on the Group's current and prospective liquidity risk position;
- carries out sensitivity analyses based on the potential impact of ESG High Risk exposures on relevant liquidity metrics (e.g., Liquidity Coverage Ratio LCR), by applying different scenario assumptions;
- conducts stress tests on liquidity risk, including forward-looking analyses, and includes results in the ILAAP reporting.

Operational Risk

In managing operational risks, Intesa Sanpaolo also considers the possible adverse impact of climatic and environmental events on its real estate properties, on business continuity as well as on litigation risk, as better detailed within the 'Climate and Environmental Risks: Identification and Assessment' section of this document. In particular, the Group:

- identifies within operational events those related to climate and environmental risks; the taxonomies used within Loss Data Collection have been enriched in order to include categories specifically dedicated to disasters that can be related to Climate Change risk (e.g., floods, heat waves) and to all types of Environmental-related litigations;

- assesses, during the Self-Diagnosis process, the possible losses deriving from damage to real estate properties, from possible interruptions to its operations and from possible legal liabilities, by means of specific risk scenarios dedicated to climatic and environmental risks. Moreover, during the Self-Diagnosis process, the impacts for the Group of extreme climate events that affect essential third parties by compromising critical outsourced services, are assessed through dedicated scenarios;
- to protect business continuity, assesses the impact of physical risks associated with IT centers and sites (including outsourced IT services).

With specific reference to climate/environment-related litigation risk, the framework defined by the Group takes into consideration the possible emergence of issues related to critical climatic and/or environmental issues and their monitoring over time, such as, in particular the violation of the current ESG regulatory framework, the non-fulfillment of contractual and possible non-contractual liabilities, greenwashing and violation of ESG disclosure obligations (please also see the Operational risk – Measurement framework paragraph above).

In this respect, Intesa Sanpaolo periodically carries out the monitoring of lawsuits impacting peers (domestic and international), fine-tuned the process for monitoring its own potential disputes and carried out specific training initiatives addressed to dedicated personnel.

Reputational Risk

In managing reputational risk, the Group assesses ex-ante the potential ESG and reputational risks associated with business operations and the selection of Group suppliers/partners through the ESG & Reputational Risk Clearing process.

The Group also monitors its web reputation by integrating specific assessments on events related to environmental risks/climate change (e.g., events deriving from protests or adverse campaigns deriving from the Bank's financing activity, greenwashing practices related to counterparties or third parties). Finally, specific scenarios relating to ESG and climate issues are included in the annual reputational risk assessment process by top management.

The Group is working to enhance its processes for early identification of events that may impact its reputation in relation to climate and environmental matters, including potential greenwashing risks.

CLIMATE AND ENVIRONMENTAL RISKS WITHIN THE ASSET MANAGEMENT, PRIVATE BANKING AND INSURANCE ACTIVITY

With regard to the investment policies and services provided to customers, the Group is committed to integrating ESG factors into investment analysis and decision-making, issuer selection criteria and investment management by progressively expanding the monitoring of financial assets in terms of ESG performance as well as extending its proposal of sustainable financial products.

As signatories of the Principles for Responsible Investment (PRI) promoted by the United Nations, Eurizon Capital SGR, Fideuram - Intesa Sanpaolo Private Banking with regards to individual mandates' managed on behalf of clients, and Fideuram Asset Management Ireland, pay particular attention to the policies implemented by the issuers in which they invest on environmental, social and governance issues. Similarly, Intesa Sanpaolo Assicurazioni follows the same approach as a signatory of the Principles for Sustainable Insurance (PSI).

Asset Management

Eurizon has defined specific methodologies to select and monitor financial instruments aimed at considering sustainability aspects in the investment process regarding collective asset management and portfolio management services.

These methodologies are defined based on the characteristics of the products and their classification in accordance with the SFDR (Sustainable Finance Disclosure Regulation) and can be summarised in the following 'Macro Strategies':

- **negative screening**, i.e., restrictions or exclusions differentiated by type of corporate or government issuer and considering different indicators concerning:
  - corporate issuers operating in sectors considered 'not responsible', including thermal coal, oil sands and unconventional weapons activities; i.e., restrictions are applicable to corporate issuers characterised by a clear direct involvement in (a) the extraction or generation of electricity from thermal coal and (b) extraction of oil and gas, through the exploitation of sands;
  - corporate issuers violating globally accepted principles (e.g., UNGC, OECD, ILO, UNGP);
  - corporate issuers deemed 'critical', i.e., those companies characterised by a higher exposure to environmental, social and governance risks;
  - government issuers characterised by greenhouse gas (GHG) emissions intensity levels above a tolerance threshold, as well as those included in the Financial Action Task Force (FATF) Black List of high risk countries;
- **positive screening**, in compliance with good governance practices[14], involves the integration of ESG factors in the analysis through different strategies with the aim to:
  - promote, among others, environmental and/or social characteristics, pursuant to Article 8 of the SFDR;
  - pursue sustainable investment goals pursuant to Article 9 of the SFDR (so-called 'Sustainable Investments');
- **stewardship:** proactive interaction with issuers, through the exercise of participation and voting rights, as well as carrying out engagement activities. In line with the commitments undertaken in joining the NZAMI[15], Eurizon prioritises engagement activities with companies, among other, considered to be lagging behind in the decarbonisation process (so-called 'laggards').

Eurizon has defined, for each of the Strategies, specific decision-making processes and operating limits aimed at containing the risks, also reputational, of managed portfolios.

In order to assess the principal adverse effects of investment decisions and investment advice on sustainability factors and to identify possible mitigation actions, Eurizon has established a specific framework that defines how the so-called 'Principal Adverse Impact indicators' (PAIs) are taken into account within the managed assets, as set out in Delegated Regulation (EU) 2022/1288 (so called 'Regulatory Technical Standards' or 'RTS') of the SFDR. The framework provides for the use of specific indicators associated according to the characteristics and objectives of each financial product, based on the safeguards already established by the Company, which include the use of the 'macro-strategy' of negative screening, positive screening and stewardship, as reported above.

Eurizon has adopted — as an additional assessment element to support the investment decisions of the managers — different internal proprietary scores that integrate environmental, social and governance factors referring to corporate issuers, government issuers and third parties funds.

Eurizon has implemented a model that estimates climate risks also through the 'Climate Adjusted Value' (CAV), a forward-looking metric which integrates the two dimensions of 'Transition Risk' and 'Physical Risk'.

14 Products classified under Articles 8 and 9 of the SFDR Regulation invest in companies that follow good governance practices, as specified in the same Regulation, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

15 On 13 January 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context. During this review phase, the initiative suspended activities to track signatory implementation and reporting. On 29 October 2025, the review was completed with the relaunch of the initiative and the adoption of an updated framework that introduces greater flexibility in the definition of targets, while maintaining the commitment to transparency and annual reporting. At the relaunch of NZAMI in Q1 2026, Eurizon Capital SGR and Fideuram Asset Management Ireland confirmed their membership to the initiative.

The CAV under a given climate scenario represents the impact on the security's valuation under that scenario from both Physical and Transition Climate shocks relative to the counterfactual, which assumes no further physical climate change or policy action.

The determination of this metric's value varies depending on the type of asset class being analysed.

For Equities, the CAV is obtained as the linear sum of the impacts resulting from physical and transition risks.

For Corporate Bonds, the Combined Risk on securities is calculated in three steps:

- the CAV on equities is first computed as the aggregate impact from physical and transition Risk;
- the equity impact is then translated into a credit impact on the bond universe by computing corresponding Combined Risk credit shocks, which are then converted to equivalent CAVs for the bonds. The credit model translates the equity climate impact to equivalent shocks to the Probability of Default (PD) on the bond. In addition to the climate impact on the bond-issuing entity, other characteristics of the bond such as its rating and maturity also contribute to the resultant impact on its valuation under a given climate scenario;
- from these shocks, the CAV for corporate bonds is determined. Any uncovered securities are handled using proxy.

For Sovereign Bonds, in the CAV calculation, physical risk and transition risk GDP losses are incorporated to generate one credit shock at the aggregated level. More specifically, three phases can be distinguished:

- assessment of the impact of the combined GDP loss between transition risk and physical risk;
- determination of the combined credit shocks from the resulting combined GDP. Here again, the combined rate shock is not simply an addition, as the phenomenon does not follow a linear dynamic;
- calculation of the pricing impact from the resulting calibrated aggregated credit shocks. Similar to the credit shock results, the bond price changes in transition risk and physical risk also do not add up directly to the combined price change given the nonlinearity in the calculation of the credit shocks.

The transition risk and physical risk models implemented by Eurizon are described below.

The transition risk model quantifies the impact of potential transition scenario pathways toward a low-carbon economy on the value of assets.

The model considers both corporate and sovereign issuers and follows different approaches for each.

For corporate issuers, the model leverages scenario inputs as well as operational and financial data for each company and combines them through a bottom-up analysis on the company's operations, asset profiles and financials.

The transition risk model consists of three phases:

- the assessment of transition risks is based on NGFS scenarios, incorporating additional variables such as carbon prices, energy demand, fuel prices and emissions at regional and global levels;
- scenario data, combined with individual asset-level data (financial data, emissions, targets, production mix, etc.), fed into financial models known as the Company Impact Model (CIM). These models translate the impact of transition on various financial parameters during a projection period ending in 2050;
- the CIMs generate two projections. The first applies climate scenarios to reflect the impacts of transition risks, while the second imposes no climatic constraints. By calculating the difference between the two projections, variations in free cash flow and leverage resulting from climate risks are obtained. These values, along with other financial variables impacted by climate risks, are used to calculate the impact on the company's value (TCAV). Additionally, the model assesses the probability of default associated with the change in the company's value due to transition risks and other credit parameters.

For sovereign issuers, the transition risk model consists of three components:

- NGFS Climate Transition Economic Modeling: transition risks resulting from climate change are assessed based on NGFS scenarios;
- Sovereign Issuer Modeling: each issuer is assigned a risk score on a scale from 1 to 10, calibrated based on a risk metric that reflects exposure to climate risk. The loss of GDP at the aggregate level is used to measure the classification of each issuer based on climate risk;
- Single Security Pricing Model: the model calculates various outputs, including transition risk-adjusted simulations such as changes in the price of sovereign bonds and increases in the probability of default resulting from transition risks. It also considers transition risk macroeconomic shocks, such as shocks on GDP and inflation based on NGFS data and provides risk scores at issuer and individual issue level.

Overall, the transition risk model adopted by Eurizon provides a comprehensive framework for assessing the impact of transition scenarios towards a low carbon economy on the value of assets. It considers climate risk drivers, company-specific impact, asset valuation, and provides valuable insights into the changes in asset values and credit parameters associated with transition risks.

The physical risk model implemented by Eurizon provides a comprehensive framework for quantifying the impact of climate change on asset value in multiple climate scenarios. The physical risk model employs different approaches depending on the type of issuer.

For corporate issuers the physical risk model incorporates climate risk models and econometric models to calculate climate-adjusted revenues and costs, and subsequently climate-adjusted profits and cash flows.

These calculations are used to determine the impact on the value of the company, referred to as the Physical Climate-adjusted value.

The approach to quantifying the impact of climate change on corporate issuers involves four phases:

- modelling of climate scenarios: the model identifies scientific climate models developed by the academic community to predict climate data related to temperature increase, sea level rise, and extreme weather events. Two sets of scenarios are considered: IPCC scenarios and NGFS scenarios;
- economic impact: the economic impacts of the identified scenarios are assessed using climate econometric models. The model evaluates multiple impacts of physical risks on macro and micro variables, such as GDP, labour productivity, production costs, energy costs, and direct physical damage;
- financial impact: the economic impact resulting from climate change is converted into financial impact. For corporate issuers, the impact on revenues is assessed based on the location of revenues at country level;
- valuation of the company: the model quantifies the impact of climate change on the company value under different climate scenarios. Climate-adjusted cash flows are determined based on the estimated impact of climate risks on financial parameters. These cash flows are used in a Discounted Cash Flows (DCF) model to calculate the Physical Climate-adjusted value and the change in company's value compared to the unadjusted base scenario. The model also calculates the Climate-adjusted Probability of Default at different time horizons.

The physical risk model for government issuers follows a similar four-phase approach:

- modelling of climate scenarios: the model identifies scientific climate models to predict climate data related to temperature, precipitation, hurricane activity, fires, floods, and sea level rise;
- economic impact: the economic impact of the scenarios is evaluated using climate econometric models;
- financial impact: the pricing model translates the economic impact into financial impact by calculating the variation in yields and spreads of sovereign bonds at country level;
- evaluation and analytics: the model quantifies the impact of climate change on government issuers by incorporating the yield and spread estimates into various analytics, such as yield to worst and duration.

The final results for each scenario considered include the change in the price of sovereign bonds and the change in the probability of default at different time horizons.

Private Banking Division

During 2025, the Wealth Management Divisions were subject to a corporate reorganisation, which also involved the Private Banking Division. One of the goals is to make Fideuram - Intesa Sanpaolo Private Banking a center of excellence for portfolio management services placed by the Private Banking Division. As of the first of July, Fideuram Asset Management SGR terminated its activities. It has been split to the benefit of Fideuram - Intesa Sanpaolo Private Banking for the compendium of Individual Mandates' activities and to the benefit of Eurizon for the activities related to funds (Ucits and FIA).

Following this reorganisation, in addition to the traditional banking activities, Fideuram - Intesa Sanpaolo Private Banking also carries out portfolio management activities.

Regarding banking book risks (credit, market, liquidity, operational and reputational risks), Fideuram - Intesa Sanpaolo Private Banking fully adopts the Risk Management framework implemented by the Parent Company Intesa Sanpaolo. However, ESG risks drivers impact not only on the Private Banking Division's banking book (i.e., lending and investments portfolios), but also on the Division's assets under management (AuMs) representative of the customers' portfolios. Hence, with the aim of protecting customers' interest, the Risk Management department, through Scenario analysis, runs simulations aimed at assessing potential impact on P&L of customers portfolios in case of occurrence of stress scenarios affecting the financial

markets. Among these, the Carbon Policies Scenario investigates the short-term impact of a macroeconomic policy announcement on the current EU greenhouse gas emissions market.

On the other hand, the Fideuram - Intesa Sanpaolo Private Banking portfolio management activities inherited the Risk Management framework previously implemented by Fideuram Asset Management SGR. In line with Principle 1 of the PRI and with the requirements of Regulation (EU) 2019/2088 (SFDR) on information on sustainability in the financial services sector, Fideuram - Intesa Sanpaolo Private Banking portfolio (for activities related to Individual Mandates) and Fideuram Asset Management Ireland have defined specific methodologies for selecting and monitoring financial instruments in order to consider sustainability risks within the Portfolio Management, integrating ESG metrics into traditional financial assessment analysis on investments.

These methodologies are appropriately defined based on the characteristics of the products and their classification in accordance with the SFDR and can be summarised in the following 'Macro Strategies':

- **negative screening**, i.e., restrictions or exclusions concerning:
  - issuers operating in sectors considered 'not responsible', including thermal coal, unconventional Oil & Gas, nuclear and unconventional weapons activities; the issuers operating in the production and/or marketing of ordinary weapons are also excluded, with the exception of issuers having less than 5% of their revenue from such activities and issuers belonging to European Union and/or NATO countries;
  - issuers deemed 'critical', i.e., those companies characterised by a higher exposure to environmental, social and governance risks;
- **positive screening**, in compliance with good governance practices:
  - integration of ESG factors in the analysis, selection and construction of managed portfolios;
  - pursuing sustainable investment goals (so-called 'Sustainable Investments'), through methodologies to select investments aiming at contributing to the UN Sustainable Development Goals, aligned with the European Taxonomy or engaged in decarbonization processes validated by the Science Based Targets initiative (SBTi), with no significant harm to any of the objectives and following good governance practices; generating a positive social and environmental impact together with a measurable financial return;
- **stewardship**: Fideuram Asset Management Ireland employs stewardship to consider sustainability risk, engaging a proactive interaction with issuers, through the exercise of participation and voting rights, as well as carrying out engagement activities.

For each strategy, Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland have defined specific decision-making processes and operating limits aimed at containing risks of the managed products connected to ESG and SRI issues, compliance with which is monitored by the Risk Management function with the support of the Compliance Function.

Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland are aware that investment decisions could generate direct and indirect impacts, both positive and negative, on environmental, social or governance factors of sustainability; for this reason, they adopt specific policies referred to the adverse impacts of investment decisions on sustainability factors ('Principal Adverse Impact indicators' or 'PAI').

In order to better define the company's actions with respect to the Principal Adverse Impacts deriving from its investment decisions, Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland have identified the fight against climate change and the respect for human rights as priorities among sustainability issues. In particular Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland adopt asset class specific strategies to manage PAI: regarding the investments in securities, the Companies apply negative screening and are engaged in focused alliances and initiatives while, regarding the investments in target UCITS, they focus their investments in UCITS having the same priority in terms of PAIs.

In addition, both Companies monitor the entire portfolio on the basis of a series of environmental, social and governance indicators, through the information collected by a specialised info-provider. The issuers or investments exhibiting particularly negative performance in terms of adverse impacts on sustainability factors are presented to the ESG Committee which may decide to initiate specific actions, starting from engagement to specific actions to reduce or dispose of investments, which can even be of a progressive nature.

Regarding a dedicated universe of third-party asset managers and ESG/SRI funds, the financial analysis of these assets is integrated with ESG or SRI considerations aimed at deepening:

- whether the asset manager has adopted an investment policy that includes ESG or SRI criteria;
- the investment policies of the individual fund, verifying: the promotion of environmental or social characteristics, or a combination thereof; the adoption of sustainable investment objectives; the potential presence of additional, distinctive ESG characteristics in the management of individual products and the alignment to the PAI selected by Fideuram - Intesa

Sanpaolo Private Banking and Fideuram Asset Management Ireland as entity and/or for specific products.

Moreover, as part of the Companies engagement activities, Portfolio Management and Multimanager promotes awareness initiatives towards third-party Asset Managers in which it invests, to involve them in matters of relevance to the Companies.

Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland are progressively extending the more general risk management framework, related to the portfolio management process, to take into account of both physical and transition risk factors, which in line with the Group's taxonomy includes the same risk factors identified by the Parent Company, and how these factors can significantly impact investment value through their relationship with the main existing risk types (i.e., market, liquidity, operational).

In particular, regarding portfolio management activities, Companies have adopted a specific 'Climate Solutions' module provided by an external provider and integrated within the investment process in order to estimate climate risks through the 'Climate Adjusted Value' (CAV), a forward-looking metric which integrates the two dimensions of 'Transition Risk' and 'Physical Risk'. These measures can be used together or added to the other quantitative indicators already in use (e.g., ESG Score, PAI) within the issuer evaluation process.

Insurance Activity

The Intesa Sanpaolo Assicurazioni Group has also expressed its commitment to strengthen the integration of sustainability principles within its strategy and has established methodologies to select and monitor investments according to sustainable investment criteria. The Group is committed to expanding its range of products, investment options and services with sustainability features to be achieved through the placement of pension and insurance investment products and by supplementing customer documentation with detailed information.

The Assicurazioni Group also incorporates environmental, social and governance aspects in its investment processes in financial instruments underlying the insurance products in its portfolio, with the aim of generating a positive impact while also encouraging the companies in which it invests to move along this direction. In particular, the Group's commitment is reflected in the definition of a Policy for incorporating ESG factors and the principles of Sustainable and Responsible Investments (SRI) within the investment process.

The Policy, in particular, in order to integrate ESG factors into its investment choices, establishes the criteria for the exclusion from the investment portfolio or restricted investment of corporate and sovereign issuers:

- exclusion of issuers operating in sectors deemed not to be 'socially responsible', identified using Principal Adverse Impact (PAI) indicators, to which restrictions or exclusions apply with respect to the Investment Universe of the individual assets under management;
- exclusions and restrictions with respect to issuers defined as 'critical' i.e., those companies with a higher exposure to environmental, social and corporate governance risks, (ESG rating equal to 'CCC' assigned by a specialised info-provider);
- for products classified under Articles 8 and 9 pursuant to SFDR, exclusions with respect to issuers that do not comply with sound governance practices assessed with reference to the presence of solid management structures, relations with personnel and their remuneration, and compliance with tax obligations;
- exclusion of sovereign issuers most exposed to sustainability risks, identified through the analysis of specific environmental and reputational indicators. In particular, it will be excluded:
  - countries included in the Financial Action Task Force (FATF) Black List;
  - countries that have GHG emissions (Scope 1, 2 e 3) relative to GDP (purchasing power parity-adjusted) higher than a specific threshold;
- the Insurance Group has also incorporated the 'Do No Significant Harm' (DNSH) principle into its definition of sustainable investment, in addition to the two principles already in place (e.g., verification that the investment contributes to at least one environmental and social objective and the adoption of good governance practices).

The Insurance Group periodically monitors, at least on a quarterly basis, investments in sectors considered sensitive from an environmental, social, or reputational perspective. These sectors are identified on the basis of ESG sector analyses, risk scenarios, and the strategic guidelines of the Intesa Sanpaolo Group.

The Insurance Group also promotes proactive engagement with issuers by exercising participatory and voting rights, including through Delegated Managers and by engagement with investees, encouraging effective communication with the Management of the companies i.e., 'active ownership – engagement'.

As part of the selection and monitoring process of UCITS (so-called Manager Selection Integration) — both promoted and distributed by the Group companies and by third-party fund houses — the Insurance Group, when directly supervising the selection process of the UCITS, includes the financial analysis of the UCITS by analysing the level of integration of SRI and/or ESG factors and the related sustainability risks, through a Due Diligence process.

In addition, the Policy on Principal Adverse Sustainability Impact (PAI) defines the procedures for considering the principal adverse impacts of investment decisions on the identified sustainability factors, the identification of priority PAIs and a review of the monitoring system not only at company level, but also for Articles 8 and 9 investment options.

This process is done mainly with the objective of:

- making customer information clear and understandable by informing customers about financial products with sustainable characteristics or investment objectives;
- offering clients an advisory service with a high level of protection and, as part of the client profiling process, collecting information on any investment preferences regarding sustainability.

In terms of impacts of climate risks, the Life insurance activity is deemed to have a higher level of exposure to transition risk, particularly considering the recent implementation of new climate regulations. The Non-Life insurance activity is considered to have a higher level of exposure to physical risk.

Intesa Sanpaolo Assicurazioni Group in the context of Own Risk and Solvency Assessment (ORSA) has integrated different metrics to evaluate the exposure and potential impact of climate change on its assets.

The Insurance Group, regarding the Life insurance, adopted the Climate Value at Risk (CVaR), a model provided by a specialised infoprovider, that using a forward-looking metric provides a percentage estimate of the potential impact of physical and transition climate risks on a security's market value.

The tool offers the possibility to select different climate scenarios model provided by the academic community. Each scenario evaluates how climate policy, emissions, and temperature will evolve over time projecting an anomaly global mean surface temperature at 2100, anomaly compared to the pre-industrial levels at 2100. Among different climate scenarios, NGFS scenarios have been adopted, covering both physical and transition risk.

The last developments of the tool introduced a multi-horizon perspective. The Insurance Group integrated three time-horizons (short, medium and long-term) and multiple NGFS climate scenarios (Net Zero 2050, Delayed Transition and Current Policies). The selected scenarios allow to estimate the impact of climate change assuming three different paths of the increase of the global mean surface temperature at 2100 (in line with 1.5°C, below 2°C and about 3°C).

In addition, to evaluate the alignment of the portfolio to the Paris global temperature targets, the Implied Temperature Rise (ITR) tool has been adopted. This tool, based on the last release, covers equity, corporate bonds and funds.

Regarding the Non-Life insurance, ESG performance mapping, the so-called 'NatCat' (natural catastrophe events) guarantees with a focus on flood and hail guarantees, the volume of premiums and claims by branch/guarantee/performance gross and net of reinsurance are annually analysed considering the NGFS Delayed Transition and Current Policies climate scenarios in order to stress physical risk. On the liability side, no specific stresses were performed on transition risk. Considering the various risk categories analysed, it's assumed that physical risks could impact insurance liabilities in the short, medium and long-term. The model considers reinsurance policies in force during the reporting year and the potential increase in reinsurance cost due to the applied scenarios.

Both scenario analyses are used to estimate the climate change impact on the solvency and financial resilience of the Insurance Group.

CLIMATE AND ENVIRONMENTAL RISKS: MONITORING AND DISCLOSURE

Intesa Sanpaolo activities undertaken within the climate-related risk management process and the associated results are taken in due consideration by both internal and external stakeholders.

In this sense, Intesa Sanpaolo produces and updates different documents and reports, which do not only include documents required by regulatory Authorities, but also voluntary disclosure initiatives and internal reporting to support the Board and the Top Management in their strategic decision activities.

The results of the identification, assessment, mitigation actions above mentioned are substantiated in reports to the Board of Directors, Committees, Top Management and relevant structures.

Additionally, the Group has been involved in different regulatory exercises (e.g., EBA's One-off Fit-for-55 climate risk scenario analysis, EBA's Short Term Exercise with specific focus on climate change risks) and provides a deep insight of its climate-related risks integration in the risk management framework through the Internal Capital Adequacy Assessment Process/ILAAP and stress testing yearly exercises, in accordance with the Supervisory Review and Evaluation Process (SREP).

Besides internal reporting, Intesa Sanpaolo, in line with regulations and supervisory expectations, continues its commitment to publishing an integrated set of sustainability disclosures. In addition to the Climate Report, the Group publishes the Consolidated Sustainability Statement, and the Sustainable Development Goal's Report (SDGs Report) which presents the ESG performance and results achieved by the Group. ESG risk management and results disclosure is also included half-yearly in the Pillar III reporting, as required by EBA regulation, with a dedicated section on environmental, social and governance risks.

Among the disclosure activities, in addition to the Climate Report, Intesa Sanpaolo integrates its sustainability reporting by including the Responsible Banking Progress Statement, the Green and Social Bond Report and the Ex-ante impact assessment report of funding to non-profit organisations.

DIRECT ENVIRONMENTAL RISKS

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 IT platform addresses the essential need to systematically and promptly assess the physical vulnerabilities related to climate change risks and other territorial risks for each asset. The goal is to enhance the oversight and control of risks to the real estate assets, improve worker safety by implementing appropriate risk mitigation measures, and increase stakeholder awareness of the Bank's exposure to climate change-related 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 and Civil Protection. In addition, the platform considers the whole variety of physical risks arising from climate change (e.g., flooding, drought, storm surge) and territorial factors (e.g., earthquake, landslide) to provide an overall risk exposure index for each real estate asset, on the basis of a specific, customised calculation model.

The platform also allows the identification of Intesa Sanpaolo Group's buildings that are wholly or partially located within the areas included in the World Database on Protected Areas (WDPA), the most comprehensive global database on terrestrial and marine protected areas, including also Natura 2000 sites. While the activities carried out by Intesa Sanpaolo in the Group's offices generally do not impact biodiversity, the Bank will nonetheless screen its offices to assess their potential location in or near areas of high naturalistic value. At the moment, 5 buildings have been identified in Italy that wholly fall within WDPA sites. The impact of these offices has been evaluated considering criteria related to the intrinsic characteristics and usage of the buildings, as well as the 'sensitivity' characteristics of the surrounding territory based on the Corine Land Cover mapping. The impact assessment model determines the potential impact level of each branch in order to identify, were necessary, activities to mitigate its potential environmental footprint on biodiversity. 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. 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: high between 20 and 50 years (frequent floods), medium between 100 and 200 years, low over 200 years (low probability of floods or extreme event scenarios). For assets located in other countries, different sources are used provided by CatNet®, a proprietary tool developed by Swiss Re.

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 the landslides that have already occurred, the areas of possible evolution of the phenomena and the areas potentially susceptible to new landslides. Conventionally the areas are classified into 5 classes: very high hazard P4, high P3, medium P2, moderate P1 and AA attention areas.

Regarding lightning risk, the assessment is based on the annual average number of lightning strikes per square kilometer. This data is provided by Swiss Re through the CatNet® tool and the risk scale ranges from Very Low to Extreme, with ten distinct levels.

Another hazard indicator identifies areas most at risk from storm surges, tsunamis, or other coastal flooding waves. This data is generated using a digital elevation model of the terrain and is also derived from the CatNet® tool by Swiss Re.

The platform also considers the exposures of assets to various other climatic and territorial risks. These include wildfires, earthquakes, tornadoes, volcanic activity, cyclones, droughts and heatwaves, major accidents, sea level rise, heavy snowfall, and strong winds. By evaluating these risks, the platform helps to understand and mitigate potential threats to the Bank's properties.

In Italy, out of a total of over 2,600 real estate assets, the results of the assessments currently show that 108 properties are in areas with high flood risk. For landslide risk, 9 properties are in very high-risk areas (P4) and 19 in high-risk areas (P3). Among foreign assets, over 1,000 properties are monitored through the platform, and the monitoring of risks is continuously being enhanced through ongoing developments and refinements. At the moment, 57 foreign assets are in high-risk areas for flooding. Instead, no foreign properties are exposed to high landslide risk, being classified as having low to medium-low risk, likely due to their location predominantly in urban centers. Conversely, regarding lightning risk, the only 4 assets among the monitored properties at very high risk are located outside Italy. For storm surge risk, 113 Italian buildings and 56 foreign buildings are classified as 'high' risk, while the figures for 'medium-high' risk levels include 57 Italian buildings and 6 foreign buildings.

These assessments, together with the daily analysis of Arpa's weather alert bulletins and those of the Department of Civil Protection on critical national and regional issues, enable the Intesa Sanpaolo Group in Italy to implement actions that take into account 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, in order to mitigate and reduce their potential damage, particularly with regard to workers and Stakeholders.

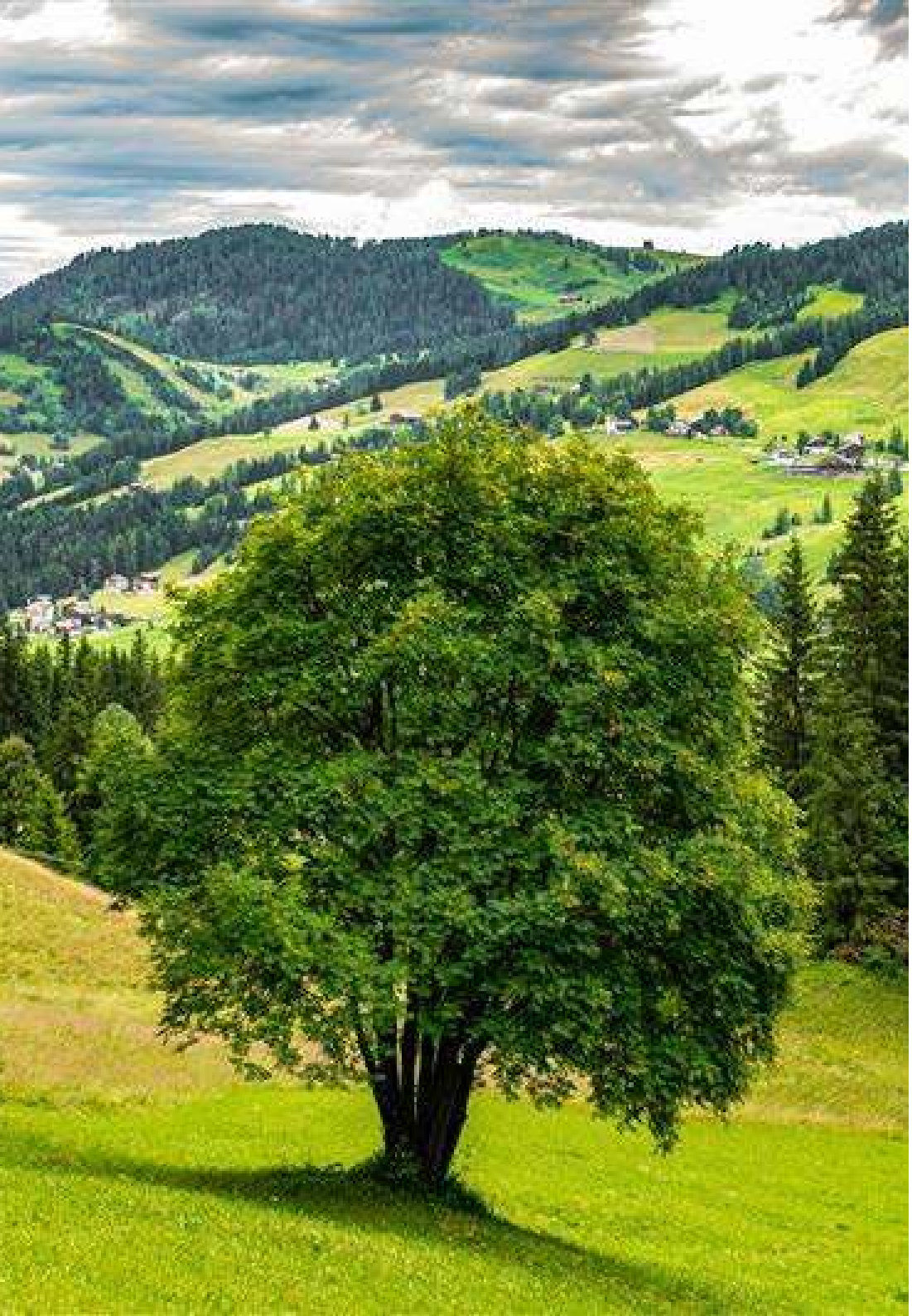
Since 2024, the platform has been in place for the computerised management of emergency events: it automatically generates alerts based on data from bulletins and other sources, such as bulletins of the Department of Civil Protection on critical national and regional issues. The platform provides detailed information about emergency events, including affected assets, historical changes, and related communications and alerts. It supports the management of nine specific event types, such as earthquakes, which can be visualised on a map, allowing for timely communication until the event is resolved. Additionally, the platform allows for the selection of predefined perimeters (e.g., river basins) when creating an event and includes specific mappings, such as the National Emergency Planning Map for the Campi Flegrei area. Moreover, the tide bulletin is periodically consulted on the Venice branches affected by the 'high tide' emergency due to the rise in tide levels, to allow prior notification to the competent structures for the activation of the procedures laid down in the specific Emergency Plans. In these cases, event management is carried out following specific water level alerts set during the creation of the high tide event and it is enabled by the IT platform. Furthermore, the project to update the specific risk analysis based on the implementation of the Mose in the municipality of Venice continued.

In general, with regard to all direct risks related to climate change, in Italy the CEM (Critical Event Management) is activated at the first sign of bad weather. CEM ensures continuous and timely monitoring of the situation and supports the overall coordination of actions agreed with local authorities, in constant connection with the relevant central structures. In the event 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.

In order 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, with particular regard to delays in the transport of valuables and correspondence, difficulties for personnel in reaching their workplaces, operational issues and problems with branch physical plant.

Finally, the Context Analysis of the three schemes of certification for the Environment, Energy, Health and Safety Management Systems, aligned with the international standards ISO 45001, ISO 14001, ISO 50001, also take into account, among others, the risks connected with climate change.



METRICS & TARGETS

This chapter sets out metrics and targets related to initiatives described in the previous Climate Report sections. Reference should therefore be made to those sections for further details on single initiatives.

INTESA SANPAOLO CLIMATE & ENVIRONMENTAL HIGHLIGHTS

Main 2025 Results

KPI	2025 Result	Target
New lending to support the green economy, circular economy and ecological transition (including Mission 2 NRRP)	~€21.1bn disbursed in 2025 (~€89.4bn since 2021[1])	€76bn by 2026 ✓
of which circular economy new lending[2]	~€3.3bn[3] disbursed in 2025 (~€15.9bn[4] in the 2022-2025 period)	€8bn by 2025, in line with 2022-2025 Business Plan horizon ✓
New green lending to individuals[5]	~€6.3bn of Green Mortgages in 2025 (~€15.2bn in the 2022-2025 period)	€12bn by 2025, in line with 2022-2025 Business Plan horizon ✓
ESG financing to SMEs	~€4.3bn of S-Loan disbursed in 2025 (~€11.1bn from launch in July 2020)	
Eurizon 'sustainability-conscious' funds	~€169bn[6] (75.4% of total AuM)	€156bn (60% of total AuM) by 2025, in line with 2022-2025 Business Plan horizon ✓
Eurizon 'sustainability-conscious' products	~€183bn[7] (76% of total AuM)	
Absolute financed emissions[8]	-12% vs 2024	
Coal mining	~€0.01bn[9]	Exclusion policy: zero exposure by 2025 ✓
Own emissions (Scope 1+2 market based)	-39% vs 2019 (-5.6% vs 2024)	Net-Zero in terms of own emissions by 2050 53% reduction in scope 1+2 absolute emissions[10] by 2030
Electricity purchased from renewable sources	~95%	Purchase of 100% of electricity from renewable sources[11] by 2030

1 2021-2025. Starting from 30.06.24 the figure also includes the 2022-2025 cumulative amount of transition finance pertaining to the foreign activities of the Group.
2 Including green and circular criteria.
3 Of which ~€1.6bn related to green criteria.
4 Of which ~€10.7bn related to green criteria.
5 Starting from 30.06.24 the cumulative amount of green mortgages issued by the International Banks Division since 2023 is also included.
6 Eurizon perimeter - funds pursuant to Articles 8 and 9 of SFDR 2019/2088.
7 Eurizon perimeter - funds and AM products pursuant to Articles 8 and 9 of SFDR 2019/2088.
8 Emissions refer to those within the target setting perimeter, as further specified in the 'Target Setting on Lending Activities: Annual Reporting of estimated emissions' section.
9 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.
10 Reduction vs 2019 baseline. Validated 1.5°C aligned by SBTi. Carbon neutrality in 2030.
11 At Group level in 2030, in geographies where possible.

Main Targets included in 2026-2029 Business Plan

KPI	Target	Timeframe
Sustainable lending	30% of total medium to long-term (MLT) new lending[12] over the Business Plan horizon, with a strong focus on social and environmental activities	2026-2029, in line with the Business Plan horizon
Target Setting on lending activites	Net-Zero	By 2050
	Intermediate emissions reduction targets[13]: • Agriculture – Primary Farming • Aluminium • Automotive • Cement • Commercial Real Estate[14] • Iron & Steel • Oil & Gas • Power Generation • Residential Real Estate[14]	By 2030
Asset management portfolio	Confirmed decarbonisation level of Reference Portfolio: ambition -50%[15] Enhancement of strategic levers for engagement and stewardship activities[16] Evolution of Climate Solutions targets[17] (investments in green/sustainability bonds)	By 2030
Insurance portfolio	Confirmed 2030 targets set for Direct Investments (listed equity and publicly traded corporate bonds), with a 50% Carbon Intensity reduction[18] Continuous engagement with the top 20 issuers in the Direct Investments portfolio[19]	By 2030
Own Emissions	Net-Zero in terms of own emissions	By 2050
	53% reduction in scope 1+2 absolute emissions[20] Purchase of 100% of electricity from renewable sources[21]	By 2030

12 Equal to ~€112bn assuming ~€374bn total MLT new lending, of which ~€87bn environmental, governance and other sustainable activities.
13 Targets may be adjusted in relation to the shift in reference scenarios.
14 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.
15 Scope 1 + Scope 2 reduction vs 2019 baseline.
16 Focus on climate change mitigation, biodiversity protection, human rights in supply chains, strengthening of governance practices. Targets: companies to be engaged covering 90% of financed emissions by 2030 in the portfolio in scope.
17 Evolution of Climate Solutions Targets (8% of the Asset Management Division AUM invested in Fixed income).
18 Reduction vs 2021 baseline. Carbon Intensity: tonnes CO_2 e/$mln EVIC (EVIC=Enterprise Value Including Cash).
19 Accounting for about 70% of the relative emissions.
20 Reduction vs 2019 baseline. Validated 1.5°C aligned by SBTi. Carbon neutrality in 2030.
21 At Group level in 2030, in geographies where possible.

OWN OPERATIONS

RESPONSIBLE MANAGEMENT OF RESOURCES

According to the Code of Ethics, the Environmental and Energy Policy and the Rules on Green Banking Procurement, the Group's responsibilities include the close evaluation of the consequences of its activities on ecosystems and the reduction of its environmental footprint. For this reason, the responsible management of resources is a priority issue for the Intesa Sanpaolo Group in its attempts to mitigate its impact on the environment.

CERTIFIED ENVIRONMENTAL AND ENERGY MANAGEMENT SYSTEM

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[22]; 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, hold 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.

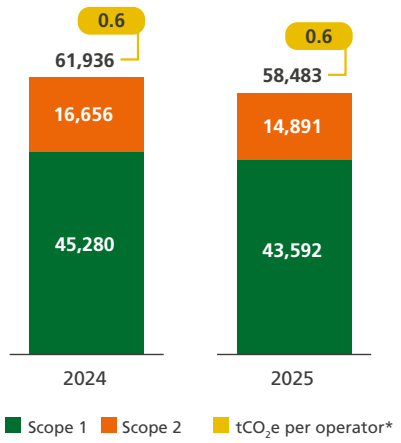
The Review is the key moment of analysis and discussion around the performance, the suitability and the effectiveness of the System in regard to the reference ISO standards and current legislation. The meeting examines the results of the internal audits, System performance indicators, changes in the 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. As of 2023 the results of the Review are also presented to the Steering Committee.

The totals presented in this section may not correspond to the results obtained by performing calculations on the individual figures disclosed, due to rounding adjustments.

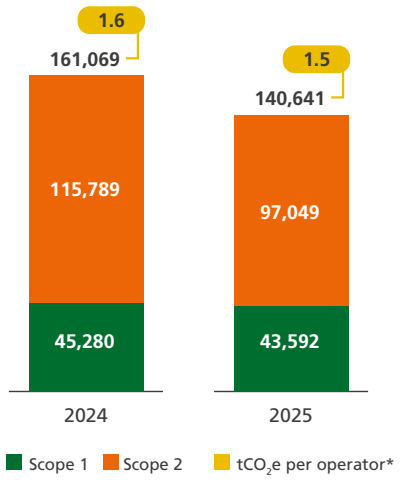
22 For further details on ISO Standards please visit International Organisation for Standardization website.

OWN OPERATIONAL FOOTPRINT

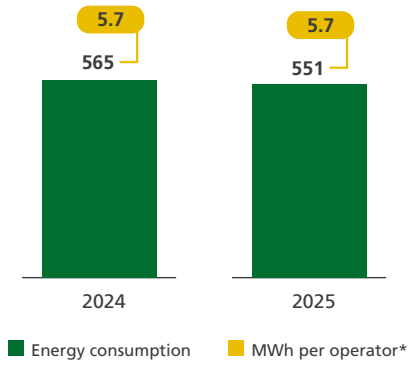
Market Based GHG Emissions (tCO_2e)



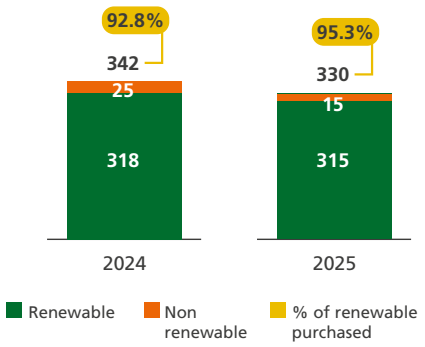
Location Based GHG Emissions (tCO_2e)



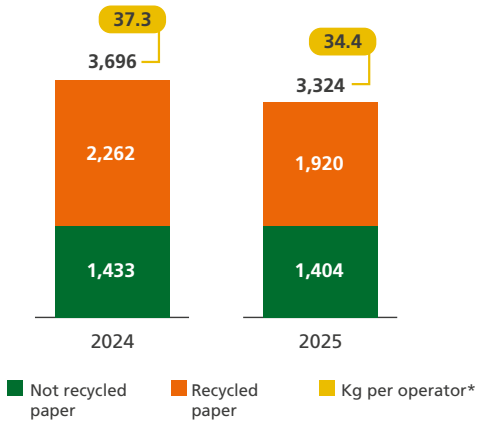
Energy consumption (GWh)



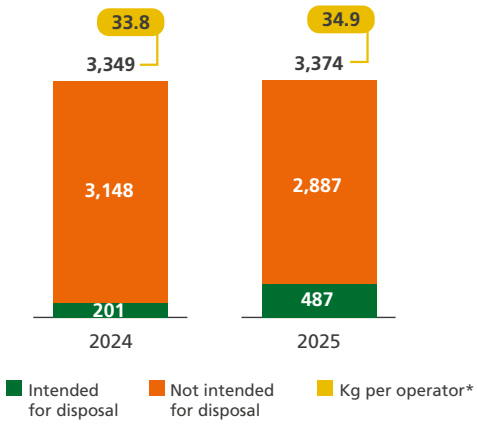
Purchased Electricity (GWh)



Purchased Paper (t)



Generated Waste (t)



* Operators = Staff + external staff with continuous presence. For further details, refer to the 'Parameters' table below

OWN EMISSIONS PLAN

In accordance with the environmental responsibility commitments undertaken by the Group, since 2009 Intesa Sanpaolo has set medium to long-term goals through the creation of specific action plans. The first Intesa Sanpaolo Environmental Plan covered the 2009-2013 period and was followed by the plan relating to 2013-2016 and the 2017-2022 Climate Change Action Plan. All Plans set measurable goals in the areas of energy savings, economic savings and the reduction of CO_2 emissions. The scope, limited to Italy in the first plan, has expanded over time to include the International Banks.

As a demonstration of the strategic relevance of climate change, in 2022, with the 2022-2025 Business Plan, the Bank's commitment to contain CO_2 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. On 27 January 2025, the Group received the validation by SBTi of targets for the reduction of own emissions (Scope 1 + Scope 2) and the Group's financed emissions[23].

The 2030 targets of the Own Emissions Plan

Scope	Base year	% of emissions in scope	Base year emissions covered by target (tCO_2e)	Target year	% reduction target vs base year	2021 result	2022 result	2023 result	2024 result	2025 result
Scope 1+2 (Market-based)	2019	100%	96,192	2030	-53%	-16%	-21%	-28%	-35%	-39%

Renewable sources	Base year	Renewable electricity base year (%)	Target year	Target renewable electricity (%)	2021 result % renewable electricity	2022 result % renewable electricity	2023 result % renewable electricity	2024 result % renewable electricity	2025 result % renewable electricity
Purchasing of electricity from renewable sources	2019	87.7%	2030	100%	87.7%	90.7%	88.2%[24]	92.8%	95.3%

The Own Emissions Plan targets the direct purchase of 100% of electricity from renewable sources at Group level by 2030, where possible across the Group's operating geographies. It is to be noted that in 2025 approximately 95.3% of Group electricity purchases already come directly from renewable sources. This increase is mainly attributable to the greater use of renewable energy within the international perimeter, particularly by Bank of Alexandria in Egypt, Banca Intesa Beograd in Serbia, and CIB Bank in Hungary.

The following section 'Own Operations Indicators' is subject to limited assurance available in the Independent Auditors' Report attached to this Climate disclosure.

23 Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the additional temperature rating targets.
24 The reduction in the purchase of electricity from renewable sources was influenced by the national energy mix of some banks in the foreign perimeter, where the purchase of green energy is restricted by state monopolies, the slight increase in the production of electricity from co-generator in Italy and the numerous energy efficiency initiatives which have at the same time reduced the need for purchased electricity.

OWN OPERATIONS INDICATORS

Parameters and factors

Parameters	Unit	2024	2025
		Group	Group
Operators = Staff + External staff with continuous presence	No	99,082	96,590
Staff	No	93,539	90,789
External staff with continuous presence	No	5,543	5,801
Floor area	thousands of m^2	3,452	3,524

Energy - Emission factors	Unit*	2024	2025
		Group	Group
Electricity - National mix	$kgCO_2e/kWh$	0.315	0.269
Electricity - Residual mix	$kgCO_2e/kWh$	0.444	0.441
Natural gas	$kgCO_2e/m^3$	2.023	2.031
Diesel	$kgCO_2e/l$	2.625	2.654

* $CO_2e = CO_2*GWP + CH_4*GWP + N_2O*GWP$ where GWP = GWP-100 years from IPCC AR6 WGI 2021.

Mobility - Emission factors	Unit*	2024	2025
Company fleet - Gasoline	$kgCO_2e/km$	0.164	0.166
Company fleet - Gasoline Hybrid	$kgCO_2e/km$	0.138	0.138
Company fleet - Plug-in	$kgCO_2e/km$	0.190	0.192
Company fleet - Diesel	$kgCO_2e/km$	0.160	0.159
Company fleet - LPG	$kgCO_2e/km$	0.148	0.148
Personal cars - Gasoline	$kgCO_2e/km$	0.173	0.173
Personal cars - Diesel	$kgCO_2e/km$	0.172	0.172
Train - High speed	$kgCO_2e/km$	0.041	0.041
Train - Other	$kgCO_2e/km$	0.045	0.045
Flights - Domestic	$kgCO_2e/km$	0.109	0.113
Flights - Mix	$kgCO_2e/km$	0.085	0.087
Flights - International	$kgCO_2e/km$	0.058	0.058

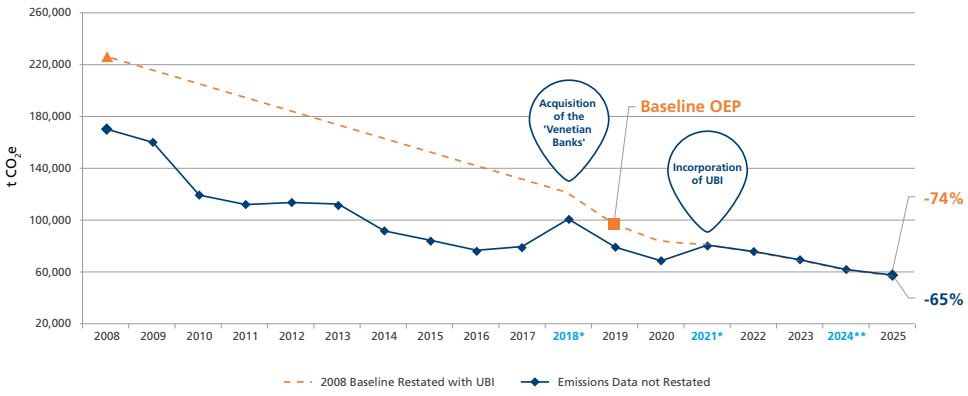
* $CO_2e = CO_2*GWP + CH_4*GWP + N_2O*GWP$ where GWP = GWP-100 years from IPCC AR6 WGI 2021.

GHG Emissions

The Intesa Sanpaolo Group's greenhouse gas emissions, reported in CO_2 equivalent in accordance with the international GHG Protocol (Greenhouse Gas Protocol), relate to: Scope 1 direct emissions, associated with the use of fuel for direct heating, leaks of F-GAS[25] and, use of fuel for the fleet; Scope 2 indirect emissions, related to centralised heating, district heating, and electricity.

As a result of the medium/long-term plans implemented since 2019, the Group achieved a major reductions in electricity and thermal energy consumption, as well as in the resulting emissions, with Scope 1 + Scope 2 Market-based emissions decreasing by -39% in 2025, which corresponds to a reduction of 37,709 tonnes of CO_2e, confirming a trend consistent with the 2030 target. 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. A reduction in Scope 2 Location-based emissions (-16%) should also be reported, confirming not only a reduction in emissions but also in electricity consumption.

Trend in GHG emissions (Scope 1 + Scope 2 Market-based) from 2008 to 2025



* The increase in emissions in the not restarted line recorded in 2018 and 2021 is mainly due to a wider reporting perimeter: Banca Popolare di Vicenza and Veneto Banca figures are included from 2018 while UBI Banca Group figures are included from 2021.
** Change in reporting methodology.

25 Fluorinated gases used as refrigerants in the refrigeration, air conditioning and heat pump sector (e.g., hydrofluorocarbons, HFCs), isolation gases in electricity grid connections (e.g., sulphur hexafluoride, SF6) and in the electronics and pharmaceuticals sectors (e.g., perfluorocarbons, PFCs).

Furthermore, in addition to its Scope 1 and 2 emissions the Intesa Sanpaolo Group is also committed to reporting its indirect Scope 3 emissions which are connected with its activities but not directly controlled by the company (paper, waste, office equipment, etc.).

Greenhouse gas emissions*	Unit	2024	2025
		Group	Group
Gross Scope 1 greenhouse gas emissions	tCO_2e	45,280	43,592
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	-	-
Gross location-based Scope 2 greenhouse gas emissions	tCO_2e	115,789	97,049
Gross market-based Scope 2 greenhouse gas emissions	tCO_2e	16,656	14,891
Scope1+2 - Gross location-based greenhouse gas emissions	tCO_2e	161,069	140,641
Scope1+2 - Gross location-based greenhouse gas emissions per operator	tCO_2e/operator	1.6	1.5
Scope1+2 - Gross market-based greenhouse gas emissions	tCO_2e	61,936	58,483
Scope1+2 - Gross market-based greenhouse gas emissions per operator	tCO_2e/operator	0.6	0.6
Gross Scope 3 greenhouse gas emissions (cat. 1-14):			
1. Purchased goods and services**	tCO_2e	7,179	9,868
2. Capital goods	tCO_2e	6,432	7,257
3. Fuel and energy-related activities	tCO_2e	25,645	23,615
4. Upstream transportation and distribution	tCO_2e	13,161	16,726
5. Waste generated in operations	tCO_2e	254	602
6. Business travel	tCO_2e	5,959	6,330
7. Employee commuting [Italy]	tCO_2e	33,441	35,396
8. Upstream leased assets	tCO_2e	2,419	1,022
9. Downstream transportation	tCO_2e	-	-
10. Processing of sold products	tCO_2e	-	-
11. Use of sold products	tCO_2e	239	256
12. End-of-life treatment of sold products	tCO_2e	-	-
13. Downstream leased assets	tCO_2e	3,489	2,708
14. Franchises	tCO_2e	-	-

* For details on financed emissions, please refer to the section below entitled 'Target Setting on Lending Activities: Annual Reporting of Estimated Emissions'.

** 2025 data include, in addition to emissions from paper purchases and the use of cloud computing, also emissions from water and toner cartridge that were not calculated in 2024. With reference to the emissions due to the purchase of paper (4,296,47 tCO_2) a decrease of paper emissions (-8%) is in line with the reduction of use of paper.

With reference to Scope 3 emissions, in 2025 several categories show a different trend compared to the previous year. In particular, an increase is observed in Category 1 – Purchased goods and services (+37.5%) and Category 4 – Upstream transportation and distribution (+27.1%), largely due to changes in the reporting perimeter and/or in the methodologies applied, the details of which are described later in the methodological section.

Conversely, for Category 8 – Upstream leased assets (-57.8%) and Category 13 – Downstream leased assets (-22.4%), a significant reduction is recorded. This reduction is mainly attributable to the lower number of leased assets, as well as to the change in the emissions calculation methodology adopted, the details of which are described later in the methodological section.

Moreover, the increase recorded for Category 5 – Waste generated in operations (+137%), despite an input figure that is generally stable, is mainly connected to the update of the emission factors.

INTERNAL CARBON PRICING

Internal Carbon Pricing (ICP) is a tool through which a company assigns a monetary value to GHG emissions and integrates this value (referred to as the price) into investment decisions and business operations.

Specifically, the adoption of an Internal Carbon Pricing system leverages market mechanisms and transfers the cost of GHG emissions to the emitter by assigning a price to carbon dioxide emissions.

The implementation of an internal carbon pricing system by the Group represents a strategic decision aimed at managing climate-related company risks and promoting a transition towards a zero-emission business model.

The type of scheme employed by the Group to set the internal carbon price, hereinafter referred to as the 'ICP scheme', is based on the shadow price and applies to Green Banking Procurement, particularly IT equipment purchases. In fact, the ICP is applied to all procurement activities related to Information and Communication Technologies (ICT), which are managed centrally in accordance with the Group's purchasing policy. In residual cases (e.g., specific geographical areas), specific purchases may occur outside centralised procurement; in such cases, the ICP does not apply.

Accordingly, the internal carbon price is applied to GHG emissions generated by electricity consumption from IT equipment, based on product certifications (e.g., Energy Star) and/or supplier declarations. The resulting cost is added to the purchase and usage (energy) costs, contributing to the total lifecycle cost of the machines. This assessment supports Intesa Sanpaolo in selecting the most advantageous supply option from a lifecycle perspective. The main categories[26] of tools to which ICP is applied, with reference to the entire Group perimeter, include:

- Laptops: 78%
- Mini-desktops: 15%
- Cash-in cash-out machines: 99%
- ATMs/MTAs: 41%
- Monitors: 86%
- Printers: 15%
- Scanner: 89%

The price-setting mechanism applies to environmental impact analysis through a technical assessment of the equipment, including an evaluation of energy consumption and environmental characteristics.

In 2019, the internal carbon price was set at €57/tCO_2e, based on the Life Cycle Impact Assessment Environmental Prices method (EU28 2018 version), which calculates the carbon footprint over the entire product lifecycle in line with market practices. By 2023, the ICP had risen to €100/tCO_2e, a significantly higher value than the €64/tCO_2e indicated by the Network for Greening the Financial System (NGFS), aligning with the recommendation to increase internal prices in pursuit of the 1.5°C goal and falling within the €50 - 160/tCO_2e range proposed by the Life Cycle Impact Assessment (LCIA) Environmental Prices. 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.

It is noted that the ICP is determined based on an external study.

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 tCO_2e in 2025. The percentage of Scope 2 GHG emissions covered by the ICP scheme relative to total Scope 2 Location-Based GHG emissions is 3.09%.

Application of the Shadow Price

	Affected Volume (tCO_2e)	Applied Prices (€/tCO_2e)	GHG Scope 2 [%]
Shadow Price CapEx	3,000	100	3.09%

Other emissions

Emissions of other gases which are harmful to the ozone layer (NOx, SO_2) – Scope 1 and 2	Unit	2024	2025
		Group	Group
NOx emissions	t	35	32
SO_2 emissions	t	11	8

26 Within the Italy-only perimeter, these percentages amount to: laptops 87%, mini-desktops 100%, cash in–cash out machines 100%, ATMs/MTAs 100%, monitors 100%, printers 17%, and scanners 100%.

Energy Consumption

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.

Energy consumption and mix	Unit	2024	2025
		Group	Group
Total energy consumption	**MWh**	**565,284**	**550,853**
Total energy consumption per operator	MWh/operator	5.7	5.7
Total fossil energy consumption	**MWh**	**233,889**	**229,189**
Fuel consumption from coal and coal products	MWh	-	-
Fuel consumption from crude oil and petroleum products	MWh	36,475	35,091
Fuel consumption from natural gas	MWh	136,694	136,550
Fuel consumption from other fossil sources	MWh	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	MWh	60,719	57,548
Share of fossil sources in total energy consumption	%	41.4	41.6
Consumption from nuclear sources	**MWh**	**4,661**	**108**
Share of consumption from nuclear sources in total energy consumption	%	0.8	0
Total renewable energy consumption	**MWh**	**326,735**	**321,556**
Fuel consumption from renewable sources	MWh	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	MWh	325,382	320,130
Consumption of self-generated non-fuel renewable energy	MWh	1,353	1,427
Share of renewable sources in total energy consumption	%	57.8	58.4
Non-renewable energy production*	MWh	23,539	23,817
Renewable energy production	MWh	1,353	1,516
Total energy consumption from activities in high climate impact sectors**	MWh	1,081	445
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors***	MWh/€	0.00002	0.000004

* The supply of energy for the Parma Data Center is provided by a trigeneration plant powered by natural gas. The plant guarantees high standards of reliability and operational continuity for a strategic site of the Bank. Inside a Data Center, there is a need to air condition the IT rooms 365 days a year, 24 hours a day, in order to guarantee the correct functioning of all the IT equipment contained therein as well as to guarantee winter heating for the offices in which the Bank's employees work.
In 2025, compared to a gas consumption of 5.8 million of m³, 23.8 GWh of electricity and 16.9 GWh of heat energy were fully recovered and self- consumed.

** It should be noted that high climate impact sectors are those listed in Sections A to H and Section L of the Statistical Classification of Economic Activities (NACE), as defined in Commission Delegated Regulation (EU) 2022/1288. Only a limited number of Group companies operate in the sectors covered by Section F - Construction, Section G - Wholesale and Retail Trade and Section L - Real Estate Activities.
Therefore, under the item 'Total energy consumption from activities in high climate impact sectors', the Group reports total energy consumption, including energy from fossil sources, nuclear sources and renewable sources, attributable to its activities in these sectors.

*** The item 'Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors' is calculated using the following formula: Total energy consumption from activities in high climate impact sectors (MWh)/Net revenue from activities in high climate impact sectors (EUR), where the numerator represents the aforementioned energy consumption and the denominator reflects the net revenue attributable to activities in the high climate impact sectors listed above.

Electricity focus

Total electricity focus (including trigeneration)	Unit	2024	2025
		Group	Group
Total electricity consumed	**MWh**	**367,367**	**355,567**
Electricity per operator	kWh/operator	3,708	3,681
Electricity purchased	MWh	342,476	330,323
of which renewable	%	92.8	95.3
Electricity self-produced	MWh	24,892	25,333
of which renewable	%	5.4	6.0

Energy efficiency and consumption optimisation

The drafting of the Own Emissions Plan accelerated various long-standing Group initiatives aimed at reducing energy consumption. More specifically, in Italy a number of projects to change boilers heated with natural gas or diesel were completed in 2025, involving an investment of about 3.6 million euro, with estimated annual natural gas savings of about 310,000 m^3 and about 12,000 litres of diesel and a potential annual reduction in CO_2 emissions of 665 tonnes.

Another important initiative in Italy is the Smart Building project. Launched by Intesa Sanpaolo in 2019, it aims to develop an intelligent and sustainable approach to managing the Group's real estate assets. By adopting advanced technologies such as IoT, Digital Twin, machine learning and generative AI, the project helps to improve energy efficiency, space usage and overall user comfort. Starting in 2024, a structural component for monitoring the occupancy of main buildings was introduced, integrated into the Smart Building platform. The platform continues to collect data on energy consumption, plant operation, and space occupancy in an integrated manner, enabling timely analysis and the ability to implement continuous improvement actions in building and service management. The cloud platform enables real-time monitoring, advanced analytics and continuous optimisation of operations. As of 2025, the project has involved 70 large buildings and the first extensions to branches have been launched, with the aim of progressively scaling up the adoption of the model. This process, together with energy-saving interventions on the plants, has allowed for an overall reduction in consumption of electricity of 20% compared to 2019, equivalent to 40 GWh.

2025 EFFICIENCY MEASURES

Some examples of other efficiency measures carried out in 2025 are outlined below.

INTESA SANPAOLO

Headquarter in Firenze Novoli

Energy retrofitting of the entire building, replacing air conditioning, decarbonising, replacing the new power plant regulation system, and installing a photovoltaic system on the roofs.

The intervention will allow the improvement of at least 2 energy classes on the Energy Performance Certificate.

Overall, the measures adopted in Firenze, with an investment of about €3mln, will lead to estimated gas savings of 105,000 m^3/year.

Intesa Sanpaolo Bank (Slovenia)

In the Headquarter of Koper, the Bank gradually began replacing old windows on the same floor of the building with new ones, in order to reduce heat loss and lower heating consumption. This activity will lead to estimated annual energy savings of around 1000 litres of diesel in winter and 36,000 kWh of electricity in the summer period.

Bank of Alexandria

In line with the Bank's commitment to energy efficiency, Bank of Alexandria has replaced more than 273 low efficiency old air conditioning (AC) systems with newer technology and hydrofluorocarbons (HFCs) lower emissions in 61 branches and in the warehouse. This measure is expected to produce annual energy savings of around 820,000 kWh of electricity and a reduction in HFCs leaks.

Banca Intesa AD Beograd

In 2025, the Bank completed the installation of a photovoltaic plants on the roof of a branch in Novi Sad and started the implementation of a new one at the Headquarter in Beograd. This activity will lead to estimated annual energy savings of around 207,000 kWh of electricity.

Consumption and production of renewable energy

In addition to the energy efficiency measures aimed at reducing its environmental impact, the Intesa Sanpaolo Group has committed, where possible, to producing electricity (totally self-consumed) through the installation of photovoltaic plants and to purchasing electricity from renewable sources.

In 2025 the Intesa Sanpaolo Group in Italy, Croatia, Slovakia and Moldova self- produced and self-consumed 1,427 MWh of electricity, saving around €468,000 on the purchase of electricity and avoiding 714 tonnes of CO_2 emissions. Moreover, it should be noted that in Serbia, Slovenia, Croatia and Moldova they have self-produced 89 MWh of additional electricity sold to the grid.

Additionally, starting from 2024, Intesa Sanpaolo has signed two Power Purchase Agreement (PPA) for the procurement of around 50 GWh from new dedicated photovoltaic plants in Italy. CIB Bank also signed a five-year PPA agreement in July 2024 for the procurement of its electricity demand in Hungary from photovoltaic plants (which in 2025 covered the 27% of electricity consumption).

The commitment of some foreign banks to increase their quantity of green energy should be noted: in addition to the Egyptian subsidiary Bank of Alexandria which, thanks to the purchase of i-RECs certificates, has now reached 100% of its green energy purchases, the Hungarian CIB Bank and the Serbian Banca Intesa Beograd have also achieved, not considering electricity for the fleet, 100% of use of green energy in their supplies.

Paper

Paper consumption	Unit	2024	2025
		Group	Group
Purchased paper	**t**	**3,696**	**3,324**
Purchased paper / operator	kg/operator	37.3	34.4
Certified recycled paper	%	61.2	57.8
Eco-sustainable certified paper (not recycled)	%	29.9	32.5
Traditional (not recycled)	%	8.9	9.8

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 CO_2 avoided and a theoretical cost saving of around €5.4mln.

In Italy, throughout 2025, the paperless project was extended to insurance products and services, using the graphometric or digital remote signatures for the signing of contractual documents, eliminating paper-based operations and improving the efficiency. More specifically, this initiative includes:

- new Business Manufacture policy, which offers insurance protection for production, processing, maintenance, and installation activities, including sales in the event of damaging events;
- new policy to cover risks related to natural catastrophes, which will be available in both the On-Site Offer and Remote Offer.

Among the materialization measures supporting paper savings, a further initiative, the POS Transacted Advance product, was implemented in 2025 allowing customers to manage the expenses of their business with ease through the activation of a credit line that increases the company's liquidity.

In line with the ongoing digitalisation initiatives for HR systems and services undertaken in recent years, the dematerialisation has been extended to the Loyalty Plan for Private Bankers employed by the Intesa Sanpaolo Private Banking Network. This is a specific performance-related multi-year retention plan aimed at strengthening resource loyalty. Additionally, the digitalisation of the process for the 'initiatives in favour of Group employees' children with disabilities', provided by the mutual aid company – Third Sector Entity, continued. The paperless project progressed in 2025 within the Intesa Sanpaolo International Branches, as in the case of the Warsaw Branch, through initiatives that restrict system printing and introduce the use of digital forms for the authorisation of transactions. The digital transformation process also continued in 2025 within the International Banks Division, as in the case of Intesa Sanpaolo Bank Albania, through the implementation of Remote Digital Signatures, and of Alexbank, through the Instant Payment Network (IPN) Launch. The INSTAPAY application enables customers in Egypt to connect all their bank accounts from different banks in a single platform, allowing instant transfers 24/7 and credit cards settlement.

Stationery

Regarding eco-sustainable stationery, the application of Rules on Green Banking Procurement has initiated a virtuous process of purchasing low-environmental-impact materials throughout the Group. In 2025, the eco-friendly stationery purchases reached approximately 63.0 tonnes of sustainable office supplies, including 59.2 tonnes of paper-based materials (notebooks, post-its, folders, etc.), 3.0 tonnes of ballpoint pens and the remaining weight consisting of highlighters, recycled-material stamps and office supplies containing sustainable wood.

Toner

Toner consumption	Unit	2024	2025
		Group	Group
Toner: total	**Kg**	**74,069**	**70,776**
Toner: remanufactured cartridges	%	57.9	45.4
Toner: traditional cartridges	%	42.1	54.6

The toner consumption decreased by -4.44% in line with the reduction in paper consumption.

Water

Water consumption	Unit	2024	2025
		Group	Group
Total water consumed	thousands of m^3 (ML)	2,129	1,861
Total water consumed / operator	m^3/operator	21.5	19.3

The Intesa Sanpaolo Group's consumption of drinking water from the network is predominantly connected with sanitation purposes and, to a much lesser extent, the generation of cold air for air conditioning. In 2025 the Group's per capita water consumption was 19.3 cubic meters per operator, showing a decrease compared to 2024.

Waste Management

Special waste by type	Unit	2024	2025
		Group	Group
Total waste	**t**	**3,349**	**3,374**
Total waste / operator	kg/operator	33.8	34.9
Total waste not intended for disposal*	**t**	**3,148**	**2,887**
Paper and cardboard	t	1,740	1,508
Cartridges, ribbons and films	t	44	32
Office machinery	t	1,165	1,218
Monitors	t	69	52
Other types	t	130	77
Total waste intended for disposal*	**t**	**201**	**487**
Paper and cardboard	t	13	183
Cartridges, ribbons and films	t	27	26
Office machinery	t	112	142
Monitors	t	26	71
Other types	t	23	65

* All waste operations are carried out at an external site.

Special waste not intended for disposal*	Unit	2024	2025
		Group	Group
Total non hazardous waste	**t**	**3,041**	**2,818**
Recycling	t	1,781	1,550
Reuse/recovery	t	1,254	1,269
Preparation for reuse	t	3	0
Other recovery operations	t	4	0
Total hazardous waste	**t**	**107**	**69**
Recycling	t	0	0
Reuse/recovery	t	107	69
Preparation for reuse	t	0	0
Other recovery operations	t	0	0

* All waste operations are carried out at an external site.

Special waste intended for disposal*	Unit	2024	2025
		Group	Group
Total non hazardous waste	**t**	**175**	**399**
Landfill	t	116	245
Incineration with energy recovery	t	17	16
Incineration without energy recovery	t	36	129
Other disposal operations	t	6	10
Total hazardous waste	**t**	**26**	**88**
Landfill	t	24	32
Incineration with energy recovery	t	0	1
Incineration without energy recovery	t	1	55
Other disposal operations	t	0	0

* All waste operations are carried out at an external site.

The management of Intesa Sanpaolo Group waste, including collection, transportation, recovery and disposal at external sites, is overseen by third parties in accordance with all the relevant legislation in force. In 2025, total waste volumes remained essentially unchanged, although showing a slight increase (0.76%) compared to the previous year. This increase is mainly due to hazardous waste (+17.9%), resulting primarily from the disposal of obsolete and no longer usable office machines, or following disposals of ownership. Notably, paper and toner waste decreased, reflecting reduced purchases of these materials. In Italy only 6% of the waste generated is sent for disposal (4.1% of which is disposed of in landfills), while over 94% is prepared for reuse, recovery or recycling. At Group level, the data is higher (14%), largely driven by some non-European countries where a very high proportion of waste is disposed of rather than recovered.

Environmental Monitoring and Hazardous Substances Management

As part of its ethical and legal responsibilities, the Intesa Sanpaolo Group pays particular attention on environmental monitoring and the management of hazardous substances for the environment, also with regard to the physical safety of employees and other staff and the healthiness of working environments. In 2025, Health and Safety continued to manage specific measurement campaigns in Italy on the various environmental compartments: asbestos and man-made vitreous fibres, noise, radon, electromagnetism, water and air. The assessment of the environmental data obtained from the monitoring campaigns verified compliance with all regulatory limitations in force and made it possible to plan all necessary prevention and protection measures. With regard to radon and asbestos, Health and Safety evaluated the specific risk for all workplaces in accordance with the relative industry regulations, where necessary appointing expert consultants for the issues under examination. As part of the implementation of the management system for the prevention and control of infectious diseases adopted by Intesa Sanpaolo, in 2025 the monitoring activities to assess the microbiological quality of the indoor air and water in workplaces continued in Italy. The results of the air quality surveys were satisfactory: on average, the level of internal microbial contamination was lower than that in the external environment, confirming that the air treatment and ventilation systems guarantee the consistently high quality of the indoor air. Similar observations were made with the main chemical-physical parameters such as VOC/CO_2/CO/HCHO, always at appropriate levels and in lower concentrations compared with the external environment. In regard to legionella, all phases of the process designed to control and prevent the risk of infection, including the management of any case of non-compliance and subsequent corrective actions, were carried out. In addition, Health and Safety continued to develop trial air treatment projects in Italy which should further improve the quality of indoor air, both from a chemical-physical perspective and in microbiological terms.

Furthermore, in order to reduce environmental risk, contracts for building services and for the personnel performing such services include explicit prohibitions on the use of certain toxic and/or corrosive substances and products. Suppliers or manufacturers of chemical agents are also required to provide all the information necessary for a complete risk assessment, in particular the European standardised Safety Data Sheet, which is examined in collaboration with the Company Doctor.

Mobility Management

Transport

Transport	Unit	2024	2025
		Group	Group
Total transport	**thousands of km**	**131,347**	**131,382**
Company fleet	thousands of km	61,263	58,400
Air travel	thousands of km	23,618	29,671
Train travel	thousands of km	31,427	29,075
Personal cars	thousands of km	15,040	14,235

Within the initiatives dedicated to supporting employee commuting to improve their quality but also to promote sustainable means of transport, engaging with the Group's people is a fundamental element in proposing a comprehensive range of options for daily travel. For this reason, at the end of 2025 a new questionnaire was proposed (55% redemption) dedicated to the mobility of people working in the main Italian cities (in compliance with current regulations). This initiative aims to better understand the mobility needs of the workforce and ensure alignment of projects and services designed to reduce the use of private individual transport and associated CO_2 emissions.

The main projects and services that the Group makes available in Italy in order to reduce the use of individual private means of transport and the related CO_2 emissions are: consolidation of smart working (120/140 days/year), 4x9 short week and flexible working hours; company platform for the facilitated purchase of local public transport season tickets (2,466 subscribed in 2025); company shuttle service (10 lines in 4 cities in 2025); development of sharing services (2 partner operators); incentive for light mobility with the installation of racks for protected bike parking and the possibility of storing foldable bikes and/or scooters within the company spaces.

As part of the International Banks Division's efforts to reduce emissions, the majority of the Banks (seven out of eleven) has activated plans to change the company fleet composition, progressively switching from internal combustion vehicles to hybrid and electric cars, meanwhile continuing to promote existing green transportation initiatives, supporting the reduction of business travel emissions in 2025. For example, at CIB Bank (Hungary), GreenGo, a carsharing company operating community electric cars, continues to be available to all employees in 2025, resulting in a total of 7,427 km travelled within Budapest. Since September 2024, electric bicycles have also been introduced for branches located in rural areas. At PBZ (Croatia), electric vehicle car sharing has replaced taxi services and pool cars, with all charging powered by green energy from renewable sources. In addition, at Bank of Alexandria (Egypt), commuting is facilitated through shuttle services used by around 500 colleagues. Regarding taxi services, at CIB Bank (Hungary), in line with specific rules issued by the Bank, approximately 95% of business trips by taxis are conducted using electric or hybrid vehicles and, at Intesa Sanpaolo Bank Albania, local business travel is carried out exclusively with electric vehicles under the Bank's taxi service contract.

Within the Intesa Sanpaolo International Branches, at the Shanghai branch, in 2025 over 70% of business trip taxis are made using electric or hybrid vehicles and the Istanbul branch continues to promote the use of local public transportation to all its staff.

Furthermore, within the Private Banking division, Reyl & Cie financially supports employee commuting through the purchase of annual public transport subscriptions. In 2025, the company covered the cost of these subscriptions for over 140 employees.

METHODOLOGY: OWN EMISSIONS

The Group has defined a structured set of principles and methodological criteria for the measurement and reporting of its own emissions. The key methodological elements that are useful for understanding the indicators presented in the 'Own Operations Indicators' section are set out below.

1. DEFINITION OF THE METRICS IN SCOPE

The Group measures and reports the effectiveness of its policies relating to climate change mitigation in its operational activities through specific metrics, thereby contributing to the achievement of its greenhouse gas emission reduction targets.

The Intesa Sanpaolo Group's greenhouse gas emissions are reported in accordance with the GHG Protocol Corporate Standard (Greenhouse Gas Protocol) and in line with the Italian Banking Association (ABI) Guidelines[27], and relate to:

- Scope 1 direct emissions, include direct emissions from sources owned or controlled by the company, including emissions from stationary combustion (e.g., independent heating of buildings), mobile combustion (e.g., company car fleet) and fugitive emissions;
- Scope 2 indirect emissions, related to indirect greenhouse gas emissions from purchased or acquired energy carriers, such as electricity, steam, heat or cooling, generated outside the perimeter and consumed by the company, calculated according to the two methods, Location-based and Market-based, as defined by the GHG Protocol;
- Scope 3 indirect emissions[28], include all other indirect emissions related to the company's activities that do not fall within Scope 1 and Scope 2, i.e., emission sources originating from the value chain, classified as Upstream and Downstream, and which are not under the Group's operational control.

2. DEFINITION OF THE METHODS AND METRICS

The reporting boundary of the 2025 Climate Report was extended and includes all entities fully consolidated in the 2025 Financial Statement. Starting from the financial consolidated perimeter, the Group has defined its GHG inventory by accounting for 100% of emissions from operations under its operational control, regardless of its ownership interest (relevant for leased assets). The Group's choice prioritises operational control in order to ensure consistency with its governance model and with the direct responsibility for pursuing greenhouse gas emission reduction targets.

In preparing the disclosure for Scope 1, 2 and 3 (excluding financed emissions), the Intesa Sanpaolo Group calculated the emission factors on a country-by-country basis in order to obtain a picture as realistic as possible with respect to the actual emissions generated directly by the Group, in particular for Scope 1 and 2. Each emission factor, multiplied by the respective consumption, generates CO_2e emissions.

In general, the reporting methodologies envisaged by the Italian Banking Association (ABI) Guidelines are applied.

Specifically, with respect to electricity:

- in terms of 'residual mix' (to be used when calculating market-based emissions), the Association of Issuing Bodies (AIB) is the source of emission factors. Where this is not available, the 'national mix' is considered;
- in terms of 'national mix' (to be used when calculating location-based emissions):
  - for Italy, the Italian Institute for Environmental Protection and Research (ISPRA, Istituto Superiore per la Protezione e la Ricerca Ambientale) is the source of emission factors;
  - for the rest of the countries, excluding the US, the International Energy Agency (IEA) is the source of emission factors;
  - for the US, the Environmental Protection Agency (EPA) is the source of emission factors.

27 Reference is made to the ABI Lab (2025) 'Supporting document for sustainability reporting in accordance with the European Sustainability Reporting Standards (ESRS) on environmental matters – Focus on disclosure requirements E1-5 and E1-6'.
28 Financed emissions are excluded, as they fall outside the scope considered. For further details on financed emissions, please refer to the 'Target Setting on Lending Activities: Annual Reporting of Estimated Emissions' section.

With respect to fossil fuels (in particular natural gas, gas oil and LPG):

- for Italy, ISPRA is the source of emission factors;
- for the rest of the countries, excluding the US, the emission factors are calculated using the data collected by the UNFCCC – United Nations Framework Convention on Climate Change. Where these are not available, the average value of the countries considered is assigned;
- for the US, the EPA is the source of emission factors.

With respect to district heating:

- for Italy, where available, the emission factors reported by the various suppliers were considered, collecting the necessary evidence;
- for the US, the EPA is the source of emission factors;
- for the UK, the Department for Energy Security and Net Zero (DESNZ) of the UK Government is the source of emission factors;
- for the rest of the countries, an average value between that of ISPRA, EPA and DESNZ was considered.

With respect to mobility:

- for the car fleet, ISPRA is the source of emission factors;
- for rail transport, Eco Passenger is the source of emission factors;
- for air transport, the International Civil Aviation Organisation (ICAO) is the source of emission factors.

Finally, with respect to the Global Warming Potential (GWP) values, the Intergovernmental Panel on Climate Change (IPCC) (Assessment Report) is the reference source.

The emission sources accounted for, within the operational control boundary, are categorised as follows:

2.1 GHG – Scope 1

Scope 1 includes emissions arising from:

- Natural gas for independent heating and trigeneration;
- Diesel for independent heating and generator sets;
- LPG for independent heating;
- Coal fuel and coal products;
- Fuels from other fossil sources;
- Petrol for car fleet;
- Petrol for full hybrid car fleet;
- Petrol for plug-in hybrid car fleet;
- Diesel for car fleet;
- LPG for car fleet;
- HFC gas leaks from air-conditioning equipment.

For further details on the sources of the emission factors adopted, please refer to the 'Definition of the Methods and Metrics' section.

2.2 GHG – Scope 2

Scope 2 includes emissions generated by the consumption of:

- Electricity from renewable sources;
- Electricity from fossil sources;
- Electricity from nuclear sources;
- District heating from renewable sources;
- District heating from fossil fuels;
- Natural gas for central heating;
- Diesel for central heating;
- LPG for central heating.

With respect to electricity purchased from fossil sources, the country-specific emission factor of the country where the company's instrumental buildings are located is applied.

For emissions reporting according to the Market-based approach, emissions are calculated taking into account the contractually agreed contribution of guaranteed renewable energy certificates, which therefore have zero emissions. Therefore, the emission factor to be identified is the Residual Mix, which represents the mix of electricity generation quotas remaining after taking into account the use of specific energy source tracking systems, such as Guarantee of Origin certificates. For emissions reporting according to the Location-based approach, the National Mix emission factors are applied. This method highlights the actual reduction in emissions resulting from energy efficiency measures, without considering the positive contribution resulting from the purchase of certified renewable energy (Market-based method).

For further details on the sources of the emission factors adopted, please refer to the 'Definition of the Methods and Metrics' section.

2.3 GHG – Scope 3 (cat.1 - 14)

With respect to Scope 3, the emission categories considered significant for measurement and reporting purposes, and the related emission factors applied, are set out below:

- Category 1 - Purchased goods and services. Purchased 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 other processes included in the system boundaries, GHG emission factors have been sourced from Ecoinvent 3.11;
  - the use of cloud-based data centre services. Scope 1, 2 and 3 annual emissions reported by suppliers, in relation to the services provided to the Group, are considered;
  - toners used in the Group's printing operations. The processes considered are those from production to delivery to the Bank. GHG emission factors have been sourced from Ecoinvent 3.11;
  - water consumption in the Group's activities. Emissions were calculated by applying an emission factor derived from the dataset of the UK Government's Department for Energy Security and Net Zero (DESNZ); the final treatment and purification stages are not included.
- Category 2 - Capital goods. 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 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.
- Category 3 - Fuel and energy related activities. 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'. For 2025, emission factors were sourced from various references, namely the International Energy Agency (IEA) for average mixes and the Association of Issuing Bodies (AIB) for residual mixes, and from Ecoinvent 3.11 datasets, with the exception of the national energy mix sourced from Ecoinvent 3.12. The IPCC 2021 equivalence factors have been applied.
- Category 4 - Upstream transportation and distribution. With respect to upstream transport and distribution, the emissions generated by the transport of cash to replenish ATMs by third-party companies on behalf of the Group were considered. The system was modelled using a representative sample of replenishment operations with different vehicle types and the related distances travelled. Emissions cover all stages of the life cycle: fuel supply chain, combustion emissions and vehicle manufacture. Ecoinvent 3.11 emission factors were used.
- Category 5 - Waste generated in operations. Waste-related emissions include the end-of-life treatment of special waste generated by 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 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, representative Ecoinvent 3.11 emission factors were used. The IPCC 2021 equivalence factors have been applied.
- Category 6 - Business travel. 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 coefficients derived from the ICAO Carbon Emission Calculator, the Eco-Passenger application and ISPRA's National Information System.
- Category 7 - Employee commuting. For Italy, emissions due to employees' commuting are calculated using the data obtained from specific questionnaires sent to employees based in the cities covered by Commuting Plans (home-to-work travel plans) and subsequently recalculated 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.

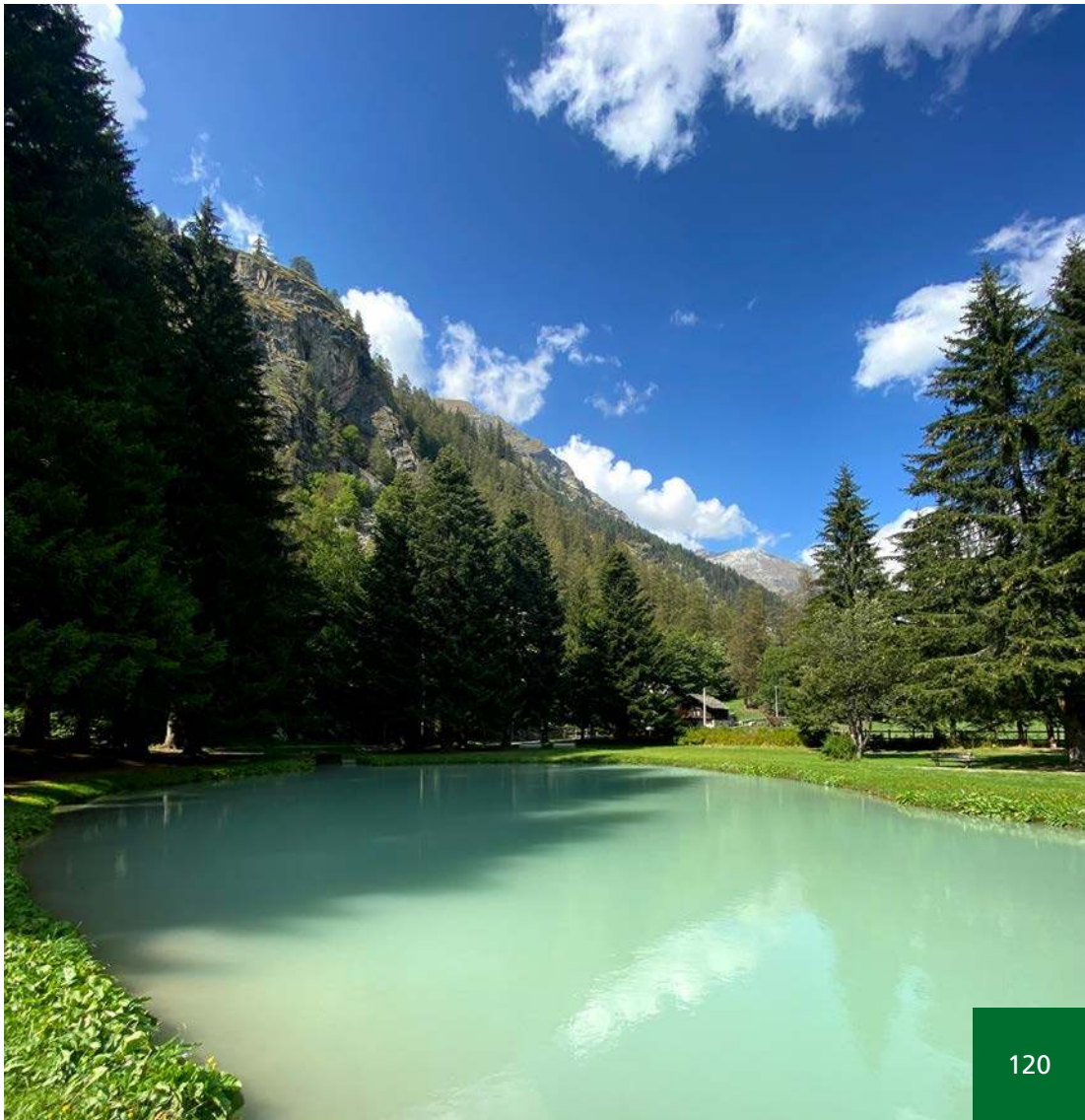
- Category 8 - Upstream leased assets. The Intesa Sanpaolo Group has non-core buildings leased from third parties. For this type of asset, in 2025 the Group adopted a specific methodology consistent with the actual intended use of the properties and using specific factors related to the residential sector. In particular, the methodology applied to calculate 2025 emissions uses CO_2e/m^2 emission intensity factors specific to residential-use properties sourced from the pathway of the Carbon Risk Real Estate Monitor (CRREM) foundation, with reference to multi-family residential buildings.
- Category 11 - Use of sold products. With respect to the banking/financial services/products used by customers, the most significant transactions were considered, broken down by channel used (internet banking/mobile banking) and by 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.
- Category 13 - Downstream leased assets. The Intesa Sanpaolo Group has owned buildings that are not part of the Group's core business (properties classified in accordance with IAS 40) for which no operational control exists, an approach duly reflected in the reporting. In 2025, emission intensity factors were sourced from the pathway of the Carbon Risk Real Estate Monitor (CRREM) foundation, with reference, in this case, to 'office' buildings.

Scope 3 emissions related to the following categories were excluded from measurement and reporting, as they are not material:

- Category 9 - Downstream transportation and distribution, as the Intesa Sanpaolo Group does not produce goods that require transport and distribution;
- Category 10 - Processing of sold products, as there are no intermediate products that require further processing, transformation or inclusion in another product before use;
- Category 12 - End-of-life treatment of sold products, as the Intesa Sanpaolo Group does not produce goods that require end-of-life treatment;
- Category 14 - Franchises, as the Group does not grant third party companies licenses to sell or distribute its services.

For further details on the sources of the emission factors adopted, please refer to the 'Definition of the Methods and Metrics' section.

Given that certain input data may relate to multiple companies located in the same buildings and, at present, it is not possible to allocate such data upstream to the individual companies, for several years a process has been in place to proportionally allocate these data on the basis of headcount.



TARGET SETTING ON LENDING ACTIVITIES: ANNUAL REPORTING OF ESTIMATED EMISSIONS

■ EXECUTIVE SUMMARY
■ ANALYSIS BY SECTOR
■ METHODOLOGY: TARGET SETTING ON LENDING ACTIVITIES

EXECUTIVE SUMMARY

Intesa Sanpaolo completed the definition of 2030 decarbonisation targets 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. This commitment reflects the Bank's strategic ambition to align its financing activities with the objectives of the Paris Agreement and to contribute actively to the transition towards a low-carbon economy.

As part of its commitments included in the 2022–2025 Business Plan, in 2022 Intesa Sanpaolo published 2030 emissions reduction targets in four priority sectors: Oil & Gas, Power Generation, Automotive and Coal Mining[29].

Building on this foundation, in 2023, the Group expanded its target-setting efforts to include the Iron & Steel and Commercial Real Estate sectors. Further progress was achieved in November 2024, when the Group announced new decarbonisation targets for four additional high-emitting sectors: Agriculture – Primary Farming, Aluminium, Cement and Residential Real Estate. These sectors represent a significant share of financed emissions in the Group's portfolio and are critical for achieving broader decarbonisation goals. Additionally, the ambition for the Commercial Real Estate sector was increased[30] to a level consistent with the trajectory to keep the temperature increase well below 2 degrees. However, achieving the target for both Commercial and Residential Real Estate portfolios is significantly dependent on the successful implementation of government policies for decarbonising the energy grid.

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[31].

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.

Overall, the sectors covered by target setting account for ~73%[32] 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[33]. Results for 2025 show a decrease in absolute financed emissions by 12% compared to 2024 data for sectors covered by target setting.

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.
In 2025, the Group carried out specific activities aimed at financing selected technologies[34] in the Iron & Steel sector through dedicated financing transactions, with the objective of operationalising net zero ambitions by enabling client decarbonisation. The Group will evaluate to extend this approach to other emissions intensive sectors.

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 this Climate disclosure.

29 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.
30 The target for reducing operational emissions was raised to -49% from a 2022 baseline of 43.16 $kgCO_2e/m^2$.
31 Related to Power Generation, Automotive, Iron & Steel and Commercial Real Estate sectors and the following additional temperature rating targets:

	Metric	Baseline year (2022)	2028 Target (% vs baseline)	Value at 31.12.2025	% of portfolio value covered by public targets (% assessed using default scores)
Other Corporate Loans	°C (Scope 1 and 2)	2.95	2.47 (-16%)	2.60	32% (68%)
	°C (Scope 1, 2 and 3)	3.01	2.51 (-17%)	2.95	22% (78%)
Listed Equity & Bonds	°C (Scope 1 and 2)	2.23	1.99 (-11%)	1.93	61% (39%)
	°C (Scope 1, 2 and 3)	2.56	2.21 (-14%)	2.43	61% (39%)
Listed Equity & Bonds (Insurance)	°C (Scope 1 and 2)	2.28	2.02 (-11%)	1.98	73% (27%)
	°C (Scope 1, 2 and 3)	2.63	2.25 (-14%)	2.53	73% (27%)

32 Data breakdown as of 31 December 2025: Agriculture – Primary Farming (3.6%); Aluminium (0.5%); Automotive (4.4%); Cement (1.1%); Coal mining (0.2%); Commercial Real Estate (1.5%); Iron & Steel (4.0%); Oil & Gas (44.6%); Power generation (5.6%); Residential Real Estate (7.6%).
33 The percentages are calculated as the ratio between the sum of financed emissions/exposures in the portion of the value chain subject to target setting in each sector and the sum of financed emissions/exposures in the entire value chain of the highest-emitting sectors as indicated in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI.
34 The selection of technologies draws, where relevant, on EU Regulation 2024/1735.

The totals presented in this section may not correspond to the results obtained by performing calculations on the individual figures disclosed, due to rounding adjustments.

The table below shows, for each sector in scope of the target setting methodology, the metrics applied, the baseline, the target for 2030[35] and the benchmark scenario/tool considered for target setting

Sector	Scope	Value Chain	Metrics	Baseline (baseline date)	Target (2030)	Benchmark Scenario/Tool considered for target setting[36]
Agriculture – Primary Farming	Scope 1, 2	Focus on primary farming	tCO_2e/€mln revenue	721 (31.12.2022)	641	Europe Agriculture NGFS NZ 2050 (2023)
Aluminium	Scope 1, 2	Focus on aluminium producers (refining of alumina from bauxite and both primary and secondary smelting)	tCO_2e/t aluminium	4.79 (31.12.2022)	4.31	IAI NZ 1.5° (2021)
Automotive	Scope 3 WTW	Vehicle production	gCO_2e/vkm	192 (31.12.2022)	100[37]	IEA Net Zero Scenario Benchmark (2023) - TTW[38]
Cement	Scope 1, 2	Focus on cement producers, including production of clinker	tCO_2e/t cement	0.65 (31.12.2022)	0.50	IEA Net Zero Scenario Benchmark (2023)[39]
Coal Mining (exclusion policy)	Exclusion policy	Coal mining	€bn exposure	0.2 (30.06.2021)	Zero by 2025 Zero emissions	
Commercial Real Estate (CRE)[40]	Scope 1, 2, 3[41]	In-use operational emissions of buildings in Italy	$kgCO_2e/m^2$	43.16 (31.12.2022)	22.11	ISP specific WB2D pathway calculated through SBTi tool[42]
Iron & Steel	Scope 1, 2	Companies producing crude steel that use iron ore (or scrap) as an input	tCO_2/t steel[43]	1.05 (31.12.2022)	0.81	ISP specific 1.5°C - pathway calculated through SBTi tool
Oil & Gas	Scope 1, 2, 3	Upstream operators and integrated players	gCO_2e/MJ	64 (30.06.2021)	55[44] (52-58)	IEA Net Zero by 2050 Scenario (2021) + adjustments for methane and carbon capture
Power Generation	Scope 1, 2	Generation and integrated players	$kgCO_2e$/MWh	202 (31.12.2022)	110	IEA Net Zero Scenario Benchmark (2023)[39]
Residential Real Estate (RRE)[45]	Scope 1, 2, 3[46]	In-use operational emissions of buildings in Italy	$kgCO_2e/m^2$	30.13 (31.12.2022)	19.26	The target has been set by defining an ambitious pathway considering market trends, decarbonisation scenarios and systemic constraints specific to the portfolio

For details see sections: ANALYSIS BY SECTOR and METHODOLOGY: TARGET SETTING ON LENDING ACTIVITIES.

35 Targets may be adjusted in relation to the shift in reference scenarios.
36 Benchmarks and tools shown in this column are those considered in the process of target setting. The latest available benchmark for each sector is instead shown in the tables and figures included in the 'Analysis by sector' section below.
37 The target of 100 gCO_2e/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).
38 IEA Dataset (2023 release) – A conversion factor from pkm to vkm is applied.
39 IEA Dataset (2023 release).
40 Includes SME corporates but not SME retail. 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.
41 Scope 3 emissions for CRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
42 Implied by the IEA ETP B2DS Scenario. The pathway is calculated taking into account exposures related to commercial real estate and residential real estate for commercial purposes.
43 Iron & Steel considers only CO_2 GHG emissions.
44 Central value of the target range identified.
45 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.
46 Scope 3 emissions for RRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.

The table below shows **physical intensity** for each sector in scope of the target setting methodology, for exposures as of 31.12.2023, 31.12.2024 and 31.12.2025, as applicable.

Sector	Scope	Metrics	Baseline (baseline date)	31.12.2023	31.12.2024	31.12.2025
Agriculture – Primary Farming[47]	Scope 1, 2	tCO_2e/€mln revenue	721 (31.12.2022)	662	675	671
Aluminium	Scope 1, 2	tCO_2e/t aluminium	4.79 (31.12.2022)	4.33	4.38	3.03
Automotive	Scope 3 WTW	gCO_2e/vkm	192 (31.12.2022)	185	192	175
Cement	Scope 1, 2	tCO_2e/t cement	0.65 (31.12.2022)	0.65	0.64	0.63
Coal Mining (exclusion policy)	Exclusion policy	€bn exposure	0.2 (30.06.2021)	0.03	0.01	0.01[48]
Commercial Real Estate (CRE)[49]	Scope 1, 2, 3[50]	$kgCO_2e/m^2$	43.16 (31.12.2022)	44.25	38.94	36.14
Iron & Steel	Scope 1, 2	tCO_2/t steel[51]	1.05 (31.12.2022)	1.00	0.82	0.90
Oil & Gas	Scope 1, 2, 3	gCO_2e/MJ	64 (30.06.2021)	64	64	63
Power generation	Scope 1, 2	$kgCO_2e$/MWh	202 (31.12.2022)	180	123	108
Residential Real Estate (RRE)	Scope 1, 2, 3[52]	$kgCO_2e/m^2$	30.13 (31.12.2022)	29.67	28.77	26.88

For details see sections: ANALYSIS BY SECTOR and METHODOLOGY: TARGET SETTING ON LENDING ACTIVITIES.

The table below shows **absolute financed emissions** as of 31.12.2023, 31.12.2024 and 31.12.2025 for each sector in scope of the target setting methodology[53].

Sector	Scope	Absolute financed emissions Mt CO_2e		
		31.12.2023	31.12.2024	31.12.2025
Agriculture – Primary Farming	Scope 1, 2	0.8	0.7	0.9
Aluminium	Scope 1, 2	0.4	0.4	0.1
Automotive	Scope 3 WTW	1.0	1.0	1.1
Cement	Scope 1, 2	0.7	0.6	0.3
Coal Mining (exclusion policy)	Exclusion policy	0.1	0.1	0.0[48]
Commercial Real Estate (CRE)[49]	Scope 1, 2, 3[50]	0.8	0.5	0.4
Iron & Steel[51]	Scope 1, 2	1.2	1.0	1.0
Oil & Gas	Scope 1, 2, 3	15.1	12.6	10.9
Power generation	Scope 1, 2	2.0	1.5	1.4
Residential Real Estate (RRE)	Scope 1, 2, 3[52]	2.1	2.0	1.8
Total[54]		24.2	20.4	17.9

For details see sections: ANALYSIS BY SECTOR and METHODOLOGY: TARGET SETTING ON LENDING ACTIVITIES.
The total absolute financed emissions represented in this table are used in the calculation of the percentage of sectors covered by target setting, accounting for ~73% of the 2025 financed emissions related to the highest-emitting sectors identified in the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI.

47 For Agriculture – Primary Farming the approach is based on revenue intensity. See 'Methodology: Target Setting on Lending Activities' section below for further details.
48 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.
49 Includes SME corporates but not SME retail. 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.
50 Scope 3 emissions for CRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
51 Iron & Steel considers only CO_2 GHG emissions.
52 Scope 3 emissions for RRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
53 The total average 2025 PCAF score is 3.3.
54 Data breakdown as of 31 December 2025. ASSET CLASS: Loan: 16.3 $MtCO_2e$; Project Finance: 0.3 $MtCO_2e$; HTC: 1.2 $MtCO_2e$. SCOPE: Scope 1: 3.7 $MtCO_2e$; Scope 2: 0.5 $MtCO_2e$; Scope 3: 11.2 $MtCO_2e$. For Aluminium, Coal mining, Commercial Real Estate and Residential Real Estate the breakdown by scope is not available. COUNTRY/REGION: Italy: 5.5 $MtCO_2e$; Europe (excluding Italy): 9.2 $MtCO_2e$; Rest of the World: 3.0 $MtCO_2e$. Attribution by country/region is based on counterpart's head office, except for CRE and RRE, for which attribution is based on the property's location.

Below, the **portfolio coverage** (as at 31.12.2025) for each sector in scope for target setting methodology, with respect to the total **drawn amount** of consolidated balance sheet of the Intesa Sanpaolo Group[55].

Sector	Portfolio Coverage (%)	Drawn Amount (€bn)
Agriculture – Primary Farming	0.2%	0.9
Aluminium	0.04%	0.2
Automotive	0.4%	1.8
Cement	0.04%	0.2
Coal Mining	0.002%	0.01[56]
Commercial Real Estate	1.5%	6.4
Iron & Steel	0.2%	0.9
Oil & Gas	0.7%	3.1
Power Generation	1.8%	7.6
Residential Real Estate	24.8%	106.9
Total[57]	29.7%	128.0

The tables below show the details of the **portfolio-wide emissions intensity** for exposures as of 31.12.2023, 31.12.2024 and 31.12.2025 for each sector in scope of the target setting methodology.

Portfolio-wide emissions intensity ($MtCO_2e$/€bn lent)

Sector	31.12.2023	31.12.2024	31.12.2025
Agriculture – Primary Farming (Scope 1, 2)	0.8	0.8	1.0
Aluminium (Scope 1, 2)	0.9	0.9	0.7
Automotive (Scope 3 WTW)	0.8	0.8	0.6
Cement (Scope 1, 2)	3.0	2.8	1.6
Coal Mining (exclusion policy) (Scope 1, 2)	3.8	5.3	5.7[56]
Commercial Real Estate (CRE)[58] (Scope 1, 2, 3)[59]	0.1	0.1	0.1
Iron & Steel (Scope 1, 2)[60]	1.2	1.0	1.1
Oil & Gas (Scope 1, 2, 3)	3.7	3.5	3.5
Power generation (Scope 1, 2)	0.3	0.2	0.2
Residential Real Estate (RRE) (Scope 1, 2, 3)[61]	0.02	0.02	0.02
Total Portfolio-wide emissions intensity[62]	0.2	0.2	0.1

Note: each value is calculated as the ratio between financed (lent) emissions in scope (numerator) and total of lent exposure (denominator) in scope (see METHODOLOGY: TARGET SETTING ON LENDING ACTIVITIES)[63].

55 As of 31 December 2025, drawn amount was €430.7bn.
56 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.
57 Data breakdown as of 31 December 2025. ASSET CLASS: Loans: €124.1bn; Project Finance: €3.5bn; HTC: €0.4bn.
58 Includes SME corporates but not SME retail. 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.
59 Scope 3 emissions for CRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
60 Iron & Steel considers only CO_2 GHG emissions.
61 Scope 3 emissions for RRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
62 Data breakdown as of 31 December 2025. ASSET CLASS: Loans: 0.1 $MtCO_2e$/€bn; Project Finance: 0.1 $MtCO_2e$/€bn; HTC: 2.8 $MtCO_2e$/€bn. COUNTRY/REGION: Italy 0.05 $MtCO_2e$/€bn; Europe (excluding Italy): 1.35 $MtCO_2e$/€bn; Rest of the World: 0.75 $MtCO_2e$/€bn. Attribution by country/region is based on the counterparty's head office, except for CRE and RRE, for which attribution is based on the property's location.
63 Invested amount not material.

ANALYSIS BY SECTOR

- AGRICULTURE – PRIMARY FARMING
- ALUMINIUM
- AUTOMOTIVE
- CEMENT
- COAL MINING
- COMMERCIAL REAL ESTATE (CRE)
- IRON & STEEL
- OIL & GAS
- POWER GENERATION
- RESIDENTIAL REAL ESTATE (RRE)

AGRICULTURE – PRIMARY FARMING

Key perimeter and baselining design choices and considerations

Value chain in scope	Focus on primary farming
Emissions coverage	Scope 1, 2
Asset classes	Medium and long-term loans (includes corporates and SME corporates with more than €10mln revenue)
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	tCO_2e/€mln revenue
Portfolio weighting	Revenue-adjusted exposure weighted approach
Approach	Target revenue intensity value below 1.5 benchmark curve

Target setting

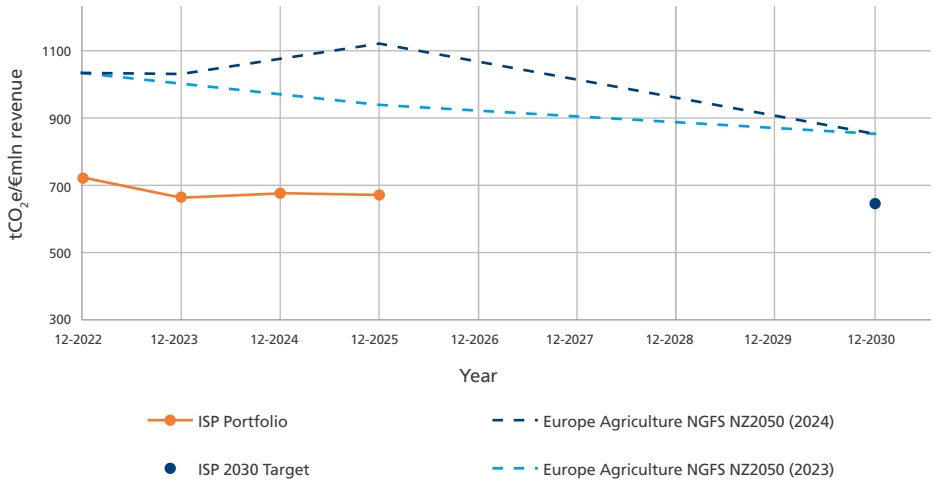
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€0.9bn
Estimated Physical intensity	721 tCO_2e/€mln revenue
Estimated absolute financed emissions	0.9 Mt CO_2e

Target and results

Target date	2030
Benchmark Scenario	Europe Agriculture NGFS NZ 2050 (2024)[64]
Estimated physical intensity	641 tCO_2e/€mln revenue
Target vs baseline (% decrease)	-11%
Target ambition	1.5°C aligned
2025 estimated physical intensity	671 tCO_2e/€mln revenue
2025 estimated absolute financed emissions	0.9 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€0.9bn
2025 PCAF Score[65]	4.3

Agriculture – Primary Farming (scope 1, 2) - Sector level physical intensity



64 Latest available benchmark scenario.
65 Reporting date of exposures.

Trends

In 2025, Intesa Sanpaolo further strengthened the decarbonisation pathway of its Agriculture – Primary Farming portfolio, continuing to pursue the target to reduce emissions intensity by 11% by 2030 compared with the 2022 baseline. The most recent monitoring data confirm a favourable positioning, significantly below the European sector average, thanks to the prevalence of lower-impact crop cultivation activities compared with intensive livestock farming.

The Bank has accelerated its support for the transition by specifically guiding agri-food value chains towards greater competitiveness and sustainability.

ALUMINIUM

Key perimeter and baselining design choices and considerations

Value chain in scope	**Focus on aluminium producers (refining of alumina from bauxite and both primary and secondary smelting)**
Emissions coverage	Scope 1, 2
Asset classes	Medium and long-term loans
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	tCO_2e/t aluminium
Portfolio weighting	Financed production weighted approach
Approach	Target physical intensity value below 1.5 benchmark curve

Target setting

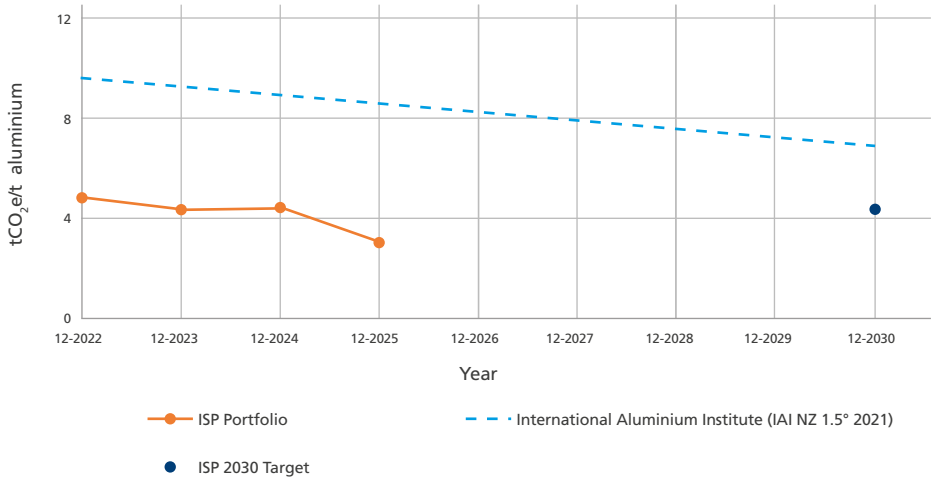
Baseline

Date	**31.12.2022**
In scope portfolio, on balance lending (drawn exposure)	€0.5bn
Estimated physical intensity	4.79 tCO_2e/t aluminium
Estimated absolute financed emissions	0.5 Mt CO_2e

Target and results

Target date	**2030**
Benchmark Scenario	IAI NZ 1.5° (2021)[66]
Estimated physical intensity	4.31 tCO_2e/t aluminium
Target vs baseline (% decrease)	-10%
Target ambition	1.5°C aligned
2025 estimated physical intensity	3.03 tCO_2e/t aluminium
2025 estimated absolute financed emissions	0.1 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€0.2bn
2025 PCAF Score[67]	2.0

Aluminium (scope 1, 2) - Sector level physical intensity



Trends

The Intesa Sanpaolo portfolio's physical intensity remains below the benchmark defined by the International Aluminium Institute and its projected pathway is consistent with the 2030 target, reflecting the Bank's continued support for clients' transition efforts. This alignment is driven by a combination of efficient operators, credible transitioning companies actively reducing emissions through technology and cleaner energy.

66 Latest available benchmark scenario.
67 Reporting date of exposures.

AUTOMOTIVE

Key perimeter and baselining design choices and considerations

Value chain in scope	Production of light duty vehicles (cars and light trucks)
Emissions coverage	Scope 3 Well To Wheel
Asset classes	Medium and long-term loans
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	gCO_2e/vkm
Portfolio weighting	Financed production weighted approach
Approach	Reduction

Target setting

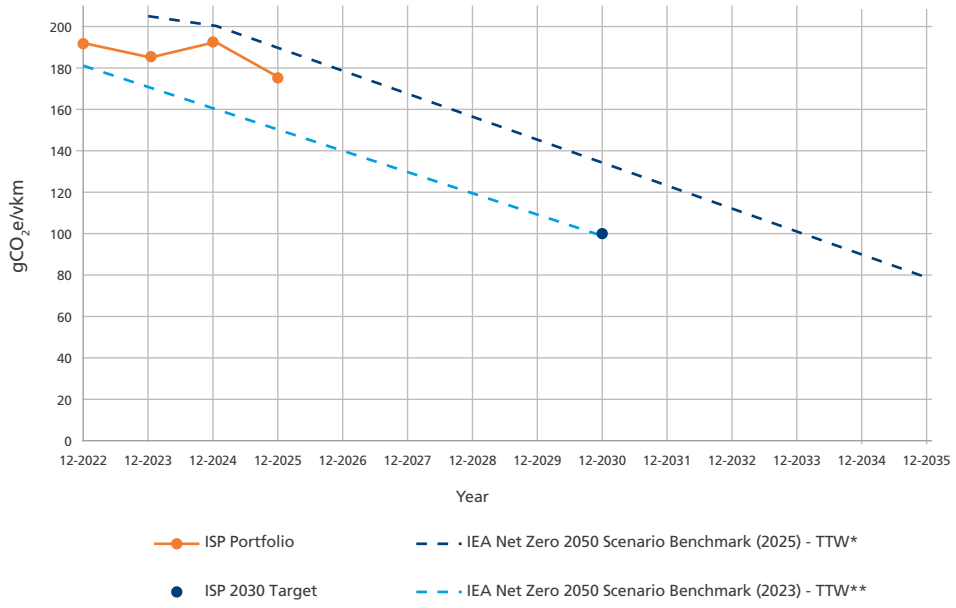
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€1.5bn
Estimated physical intensity	192 gCO_2e/vkm
Estimated absolute financed emissions	1.2 Mt CO_2e

Target and results

Target date	2030
Benchmark Scenario	IEA Net Zero Scenario Benchmark (2025) - TTW[68]
Estimated physical intensity	100 gCO_2e/vkm
Target vs baseline (% decrease)	-48%
Target ambition	1.5°C aligned
2025 estimated physical intensity	175 gCO_2e/vkm
2025 estimated absolute financed emissions	1.1 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€1.8bn
2025 PCAF Score[69]	3.0

Automotive (scope 3) - Sector level physical intensity



The IEA Scenario refers to the Tank-To-Wheel component and it is not comparable with the Automotive target which also includes the Well-To-Tank component.
* IEA Dataset (2025 release) - A conversion factor from pkm to vkm is applied.
** IEA Dataset (2023 release) - A conversion factor from pkm to vkm is applied.

Trends

In recent years, the Automotive sector has experienced uneven Battery Electric Vehicles (BEV) adoption, reflecting a combination of factors such as consumer preferences (high pricing, range anxiety, technological uncertainty, lack of public-charging infrastructure) and a still uncertain regulatory framework at the European level. Despite this uncertain scenario, the portfolio's physical intensity related to the automotive sector in 2025 shows a consistent decrease compared to 2024 results (WTW).

68 Latest available benchmark scenario. IEA Dataset (2025 release) – A conversion factor from pkm to vkm is applied.
69 Reporting date of exposures.

CEMENT

Key perimeter and baselining design choices and considerations

Value chain in scope	Focus on cement producers, including production of clinker
Emissions coverage	Scope 1, 2
Asset classes	Medium and long-term loans
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	tCO_2e/t cement
Portfolio weighting	Financed production weighted approach
Approach	Reduction

Target setting

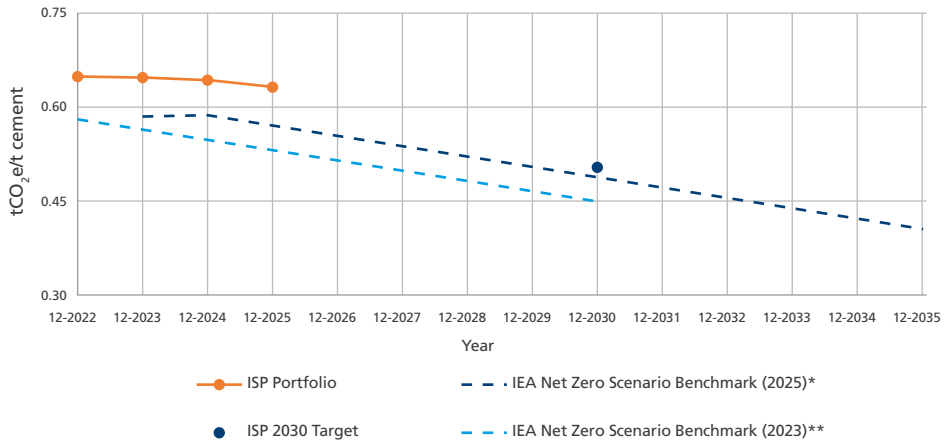
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€0.3bn
Estimated physical intensity	0.65 tCO_2e/t cement
Estimated absolute financed emissions	0.8 Mt CO_2e

Target and results

Target date	2030
Benchmark Scenario	IEA Net Zero Scenario Benchmark (2025)[70]
Estimated physical intensity	0.50 tCO_2e/t cement
Target vs baseline (% decrease)	-22%
Target ambition	1.5°C aligned
2025 estimated physical intensity	0.63 tCO_2e/t cement
2025 estimated absolute financed emissions	0.3 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€0.2bn
2025 PCAF Score[71]	1.6

Cement (scope 1, 2) - Sector level physical intensity



* IEA Dataset (2025 release).
** IEA Dataset (2023 release).

Trends

The physical intensity of the Intesa Sanpaolo's Cement portfolio - rather limited in terms of exposure - shows a slight decrease. IEA has recently reviewed the market scenario, reducing the ambition, which is reflective of the trend within the sector, defined as hard-to-abate, especially in the short term, due to the early stage of decarbonisation technological development.

70 Latest available benchmark scenario. IEA Dataset (2025 release).
71 Reporting date of exposures.

COAL MINING

Key perimeter and baselining design choices and considerations

Value chain in scope	Coal Mining
Emissions coverage	Scope 1, 2
Asset classes	Short-medium-long term loans
Target type	Exposure Phase-out - Exclusion policy
Metric	Euro
Perimeter	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 SME counterparties

Target setting

Baseline

Date	30.06.2021
In scope portfolio, on balance lending (drawn exposure)	€0.2bn
Estimated absolute financed emissions[72]	0.5 Mt CO_2e

Target and results

Target date	2025
Benchmark Scenario	Exclusion policy
Target ambition	1.5°C aligned
2025 estimated absolute financed emissions	0.0 Mt CO_2e*
2025 in scope portfolio on balance lending (drawn exposure)	€8mln*
2025 PCAF Score[73]	1.3

* 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.

72 Until 2022, for the financed emissions reported, a conversion factor (average of fossil fuel emissions in Europe) on the Coal Mining exposure has been applied. As from 2023 the methodology for the determination of financed emissions changed and is aligned to that applied to the other sectors, based on the definition of financed emissions at counterparty level, calculated as attribution factor per emissions for each counterparty.

73 Reporting date of exposures.

COMMERCIAL REAL ESTATE (CRE)[74]

Key perimeter and baselining design choices and considerations

Value chain in scope	In-use operational emissions of buildings in Italy
Emissions coverage	Scope 1, 2, 3[75]
Asset classes	Medium-long-term loans, including SMEs
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	$kgCO_2e/m^2$
Portfolio weighting	Financed floor area weighted approach
Approach	SBTi target setting tool

Target setting

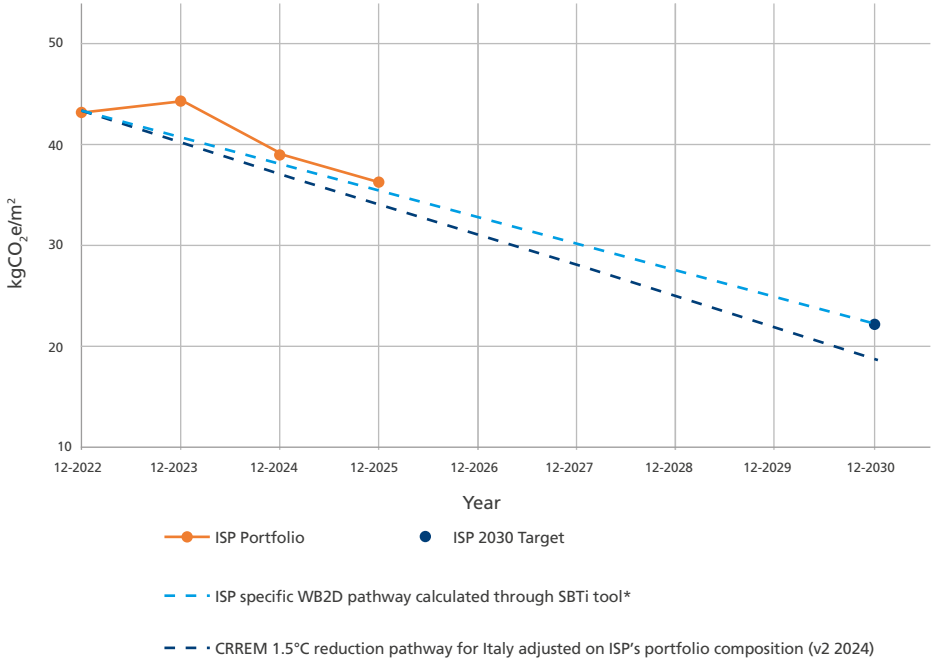
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€10.8bn
Estimated physical intensity	43.16 $kgCO_2e/m^2$
Estimated absolute financed emissions	1.0 $MtCO_2e$

Target and results

Target date	2030
Benchmark Scenario	CRREM 1.5°C reduction pathway for Italy adjusted on ISP's portfolio composition (v2 2024)[76]
Estimated physical intensity	22.11 $kgCO_2e/m^2$
Target vs baseline (% decrease)	-49%
Target ambition	WB2°aligned
2025 estimated physical intensity	36.14 $kgCO_2e/m^2$
2025 estimated absolute financed emissions	0.4 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€6.4bn
2025 PCAF Score[77]	3.9

Commercial Real Estate (scope 1, 2, 3) - Sector level physical intensity



* Implied by the IEA ETP B2DS Scenario.

Trends

The downward trend observed between 2023 and 2025 represents a convergence towards the decarbonisation trajectories of the benchmark curves and consolidates as a structural signal of the portfolio's progressive efficiency improvements, also supported by developments in the regulatory context, both at European level, with the energy efficiency targets set out in the EPBD, and at Italian level, considering the policy incentives supporting interventions on buildings.

Within this framework, the Bank's action supports the energy improvement of financed buildings, both for acquisition and new construction, as well as the EPC collection for the stock of mortgages[78].

74 Includes SME corporates but not SME retail. 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.
75 Scope 3 emissions for CRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
76 Latest available benchmark scenario. It is to be noted that the benchmark CRREM 1.5°C scenario for Italy is extremely challenging and highly reliant on factors that are dependent on government issued regulations and policies on buildings and electricity.
77 Reporting date of exposures.
78 For further details on data enrichment initiatives conducted by the Group to further improve transparency over the Real Estate perimeter and strengthen the quality of data related to energy performance classes, please refer to 'Climate and Environmental Risks: management and mitigation' section in the 'Risk Management' chapter.

A further driver of this trend, supporting expectations that it will continue, is the economic convenience associated with reducing energy consumption, even in a scenario of energy prices that—although partially normalised during 2025 compared with the peaks recorded in the 2022–2023 period—remain highly volatile and uncertain due to the current geopolitical context.

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.

IRON & STEEL

Key perimeter and baselining design choices and considerations

Value chain in scope	Companies producing crude steel that use iron ore (or scrap) as an input
Emissions coverage	Scope 1, 2[79]
Asset classes	Medium and long-term loans
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	tCO_2/t steel
Portfolio weighting	Financed production weighted approach
Approach	SBTi target setting tool (SDA)

Target setting

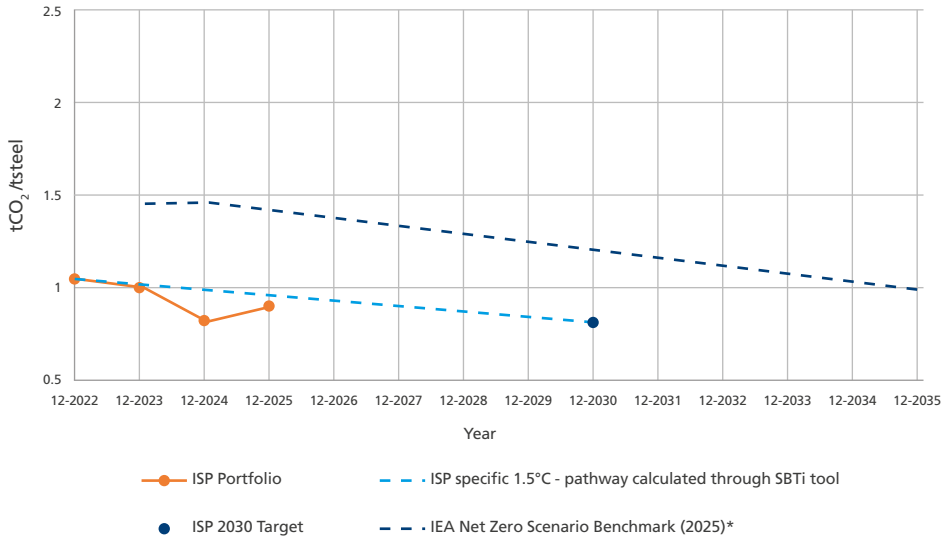
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€1.2bn
Estimated physical intensity	1.05 tCO_2/t steel
Estimated absolute financed emissions	2.0 Mt CO_2

Target and results

Target date	2030
Benchmark Scenario	IEA Net Zero Scenario Benchmark (2025)[80]
Estimated physical intensity	0.81 tCO_2/t steel
Target vs baseline (% decrease)	-23%
Target ambition	1.5°C aligned
2025 estimated physical intensity	0.90 tCO_2/t steel
2025 estimated absolute financed emissions	1.0 Mt CO_2
2025 in scope portfolio on balance lending (drawn exposure)	€0.9bn
2025 PCAF Score[81]	1.9

Iron & Steel (scope 1, 2) - Sector level physical intensity



* IEA Dataset (2025 release).

Trends

Despite a non-linear trajectory, the physical intensity of Intesa Sanpaolo's Iron & Steel portfolio remains below the IEA Net Zero Scenario benchmark (-14% vs baseline). In its latest 2025 update, the IEA revised the Net Zero Emissions (NZE) scenario for the Iron & Steel sector, shifting the trajectory to a less ambitious pathway, partly reflecting slower technology deployment and high investment requirements. Intesa Sanpaolo remains strongly committed to actively supporting the transition of Iron & Steel sector counterparties as they navigate the complex journey towards decarbonisation, aiming to achieve the declared 2030 physical intensity target. In addition, in 2025, the Group carried out specific activities to facilitate funding for selected technologies in the Iron & Steel sector[82] through dedicated financing transactions, with the objective of operationalising net-zero ambitions by enabling client decarbonisation.

79 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.
80 Latest available benchmark scenario. IEA Dataset (2025 release).
81 Reporting date of exposures.
82 The selection of technologies draws, where relevant, on EU Regulation 2024/1735.

OIL & GAS

Key perimeter and baselining design choices and considerations

Value chain in scope	Upstream operators and integrated players
Emissions coverage	Scope 1, 2, 3
Asset classes	Short, medium and long-term loans; bonds HTC
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	gCO_2e/MJ
Portfolio weighting	Financed production weighted approach
Approach	Convergence

Target setting

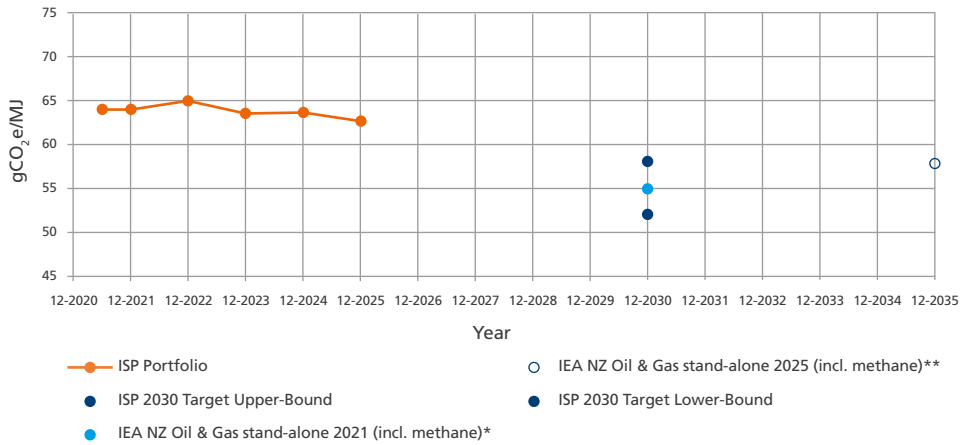
Baseline

Date	30.06.2021
In scope portfolio, on balance lending (drawn exposure)	€9.4bn
Estimated physical intensity	64 gCO_2e/MJ
Estimated absolute financed emissions	44.8 Mt CO_2e

Target and results

Target date	2030
Benchmark Scenario	IEA Net Zero Scenario Benchmark: IEA Dataset (2025 release) + adjustments for methane and carbon capture[83]
Estimated physical intensity	55[84] (52-58) gCO_2e/MJ
Target vs baseline (% decrease)	-14% (-18.7% / - 9.4%)
Target ambition	1.5°C aligned
2025 estimated physical intensity	63 gCO_2e/MJ
2025 estimated absolute financed emissions	10.9 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€3.1bn
2025 PCAF Score[85]	2.1

Oil & Gas (scope 1, 2, 3) - Sector level physical intensity



*The benchmark was built on top of the IEA Net Zero Oil & Gas stand-alone benchmark without renewables (50 gCO_2e/MJ in 2030) adding the contribution of methane emissions (2 gCO_2e/MJ) and adding back the carbon captured outside of the Oil & Gas (3 gCO_2e/MJ) as it is not under direct control/influence of the Oil & Gas players, driving the benchmark to 55 gCO_2e/MJ in 2030.
** The benchmark was built on top of the IEA Net Zero Oil & Gas stand-alone benchmark without renewables (49 gCO_2e/MJ in 2035) adding the contribution of methane emissions (2 gCO_2e/MJ) and adding back the carbon captured outside of the Oil & Gas (7 gCO_2e/MJ) as it is not under direct control/influence of the Oil & Gas players, driving the benchmark to 58 gCO_2e/MJ in 2035.

Trends

As of year-end 2025, the physical intensity of the Intesa Sanpaolo's Oil & Gas portfolio shows an improvement compared to year-end 2024. This reduction reflects a decrease in overall exposure, supported by effective portfolio management actions, as well as the broader trend in the Oil & Gas sector, with companies increasingly focused on reducing their GHG emissions.

83 Latest available benchmark scenario.
84 Central value of the target range identified.
85 Reporting date of exposures.

POWER GENERATION

Key perimeter and baselining design choices and considerations

Value chain in scope	Generation and integrated players[86]
Emissions coverage	Scope 1, 2
Asset classes	Medium and long-term loans
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	$KgCO_2e/MWh$
Portfolio weighting	Financed production weighted approach
Approach	Convergence

Target setting

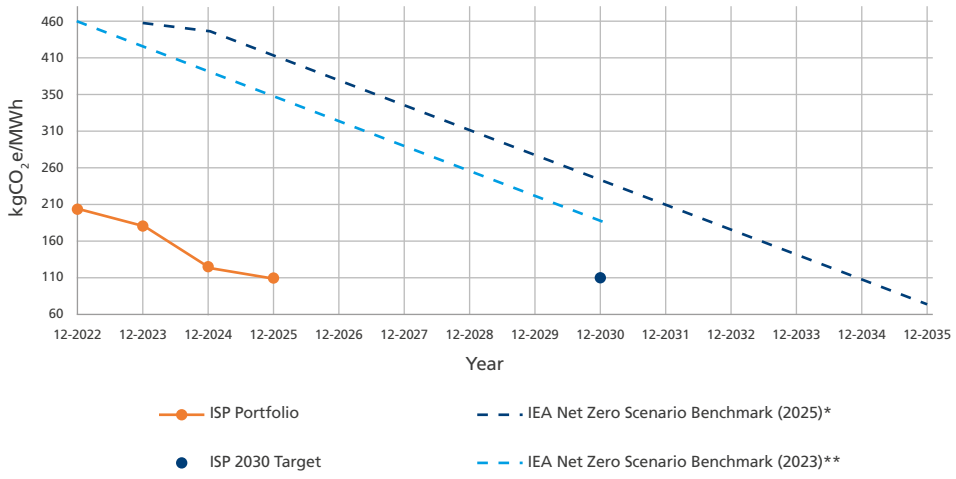
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€7.0bn
Estimated physical intensity	202 $KgCO_2e/MWh$
Estimated absolute financed emissions	2.7 Mt CO_2e

Target and results

Target date	2030
Benchmark Scenario	IEA Net Zero Scenario Benchmark (2025)[87]
Estimated physical intensity	110 $KgCO_2e/MWh$
Target vs baseline (% decrease)	-45.5%
Target ambition	1.5°C aligned
2025 estimated physical intensity	108 $kgCO_2e/MWh$
2025 estimated absolute financed emissions	1.4 Mt CO_2e
2025 in scope portfolio on balance lending (drawn exposure)	€7.6bn
2025 PCAF Score[88]	2.7

Power Generation (scope 1, 2) - Sector level physical intensity



* IEA Dataset (2025 release).
** IEA Dataset (2023 release).

Trends

In 2025, the Power Generation portfolio's physical intensity continued its downward trend, driven by ongoing investments in renewables, while the share of green exposures further increased in line with the Group's energy transition strategy.

86 Power generation from coal included.
87 Latest available benchmark scenario. IEA Dataset (2025 release).
88 Reporting date of exposures.

RESIDENTIAL REAL ESTATE (RRE)

Key perimeter and baselining design choices and considerations

Value chain in scope	In-use operational emissions of buildings in Italy
Emissions coverage	Scope 1, 2, 3[89]
Asset classes	Mortgages for retail clients
Target type	Intensity Sector Decarbonisation Approach (SDA)
Metric	$kgCO_2e/m^2$
Portfolio weighting	Financed floor area weighted approach
Approach	Reduction in line with Bank's feasibility assessment

Target setting

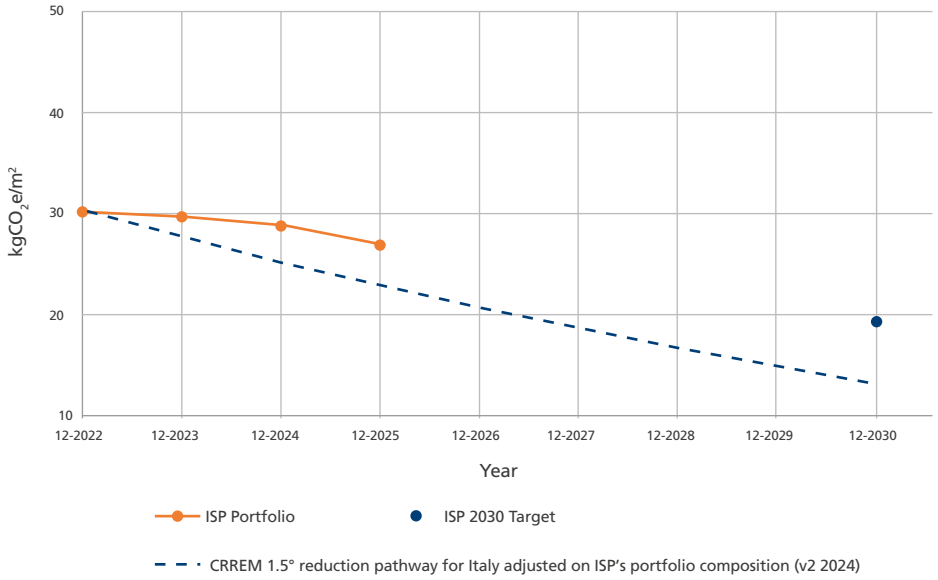
Baseline

Date	31.12.2022
In scope portfolio, on balance lending (drawn exposure)	€105.5bn
Estimated physical intensity	30.13 $kgCO_2e/m^2$
Estimated absolute financed emissions	2.1 $MtCO_2e$

Target and results

Target date	2030
Benchmark Scenario	CRREM 1.5°C reduction pathway for Italy adjusted on ISP's portfolio composition (v2 2024)[90]
Estimated physical intensity	19.26 $kgCO_2e/m^2$
Target vs baseline (% decrease)[91]	-36%
Target ambition	-
2025 estimated physical intensity	26.88 $kgCO_2e/m^2$
2025 estimated absolute financed emissions	1.8 $MtCO_2e$
2025 in scope portfolio on balance lending (drawn exposure)	€106.9bn
2025 PCAF Score[92]	3.4

Residential Real Estate (scope 1, 2, 3) - Sector level physical intensity



Trends

To support the decarbonisation of the Residential Real Estate portfolio, which confirms a downward trend for 2025, the contribution from the commercial offering side has been based on three main points. First, the redefinition of the green mortgage offering, revised in November 2024 in coherence with the Bank's objectives and the expectation to offer products that are progressively more in line with the criteria of the EU Taxonomy. The review considers not only the energy class of the property but also its energy consumption relative to the year of construction and the applicable climatic zone. Second, a structured external communication aimed at providing advisory services to customers, emphasising the importance of purchasing high-energy-efficiency properties and the benefits of energy retrofitting for existing buildings. Third, an internal communication focused on raising awareness among the Bank's network about key strategic priorities identified for national development. These initiatives have led to an increase in green mortgage disbursements in Italy over the past year, resulting in a

89 Scope 3 emissions for RRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
90 Latest available benchmark scenario. It is to be noted that the benchmark CRREM 1.5°C scenario for Italy is extremely challenging and highly reliant on factors that are dependent on government issued regulations and policies on buildings and electricity.
91 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.
92 Reporting date of exposures.

lower physical intensity of the portfolio. Finally, 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.

METHODOLOGY: TARGET SETTING ON LENDING ACTIVITIES

Interim targets are approved by the Board of Directors.

The methodology adopted by Intesa Sanpaolo, regarding baseline, metrics and target setting and progress against those targets, was prepared taking into account the 'Guidelines for Climate Target Setting for Banks' issued by UNEP FI in its April 2021 version and also the 'Financial Sector Science-Based Targets Guidance – version 1.2' issued by SBTi. Therefore, climate targets set by the Group aim to align with the temperature goals of the Paris Agreement and support the transition towards a net-zero economy by 2050.

The design choices regarding the value chain, the perimeter of the emissions considered and any proxies are in line with PCAF (Partnership for Carbon Accounting Financials) and, when applicable, with SBTi methodologies. The Bank applies the reference science-based scenarios, such as IEA Net-Zero 2050, whose curves are aligned with the temperature goals of the Paris Agreement.

In 2025, the Bank has introduced a new approach for dedicated financing, with a pilot in the Iron & Steel sector applied to a single initial transaction. In the case of lending to an in-scope Steel counterparty with known use of proceeds, financing receives a dedicated treatment to account for distinct nature of the transaction compared to general corporate lending.

1. SELECTION OF THE PERIMETER IN SCOPE

The 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. This assessment led to the identification, in the first round of target setting, of four sectors: Oil & Gas, Power Generation, Automotive, and Coal mining. In 2023 Intesa Sanpaolo worked on the setting of a new 2030 interim net-zero aligned target for the Iron & Steel sector and a decarbonisation target for 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, and fine-tuned perimeter and targets. In 2024 the Bank set new 2030 interim net-zero aligned targets for Agriculture – Primary Farming, Aluminium and Cement and a decarbonisation target for Residential Real Estate, to complete the highest-emitting and most relevant sectors for the Group.

1.1 Exposure in scope

Exposure in scope for the target setting exercise includes the Bank's lending and investment activities (related to Scope 3 Financed Emission – Category 15 emissions[93]) and in detail the following asset classes:

- drawn amount[94] on medium/long-term loans, except for the Oil & Gas target-setting perimeter which includes drawn amount on short, medium, long-term loans and Hold-to-collect (HTC) bonds, and for the Coal Mining target-setting perimeter which includes drawn amount on short, medium, long-term loans;
- Equity banking book[95].

1.2 Exclusion of SMEs

For the scope of the exercise, Small or Medium-sized Enterprises (SMEs), defined as specified by Article 501 (2) (b) CRR which refers to Commission Recommendation 2003/361/EC and identified through the 'Regulatory segment' (flag in Bank's IT systems), are excluded only if they are a non-subsidiary, individual company. The rationale for the exclusion of SMEs depends on the limited data availability on smaller, non-listed counterparties, which implies extensive leverage on sectoral proxies to estimate their emissions and production data and might lead to a strong convergence of the portfolio average target to the sectoral average.

The only exceptions are:

- Agriculture – Primary Farming target setting perimeter which includes SME Corporates with turnover over €10mln, as this allows the Bank to define a perimeter that is more representative of the typical size of the counterparties financed in this sector. The threshold has been set to allow for a material perimeter in terms of exposure while filtering out the set of smaller counterparties with less data availability and less steerability.
- Coal Mining target setting perimeter which is selected at counterparty level based on the 'Coal Mining' sector available in the Bank's IT systems and without any exclusion of SME counterparties.
- Commercial Real Estate target setting perimeter which includes SME corporates in line with the SBTi guidelines (SME retail clients are excluded).

93 As defined in 'The Global GHG Accounting and Reporting Standard Part A: Financed Emissions', Second Edition, Chapter 4.
94 Financial and commercial guarantees excluded.
95 In scope if material.

1.3 Value chain coverage

In line with industry standards, to avoid double counting only selected segments of the value chain of each sector are considered for the scope of the target setting exercise. Sectors and related segments considered are defined according to internal classification based on NACE codes (following the Italian classification ATECO – ATtività ECOnomiche) at the counterparty's group-level. For each sector, a definition of the value chain is performed in accordance with the main portfolio alignment methodologies and with the following principles: 1) incentivise positive climate impact, 2) be pragmatic and actionable, 3) ensure transparency, 4) maintain simplicity of implementation, 5) facilitate clear communication, 6) minimise double counting.

The subset of activities covered and the rationales for each sector are set out in the following bullets:

- **Agriculture – Primary Farming:** 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;
- **Aluminium:** 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;
- **Automotive:** focus on the production of light-duty vehicles (passenger cars and light trucks) to encourage the manufacturing of vehicles with low-emission technologies. Exclusion of manufacturing components (e.g., tyres, brakes) because these products are independent of final vehicle's emissions;
- **Cement**: focus on production of clinker and cement. Exclusion of mining of raw materials, production of concrete and downstream uses of cement/concrete;
- **Commercial Real Estate:** focus on the in-use operational emissions of buildings in Italy. The perimeter considers exposures related to commercial real estate and residential real estate for commercial purposes;
- **Iron & Steel:** focus on companies producing crude steel that use iron ore (or scrap) as an input. Mining of raw materials, steel finishing and downstream use are excluded given reduced emission materiality and low data availability;
- **Oil & Gas:** focus on upstream operators and integrated players to encourage operational efficiency in extraction and to foster companies' transition from high-emitting fossil fuels to lower-emitting fuels and renewables. Exclusion of refineries, pipelines and downstream to avoid double counting;
- **Power Generation:** focus on generation and integrated players to encourage the generation of electricity from low-emission energy sources. Exclusion of transportation and distribution to avoid double counting;
- **Residential Real Estate:** focus on the in-use operational emissions of buildings in Italy. The perimeter includes private retail clients which finance properties for residential purposes only.

Counterparties are assigned to the specific value chain segments based on Intesa Sanpaolo's sectoral and sub-sectoral classifications (available on the Bank's IT systems) at the parent company level. This assignment is further refined using counterparty-specific data reported by Divisions and can be overridden if necessary for the correct inclusion or exclusion of specific counterparties.

Sector	Scope of emissions	Value chain in scope	Coverage of greenhouse gases
Agriculture – Primary farming	1 and 2	Agricultural inputs **Primary farming** Food processing Retail & consumers	All GHGs
Aluminium	1 and 2	Mining of raw materials **Aluminium production** Users of aluminium	All GHGs
Automotive	3 WTW	Component manufacturing **Vehicle production*** Automotive distribution	All GHGs
Cement	1 and 2	Mining of raw materials **Clinker and cement production** Concrete production Users of cement	All GHGs
Coal mining	1 and 2	**Upstream** (e.g., extraction) Midstream (e.g., processing) Downstream (e.g., coal burning)	All GHGs

Sector	Scope of emissions	Value chain in scope	Coverage of greenhouse gases
Commercial Real Estate	1, 2 and 3	Upstream (e.g., raw materials extraction) **Building in-use** (e.g., combustion of fossil fuels) Downstream (e.g., dismantling)	All GHGs
Iron & Steel	1 and 2	Mining of raw materials **Production of iron and crude steel** Steel finishing and downstream use	CO_2 only
Oil and Gas	1, 2 and 3	**Upstream** (e.g., extraction) Midstream (e.g., transport) Refining (e.g., gasoline) Downstream (e.g., distribution)	All GHGs
Power generation	1 and 2	**Generation** Transmission Distribution (incl. trade)	All GHGs
Residential Real Estate	1, 2 and 3	Upstream (e.g., raw materials extraction) **Building in-use** (e.g., combustion of fossil fuels) Downstream (e.g., dismantling)	All GHGs

Legend: **Included in analysis**

* Well To Wheel

2. DEFINITION OF THE METHODS AND METRICS

2.1 Scope of emissions covered

For each sector, the scope of emissions was selected to maximise the share of emissions captured.

- Agriculture – Primary Farming: Scope 1 and 2
- Aluminium: Scope 1 and 2
- Automotive: Scope 3 - WTW emissions
- Cement: Scope 1 and 2
- Commercial Real Estate: Scope 1, 2 and 3[96]
- Iron & Steel: Scope 1 and 2[97]
- Oil & Gas: Scope 1, 2 and 3
- Power Generation: Scope 1 and 2
- Residential Real Estate: Scope 1, 2 and 3[98]

Scope selections are aligned with market practices, cover the bulk of the industry's emissions and are the data typically disclosed by industry players.

2.2 Target metric

Intesa Sanpaolo has decided to use a Sectoral Decarbonisation Approach (SDA). For all sectors, except for Agriculture – Primary Farming, the Bank adopts a physical intensity emission metric defined as the ratio between financed emissions and financed production for each sector. For Agriculture – Primary Farming, the Bank adopts a revenue intensity emission metric that measures emissions in relation to the total revenue of the counterparty.

Specifically, the units of measure used for the metric of each sector are the following (sector-specific emissions intensity metrics):

- Agriculture – Primary Farming: tCO_2e/€mln revenues
- Aluminium: tCO_2e/t aluminium
- Automotive: gCO_2e/vkm
- Cement: tCO_2e/t cement
- Commercial Real Estate: $kgCO_2e/m^2$
- Iron & Steel: tCO_2/t steel
- Oil & Gas: gCO_2e/MJ
- Power Generation: $kgCO_2e$/MWh
- Residential Real Estate: $kgCO_2e/m^2$

Note that for Coal Mining Intesa Sanpaolo did not define a target based on emission intensity but adopted a policy to completely phase-out within 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.

Counterparties' emissions data are collected in accordance with PCAF[99] guidelines (PCAF scores are reported above in 'Analysis by sector'):

- reported emissions, verified or unverified emissions collected directly from the borrower or investee company (e.g., company sustainability report) or indirectly via verified third-party data providers;
- physical activity-based emissions, for the 'core' scope (Scope 3 for Oil & Gas, Scope 1 for Power Generation, Scope 3 - WTW for Automotive, Scope 1 and 2 for Iron & Steel, Aluminium, Cement, Scope 1, 2 and 3 for Commercial and Residential Real Estate), estimated based on production data collected from the data provider (e.g., bottom-up approach);
- economic activity-based emissions, for Scope 1 and 2 for Agriculture – Primary Farming and for the 'other-no core' scope, estimated based on region and sector-specific average emission factors computed by the specific climate analytics platform and expressed per revenue (peers' group).

Intesa Sanpaolo's approach to estimating future portfolio emissions considers companies' commitments first. If not available, a reference scenario reduction rate is applied.

96 Scope 3 emissions for CRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
97 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.
98 Scope 3 emissions for RRE include emissions arising from the tenant's energy use in the building owner's emissions reporting.
99 Partnership for Carbon Accounting Financials.

Aggregation at portfolio level

For all sectors, except for Agriculture – Primary Farming, to aggregate the emission intensity of each counterparty at portfolio level, a financed production-weighted approach is applied. This means that the relative weight of each counterparty in the portfolio emission intensity is directly proportional to Intesa Sanpaolo's financed production (financed floor area for Commercial Real Estate and Residential Real Estate). Financed production calculation is based on an attribution factor computed as: Exposure/(Total equity + debt)[100].

For Agriculture – Primary Farming, to aggregate the emission intensity of each counterparty at portfolio level, a revenue-adjusted exposure - weighted approach is applied. This means that the relative weight of each counterparty in the portfolio emission intensity is directly proportional to the revenue attributable to Intesa Sanpaolo. Revenue-adjusted exposure is calculated as an attribution factor multiplied by revenue.

This approach is aligned with PCAF recommendations. Counterparties fully dedicated to renewable activities and project finance dedicated to 'green' activities receive an emission intensity equal to zero in the computation of the overall portfolio emission curves.

Data lag

Regarding the reference period of data used for December 2025, exposures as of December 2025 and 2024 emissions are considered, with a lag of 1 year. For Commercial and Residential Real Estate, the physical intensity as of December 2025 is calculated using a 2023 carbon factor for emissions intensity of final energy consumption, 2020 conversion factors to convert from primary to final energy intensity and December 2025 exposures.

Regarding the baseline:

- for Oil & Gas, the baseline exposure as of June 2021 considers 2019 emissions;
- for Iron & Steel, the baseline exposure as of December 2022 considers 2021 emissions;
- for Automotive, the baseline exposure as of December 2022 considers 2022 emissions;
- for Power Generation, the baseline exposure as of December 2022 considers 2020 emissions;
- for Agriculture – Primary Farming, Aluminium and Cement the baseline exposure as of December 2022 considers 2022 emissions;
- for Commercial and Residential Real Estate, the baseline physical intensity as of December 2022 is 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.

Disclaimer: *Metrics and data may be updated over time following the evolution of the emission calculation methodology, the updates to the UNEP FI and SBTi Guidelines, updated data sources and accepted market practices. Metrics and data are based on projections and estimates that rely on underlying sectoral assumptions and strategic plans of underlying entities. Such assumptions may be largely dependent on external factors that are not under Intesa Sanpaolo's control, such as, but not only, technological improvements and/or government-led policies. In addition, metrics calculation relies on data inputs, with quality and availability subject to change and may be enhanced over time. Please note that progress towards targets may be non-linear in the short term in view of the fact that financing of the transition to a low-carbon economy is required or in view of external factors.*

100 Please note that exposure/property market value is the attribution factor formula for the case of Commercial and Residential Real Estate.

SECTORAL TRANSITION PLAN

In 2022, Intesa Sanpaolo introduced its first High-Level Transition Plan[101], 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, 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. In 2024, the Sectoral Transition Plan was further expanded to include the Agriculture – Primary Farming, Aluminium, Cement and Residential Real Estate sectors, based on the definition of the respective targets. The Bank's emissions reduction targets are monitored on a quarterly basis.

The Sectoral Transition Plan is organised into three sections for each sector. It begins by assessing each sector's readiness for transition, outlining key challenges, enablers, and technology trends that create opportunities for decarbonisation. It then reviews the Group's progress against climate targets, highlighting gaps and priorities for acceleration with supporting data. The third part sets 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. The Plan is included in the Climate Report, which is approved by the Board of Directors and provides full information on wider climate-related governance, strategy, risk management and metrics and targets representing the framework within which the Transition Plan is embedded and to which reference should be made.

Intesa Sanpaolo's ESG governance represents the foundation of the Group's approach to sustainability, with strategic decisions and policies defined and approved by the Board of Directors, supported by the Risks and Sustainability Committee, and operational implementation ensured across the entire Group through its company structures and a dedicated managerial body.

Among Intesa Sanpaolo's ESG strategies, the ESG/Climate Credit Framework includes ESG/Climate criteria to assist strategic lending portfolio steering and transaction pricing, and operates on three levels: sector, counterparty and transaction supported respectively by the ESG sectoral heatmap, the ESG score, and the sustainable products and transactions framework.

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.

In addition, Intesa Sanpaolo supports the transition of different sectors by offering a range of dedicated financing solutions, including green mortgages, S-Loans, as well as specific initiatives aimed at improving businesses' sustainability profile and market competitiveness, such as Orizzonte Impresa Transizione Energetica, a program which focuses on facilitating businesses' transition, and CO_2 Mitigation Solutions, a product designed to support companies to reduce their emissions.

Climate and Environmental risks are integrated into the Risk Appetite Framework providing for, among other elements, dedicated limits and monitoring thresholds for sensitive sectors.

The Group has also defined policies that established criteria for the limitation and the exclusion of operations in sensitive sectors. The Sectoral Transition Plan also draws on ESG performance dialogues with Divisions and active engagement with stakeholders, including engagement activities with different customer segments, industry peers, relevant associations, public sector and civil society to gather inputs within the broader ESG area and to better support customers in their transition.

As concerns further Transition Plan disclosures, these are also included in the in-depth analysis required by CDP's annual assessment, compiled since 2007 by the Group, which can be viewed on the Group's website.

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101 Please refer to the 'Transition Plan' in the 2022 TCFD Report.

1 AGRICULTURE – PRIMARY FARMING

1.1 SECTORAL CONTEXT[102]

The agriculture sector contributes positively to climate mitigation by acting as a carbon sink. Through photosynthesis, crops absorb carbon dioxide, and well-managed soils store carbon, reducing its release back into the atmosphere. These natural processes are essential for maintaining ecosystem balance and supporting global decarbonisation efforts.

However, the sector is also a significant source of emissions. In 2022, farm-gate activities represented roughly 14% of global emissions. These emissions are mainly linked to livestock digestion, manure management, and soil treatment, primarily releasing methane and nitrous oxide. These sources are biologically driven and are particularly challenging to decarbonise.

In Europe, agricultural emissions saw a steady decline in earlier decades, thanks to improved practices, technology, and policy support. Between 1990 and 2000, EU agriculture emissions fell by over 15%. However, progress has slowed in recent years, with only a 7% estimated reduction recorded from 2005 to 2023. In 2024, the sector accounted for over 10% of the EU's total net greenhouse gas emissions.

Within the EU, Italian agriculture is well positioned for the green transition. The agri-food sector plays a crucial role in the country's economy, accounting for 15% of GDP and contributing over 11% to national exports. This excellence is underpinned by product diversification, continuous innovation, and a strong focus on sustainability. Italy stands out for its significant forest cover and the fact that 20% of its agricultural land is certified organic, double the EU average, placing the country on track to meet the EU's 25% target by 2030. Furthermore, compared to key European peers, a large share of Italy's utilised agricultural area is dedicated to perennial crops such as vineyards and olive groves, which require less soil disturbance and fewer annual inputs than arable crops. This reduces greenhouse gas emissions from machinery and fertiliser use, while enhancing carbon sequestration.

In terms of financing needs, the World Bank estimates that the agrifood sector requires $260 billion in annual mitigation investments globally, with $45–55 billion needed specifically for farm-gate interventions like implementation of regenerative practices, composting, and anaerobic digestion.

Instruments like the EU's Common Agricultural Policy (CAP), the Effort Sharing Regulation (ESR), and the Fit for 55 package, a set of EU laws aiming to reduce European emissions by at least 55% by 2030 compared to 1990, are central to this effort. The Common Agricultural Policy (CAP) dedicates roughly €387 billion for 2023–2027, of which 40% with climate and environmental relevance. Italy's CAP Plan allocates over €10 billion toward climate and environmental actions, including support for organic farming, reduced fertiliser and pesticide use, and soil conservation. Under the ESR, Italy is committed to a 44% reduction in emissions by 2030, compared to 2005 levels, from sectors not covered by the EU Emissions Trading System (ETS), including agriculture.

As implementation progresses, it will be important to ensure that farmers are supported throughout the transition. A balanced approach that aligns climate ambition with economic viability will be key to long-term success.

1.1.1 Key challenges

Despite available solutions, further abatement remains demanding.

- **Unproven solutions and slow adoption.** Technologies such as feed additives show promise but have not yet been proven at scale. Moreover, there is still a limited uptake of advanced innovations, including geographic information systems, Internet of Things solutions, robotics, sensors, drones, biotechnology, and precision farming.
- **Fragmented, small-scale sector.** In Europe the sector is mainly consisting of small farms with limited capital and access to technical guidance.
- **High upfront investment barriers.** Thus, high upfront investment costs for infrastructure upgrades such as financing the shift to renewable energy, construction of manure storage facilities or biogas plants remain an obstacle.
- **Persistent data gaps and limited reporting.** In addition, data gaps persist, as most farms are SMEs, resulting in limited reporting and sparse country-specific data on the cost and impact of mitigation measures.

102 The sources of the data and information presented in this section include: ISPRA, 'Greenhouse gas emissions from agriculture', https://indicatoriambientali.isprambiente.it/en/agriculture/greenhouse-gas-emissions-agriculture; Eurostat, 'Agricultural production', https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agricultural_production_-_crops; World Bank, 'Recipe for a liveable planet: Achieving Net Zero Emissions in the Agrifood System', https://openknowledge.worldbank.org/entities/publication/406c71a3-c13f-49cd-8f3f-a071715858fb; EEA, 'Total GHG emissions and removals in the EU', https://www.eea.europa.eu/en/datahub/datahubitem-view/3b7fe76c-524a-439a-bfd2-a6e4046302a2?activeAccordion=1091606; EEA, 'Progress and prospects for decarbonisation in the agriculture sector and beyond', https://www.eea.europa.eu/en/analysis/publications/progress-and-prospects-for-decarbonisation-in-the-agriculture-sector-and-beyond; EEA, 'Area under organic farming', https://www.eea.europa.eu/en/europe-environment-2025/countries/italy/area-under-organic-farming?activeTab=658e2886-cfbf-4c2f-a603-061e1627a515; European Commission, 'The common agricultural policy at a glance', https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-glance_en; European Commission, 'An environmentally sustainable CAP', https://agriculture.ec.europa.eu/cap-my-country/sustainability/environmental-sustainability/cap-and-environment_en; European Commission, 'Italy's CAP strategic plan', https://agriculture.ec.europa.eu/document/download/34058aa4-eee5-4579-99af-0e7c100d40ba_en?filename=csp-at-a-glance-italy_en.pdf; European Commission, 'Study on options for mitigating climate change in agriculture by putting a price on emissions and rewarding carbon farming', https://climate.ec.europa.eu/news-your-voice/news/looking-how-mitigate-emissions-agriculture-2023-11-13_en; Joint Research Centre – European Commission, 'GHG emissions of all world countries', https://edgar.jrc.ec.europa.eu/report_2025#data_download.

1.1.2 Key enablers

In Italy, the sector is broadly following alignment scenario pathways so far, but emissions reductions are expected to remain modest in the near term. To stay aligned with long-term climate goals, mitigation efforts will need to accelerate significantly after 2025, as most scenarios anticipate steeper declines in the second half of this decade. Main emissions reduction enablers, also related to carbon farming, include:

- **No-till preserves soil carbon.** No-till farming, which involves planting crops without disturbing the soil through ploughing or tilling, can help retain soil carbon.
- **Cover crops enhance carbon storage.** Cover cropping, i.e., growing crops like legumes or grasses between main crop cycles to protect soil, enhancing carbon storage.
- **Precision inputs reduce emissions.** Precision farming, using data from sensors and technology to apply fertilisers and water more efficiently, reducing emissions from excess inputs.
- **Additives curb enteric methane.** Feed additives that improve digestion in ruminants, reducing methane emissions from enteric fermentation.
- **Diet shifts and waste reduction lower emissions.** Solutions for a sustainable food system include promoting plant-based or low-emission proteins to cut diet-related emissions, minimising food waste to reduce methane emissions and adopting responsible sourcing to limit supply-chain impacts.
- **Forest restoration boosts sequestration.** Restoring public and private forests is also key to boosting carbon sequestration, preserving healthy ecosystems. The by-products of forest maintenance serve as a basis for producing electricity and thermal energy from biomass, further integrating the broader theme of renewable energy sources.

These measures, combined with improved manure management and bio-based fertilisers, represent key drivers for decarbonising the sector.

1.2 TARGET AND PROGRESS UPDATE

The Intesa Sanpaolo's Agriculture – Primary Farming portfolio remains on track to achieve the 2030 carbon intensity target of 641 tCO_2e/€mln, with a physical intensity of 671 tCO_2e/€mln in 2025 that represents a reduction compared to 2024. The portfolio continues to perform well against the calculated Europe NGFS Agriculture benchmark, primarily due to its increasing concentration in emission-efficient agricultural activities, specifically perennial crops such as grape and olive cultivation in Italy.

1.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR AGRICULTURE – PRIMARY FARMING DECARBONISATION

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.

The financial products promoted by Intesa Sanpaolo for agri-food businesses include:

- **Crescita Agri:** a financing solution designed to support investment, development and rebalancing programs for agricultural enterprises. This product provides access to both agricultural and non-agricultural credit (industrial credit);
- **S-Loan Progetti Green:** 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.

Furthermore, Intesa Sanpaolo introduced a series of initiatives benefiting the agri-food sector and the environment, including:

- **allocation of new lending capacity** worth €10 billion for the agri-food supply chain, announced in June 2025 during the launch of the 'Agri-Talk' initiative in Florence, and available through 2026. One of the four strategic pillars of this initiative is investing in plants, equipment, and innovation to address emerging scenarios driven by climate change, shifting consumption habits, and digitalisation. This program is part of the Group's broader €410 billion commitment to support projects linked to Italy's National Recovery and Resilience Plan (NRRP). The initiative aims to accelerate investments in sustainability, innovation, and international competitiveness across the agri-food sector. Of this amount, €1.5 billion is dedicated exclusively to the wine industry, reinforcing its role as a strategic pillar of 'Made in Italy' excellence and supporting thousands of wineries in strengthening resilience, quality, and global positioning;

- ***Il tuo futuro è la nostra impresa***, a flagship strategic program launched in 2024 and available through 2026, allocating €15 billion in lending capacity to strengthen the Italian agri-food sector as part of a broader €120 billion national plan. The initiative aims to accelerate transformation through energy transition, digitalisation, and international growth, in line with the objectives of the National Recovery and Resilience Plan (NRRP);
- **support for agri-food supply chains** through the *Programma Sviluppo Filiere*, managing 170 supply chain agreements to strengthen exports and facilitate access to credit. This programme fosters collaboration networks between leading companies and their suppliers, enhancing economic integration and resilience while facilitating credit access. Its key objectives include financial support, innovation, sustainability, competitive growth and the protection of Made in Italy. The programme aims to support all Italian agri-food supply chains, from agriculture to distribution;
- **agreement with Italian MASAF (Ministry of Agriculture, Food Sovereignty and Forests) and Cassa Depositi e Prestiti**, to promote credit policies and joint initiatives for the development of the agricultural and agri-food sector, in line with measures under the National Recovery and Resilience Plan (NRRP). Under this partnership, Intesa Sanpaolo has made available a €20 billion credit ceiling to support projects aimed at enhancing production chains, fostering technological innovation, improving sustainability, and facilitating generational turnover and internationalisation within Italian agriculture;
- **national agreement between Intesa Sanpaolo and ACEA** for water conservation and sustainable water management in production processes. The Bank, as part of its €410 billion National Recovery and Resilience Plan NRRP-aligned credit ceiling, makes €20 billion in lending capacity available to support systemic initiatives and innovative solutions to improve water efficiency, including for agri-food businesses. The partnership offers dedicated financial products, such as S-Loan Progetti Green, and advisory services to help companies access funds and public incentives;
- **agreement with Coldiretti and CIB (Italian Biogas Consortium)** to support enterprises developing new agricultural biomethane plants or converting existing biogas facilities, through dedicated financing solutions.

In addition to direct support for the agri-food sector, the Bank actively promotes research and development to drive technological transformation in agriculture. Nova+ Agritech, part of the Nova+ financing suite by Intesa Sanpaolo, provides medium- to long-term credit lines for projects focused on innovation, sustainability, and resilience in farming. This solution can finance up to 100% of eligible project costs and supports initiatives such as the development of new agricultural technologies, precision farming systems, and advanced processes aimed at reducing environmental impact and improving resource efficiency.

CASE STUDY

Intesa Sanpaolo structures sustainability linked financing to accelerate Euro Company's investment plan

Intesa Sanpaolo, through its Agribusiness Department within the Banca dei Territori Division, is supporting Euro Company with a €10 million S-Loan Progetti Green. As part of Intesa Sanpaolo's commitment to support companies in the green transition, this medium to long-term financing solution offers rate benefits upon completion of the projects within the agreed timeframe.

Euro Company, a benefit corporation based in Ravenna and a leader in the production and marketing of nuts and dried fruit, is investing in projects to strengthen its sustainability profile.

The plan includes expanding renewable energy generation, implementing a water treatment plant, introducing new production lines, and improving logistics. These initiatives are expected to significantly reduce on-site emissions and improve resource efficiency, contributing to a more sustainable production model.

2 ALUMINIUM

2.1 SECTORAL CONTEXT[103]

In 2024, global aluminium production increased by approximately 2.5% compared to 2023, following a rise around 3% in 2023 compared to 2022, driven by growing demand and by aluminium's role in technologies essential to the transition, as well as in higher value-added segments such as vehicles and digital devices. At the same time, emissions associated with 2023 production remained broadly stable compared to the previous year, at approximately 1.12 billion tonnes of CO_2 equivalent. This outcome was supported by improvements in energy efficiency, greater use of recycled aluminium—accounting for more than one third of total production—and an increased contribution from renewable energy sources in smelting processes, with renewables' share rising from 29% in 2020 to 42% in 2024.

Within this global picture, Europe stands out as a low-carbon hub for aluminium: primary aluminium produced in Europe has a carbon footprint of just 6.3 tonnes of CO_2 emissions per tonne of aluminium, almost 60% lower than the global average, largely due to the near-complete reliance on low-carbon electricity, with renewables accounting for over 97% of smelting power by 2024. However, the energy crisis has led to a sharp reduction in European smelting capacity, forcing the region to rely on imported primary aluminium for more than half of its needs. These imports often come from regions with higher-carbon production, which increases the embedded emissions in Europe's aluminium supply chain and risks offsetting the climate benefits achieved domestically. Beyond Europe, India—the world's second-largest primary aluminium producer and a notable supplier to the EU market—is strengthening its Perform, Achieve and Trade (PAT) scheme to incentivise energy efficiency in aluminium production.

Aluminium remains a 'hard-to-abate' sector, and the aluminium industry continues to face significant challenges in reducing emissions, and current progress indicates that further efforts will be required to fully align with climate objectives. At the global level, emissions intensity must decline by nearly 30% by 2030 and ~95% by 2050 compared to today's average to align with the 1.5°C pathway.

2.1.1 Key challenges

Despite progress, aluminium decarbonisation faces multiple hurdles, from recycling chain constraints and high capital needs for clean technologies to weak coordination across the value chain and market dynamics.

- **Recycling chain issues.** In Europe, the aluminium recycling chain faces growing challenges despite strong capacity development. Demand for recycled aluminium is rising as companies seek to cut emissions and energy use, yet scrap availability is increasingly constrained. Significant volumes are being exported to non-EU markets, driven by higher prices offered by countries such as Turkey, China, and India.
- **High capital expenditure for energy transition.** Shifting to renewable energy demands major investments in new infrastructure, including storage systems and backup power sources. Continuous R&D investment is also critical to enhance plant and process energy efficiency, upgrade existing facilities through retrofitting, and deploy advanced technologies such as electrified furnaces, innovative smelting methods, and next-generation recycling systems.
- **Coordination requires strengthening.** Decarbonising the aluminium value chain needs strong collaboration between suppliers and end-users to ensure consistent emissions cuts. Global alignment is further hindered by divergent regional regulations, market dynamics, and government policies across major producing regions.
- **Strong market growth pressures sustainability.** Global aluminium demand is seen rising. This growth risks higher emissions unless green technologies advance quickly. Cost pressures may lead companies to favour capacity expansion and short-term gains over sustainability, particularly in regions with weak regulations.

103 The sources of the data and information presented in this section include: IEA, 'World Energy Outlook 2025', https://www.iea.org/reports/world-energy-outlook-2025; International Aluminium, 'Global Aluminium Industry Greenhouse Gas Emissions Intensity Reduction Continues, With Total Emissions Below 2020 Peak', https://international-aluminium.org/global-aluminium-industry-greenhouse-gas-emissions-intensity-reduction-continues-with-total-emissions-below-2020-peak/; European Aluminium, 'Environmental Profile Report for the European aluminium industry', https://european-aluminium.eu/wp-content/uploads/2024/11/2024-11-07-European-Aluminium-EPR-2024-Executive-Summary.pdf; Consorzio Nazionale Imballaggi Alluminio, 'L'Italia si conferma tra i Paesi più virtuosi d'Europa per il riciclo e il recupero degli imballaggi in alluminio. Presentati i risultati 2024', https://www.cial.it/risultati-cial-2024/; World Economic Forum, 'Aluminium industry net-zero tracker', https://reports.weforum.org/docs/WEF_Net_Zero_Industry_Tracker_2024_Aluminium.pdf; European Commission, 'A European Steel and Metals Action Plan', https://single-market-economy.ec.europa.eu/document/download/7807ca8b-10ce-4ee2-9c11-357afe163190_en?filename=Communication%20-%20Steel%20and%20Metals%20Action%20Plan.pdf; European Aluminium, 'Supporting all industrial processes: what europe's aluminium sector needs from the industrial decarbonisation accelerator act', https://european-aluminium.eu/wp-content/uploads/2025/07/2025-07-08-European-Aluminium_Industrial-Decarbonisation-Accelerator-Act.pdf; Bureau of Energy Efficiency, Government of India, Ministry of Power, 'Perform Achieve and Trade (PAT)', https://beeindia.gov.in/objective.php; IEA, 'Tracking aluminium', https://www.iea.org/energy-system/industry/aluminium; International Aluminium, 'Aluminium recycling saves 95% of the energy needed for primary aluminium production', https://international-aluminium.org/landing/aluminium-recycling-saves-95-of-the-energy-needed-for-primary-aluminium-production/; International Aluminium, 'Primary Aluminium Production', https://international-aluminium.org/statistics/primary-aluminium-production; CIAL, 'Precious aluminium and Italian leadership', https://www.cial.it/en/precious-aluminium-and-italian-leadership/; CIAL, 'Ultimi dati europei sul riciclo delle lattine per bevande: aumentano le tonnellate di alluminio riciclato', https://www.cial.it/riciclo-lattine-europa-2022/#:~:text=L'aumento%20del%20volume%20di,2030%20il%2090%25%20di%20raccolta:%20Euracti; European Aluminium, 'Aluminium industry launches Circular Aluminium Action Plan for full circularity by 2030', https://pr.euractiv.com/pr/aluminium-industry-launches-circular-aluminium-action-plan-full-circularity-2030-203039.

2.1.2. Key enablers

Cutting emissions from aluminium is challenging because the process is energy-intensive and traditionally relies on carbon-based materials, yet technological and regulatory routes are key to shaping the transition.

- **Power decarbonisation.** Switching smelters from fossil-based electricity to renewables and hydrogen is the most impactful route. This is already proven and widely deployable, and advanced technologies now allow smelters to adjust energy use dynamically, making it easier to integrate variable renewable sources.
- **Process innovation.** Traditional smelting uses carbon anodes, which release CO_2 emissions during electrolysis; replacing these with inert anodes eliminates this source of emissions by releasing oxygen instead. Recent commercial-scale trials have demonstrated operational stability, but widespread adoption will require significant investment and time. Carbon capture and storage (CCUS) is emerging as a complimentary solution to address residual emissions, aiming to trap CO_2 from electrolysis; it remains at pilot stage, with demonstration projects scheduled through 2026.
- **Resource efficiency.** Recycling uses around 95% less energy than primary production and delivers immediate emissions savings. In Europe, recycling is well established and scalable, with rates exceeding 75% for packaging and over 90% for automotive and building applications, and in Italy aluminium production is entirely based on recycled material, demonstrating the feasibility of a fully circular approach.
- **Policy and regulation.** To turn these solutions from pilots into industry norms, policy frameworks are now aligning costs and incentives, rewarding low-carbon output and pricing emissions. In the EU, the Carbon Border Adjustment Mechanism (CBAM)[104] will apply a carbon price to imported aluminium from 2026, aiming to prevent competitive distortions by aligning the cost of emissions from the production of imported goods with those borne by European producers. Moreover, the EU Emissions Trading System (ETS) already requires companies to buy allowances for their emissions, creating a financial incentive to decarbonise. The Industrial Decarbonisation Accelerator Act (IDAA) is a proposed, currently under negotiation, legislative initiative within the Clean Industrial Deal, aiming to help energy-intensive industries, including aluminium, achieve net-zero while maintaining competitiveness. The proposal addresses two key barriers—slow permitting for clean technologies and weak markets for low-carbon products—through three key actions:
  - accelerating permitting procedures for industrial decarbonisation projects, including modernisation and decarbonisation efforts;
  - promoting high-impact projects and industrial clusters to facilitate access to funding and foster collaboration among interconnected industries;
  - creating strong demand for low-carbon products via procurement incentives, labelling schemes, and criteria for clean, resilient, and circular production, ensuring clear market signals and enabling a green premium for innovative technologies.

These measures collectively aim to accelerate investment in cleaner technologies and level the playing field globally, yet the capital need remains substantial: over $500 billion globally by 2050, primarily renewable power and smelter upgrades with annual investments of around €1.3 billion in Europe alone. At the same time, companies are pursuing circular economy strategies, including acquisitions of recycling businesses, to secure scrap supply and reduce reliance on carbon-intensive primary aluminium.

2.2 TARGET AND PROGRESS UPDATE

Over 2025, the average portfolio intensity of Aluminium, based on quarterly monitoring, stood at approximately 4.3 tCO_2e/t; however, as of 31st December, the value is around 3.03, in line with reduced volumes of exposure.

Companies in this sector can have different emissions efficiencies and changes in portfolio composition can lead to fluctuations in overall portfolio intensity.

Considering the perspective evolution, the portfolio intensity remains aligned with the IEA Net Zero 1.5°C pathway, supported by the presence of efficient producers and transitioning producers with credible commitments, actively implementing initiatives to reduce emissions by adopting alternative energy sources and advanced technologies, and a strong concentration of EU producers that typically operate at lower emissions levels.

104 The Carbon Border Adjustment Mechanism (CBAM) is an EU regulation (Regulation (EU) 2023/956) adopted in May 2023 under the 'Fit for 55' package. It introduces a carbon pricing mechanism for imports of certain goods (including aluminium, cement, iron and steel, fertilisers, electricity, and hydrogen) to ensure equal climate costs for EU and non-EU producers and to prevent carbon leakage. Starting from 1 October 2023, importers have been subject only to reporting obligations, without any financial adjustment, enabling them to familiarise themselves with requirements and collect emissions data. From 1 January 2026, the carbon pricing will be applied.

2.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR ALUMINIUM DECARBONISATION

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.

Key actions and strategic initiatives include:

- **Prioritising decarbonisation commitments.** Prioritise companies committed to reducing carbon emissions across their operations and supply chains, including the adoption of renewable electricity, electrified heat systems, and verified low-carbon sourcing strategies. Emphasis is placed on companies integrating transparent carbon reporting and third-party certification of emission reductions.
- **Focus on low-carbon technology adoption.** Supporting clients investing in advanced and near-zero technologies including the electrification of smelting processes, efficiency-enhancing digitalisation, and emerging low-carbon alternatives in bauxite extraction and alumina refining. Promote financing for technologies that substantially reduce process emissions and enable the shift toward low-emission or zero-emission smelting.
- **Financing renewable energy integration.** Supporting companies transitioning from fossil-fuel-based energy sources to renewable sources (e.g., hydropower, solar and wind), while also enabling access to long-term renewable energy agreements. Promote financing solutions that help integrate renewable energy into aluminium production, including investments in on-site energy production facilities, grid connection-upgrades, hybrid renewable systems.
- **Green infrastructure development.** Actively financing projects that enable the aluminium sector's transition by developing green industrial infrastructure, including advanced energy-storage systems, electrified or hybrid production facilities, hydrogen-ready equipment, and pilot or commercial-scale hydrogen-based smelting technologies. Support infrastructure that enables integration of CCUS solutions and increases sectoral resilience. Supporting producers who provide verified carbon-footprint data, enabling downstream industries (e.g., automotive, construction, packaging) to source low-carbon aluminium and accelerate decarbonisation across the value chain.
- **Encouraging circular economy practices.** Supporting companies committed to boosting aluminium recycling rates, investing in advanced scrap collection, sorting and high-purity remelting technologies, and scaling circular business models. Prioritise financing for systems that maximise secondary aluminium production and reduce reliance on primary metal, contributing to substantial lifecycle emission reductions.

3 AUTOMOTIVE

3.1 SECTORAL CONTEXT[105]

The automotive sector is undergoing significant transformation, yet progress towards climate objectives remains limited. Globally, in 2024, CO_2 emissions from road transport accounted for 75% of the transport sector emissions, with passenger cars dominating the segment. More specifically, emissions from cars rose by 0.5% to circa 3.2 Gt CO_2, making up slightly more than half of road transport emissions in 2024. Road transport accounted for approximately 45% of global oil consumption over the year.

Electric cars are rapidly gaining ground worldwide: in 2024, EV made up for more than a fifth of all cars sold globally, while vehicles powered solely by internal combustion engines remained far below their 2017 peak. However, the widening use of heavier, less efficient models, offset some of this progress. Combined with increased car ownership in emerging markets, these trends pushed total emissions from cars back to pre-pandemic levels.

These headwinds have also been reflected in International Energy Agency (IEA)'s updated Net Zero Emissions (NZE) scenario that now projects a more moderate intensity reduction until 2035. More specifically, to align with the IEA's NZE scenario, TTW[106] emission intensity of passenger vehicles must decline, on average, by 6% annually through 2035.

In the EU, road transport accounts for 73% of overall transport emissions. The market is steadily shifting toward cleaner mobility, with battery and hybrid EVs accounting for 21% of new car registrations in 2024, compared to global average of around 20% and up from 3% in 2019. This contributed to reducing the average CO_2 emissions of new passenger cars to around 107 g CO_2/km, a 13% decrease compared with 2019. However, total emissions from passenger cars in the EU fell only 6% from 2019 levels and remained almost unchanged from 2022, jeopardising progress toward achieving climate neutrality targets.

In 2024, the EU adopted the Alternative Fuels Infrastructure Regulation (AFIR), setting binding targets for public EV charging infrastructure across member states. It mandates high-power charging stations every 60 km along major road networks by 2025 and introduces standards for interoperability, transparent pricing, and real-time data sharing to ensure that infrastructure keeps pace with EV adoption. In parallel, the EU tightened CO_2 emission standards under the Fit for 55 package in 2023, with a target of zero emissions for new cars by 2035. However, recent developments suggest this timeline may be revisited, reflecting industry concerns and the need to balance ambition with feasibility. Indeed, in December 2025, the European Commission presented the 'Automotive Package', proposing a revision of certain key elements of the Fit for 55 package for the automotive sector. The proposal includes, inter alia, the conversion of the 2035 ban on the registration of new internal combustion engine vehicles into a target requiring manufacturers to achieve a 90% reduction in tailpipe emissions, as well as an initiative aimed at supporting European battery cell manufacturers through the provision of concessional credit.

To further support the shift, the European Commission published the EU Automotive Action Plan in 2025. Serving as a strategic roadmap for the sector, the plan aims to stimulate demand through incentives, accelerate the roll-out of charging infrastructure, and support innovation in clean mobility.

3.1.1 Key challenges

The industry's transition to cleaner mobility is challenged by near-term obstacles that continue to impede the pace of decarbonisation.

- **Uneven EV adoption**. EV sales in the EU decelerated to 21% of new car registrations, from around 23% in 2023. In addition, diverging EU incentives and tariffs on Chinese imports may raise costs and unstable regulatory framework, the lack of a widespread charging network, and still limited electric vehicle driving range have created significant uncertainty in consumer purchasing decisions, slowing the replacement rate of an aging and inefficient vehicle fleet.
- **EV infrastructure gaps.** EV adoption depends on a reliable, widespread charging network, which remains underdeveloped. Challenges include inadequate coverage, poor accessibility, and lack of standardisation.
- **Battery material supply risks.** Transition to electric mobility hinges on battery technology, but securing sustainable supplies of critical materials (lithium, cobalt, nickel) remains difficult due to their concentration in a few regions, with geopolitical instability, limited mining capacity, and environmental concerns around extraction. Demand is rising faster than supply, creating price volatility and supply chain risks.

105 The sources of the data and information presented in this section include: IEA, 'Cars and Vans', https://www.iea.org/energy-system/transport/cars-and-vans; EEA, 'Greenhouse gas emissions from transport in Europe', https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emissions-from-transport; EEA, 'Total GHG emissions and removals in the EU', https://www.eea.europa.eu/en/datahub/datahubitem-view/3b7fe76c-524a-439a-bfd2-a6e4046302a2?activeAccordion=1091606; IEA, 'Energy Efficiency 2024', https://iea.blob.core.windows.net/assets/f304f2ba-e9a2-4e6d-b529-fb67cd13f646/EnergyEfficiency2024.pdf; IEA, 'World Energy Outlook 2025', https://www.iea.org/reports/world-energy-outlook-2025; EEA, 'New registrations of electric cars in Europe', https://www.eea.europa.eu/en/analysis/indicators/new-registrations-of-electric-vehicles; IEA, 'What Next for the Global Car Industry?', https://iea.blob.core.windows.net/assets/0b32e014-f1c6-43f6-9c9f-ee9bfc8c2e65/Whatnextfortheglobalcarindustry.pdf; EEA, 'Average CO_2 emissions from new cars and new vans slightly increased in 2024', https://www.eea.europa.eu/en/newsroom/news/average-co2-emissions-from-new-cars-and-new-vans; Council of the European Union, 'CO_2 emissions in cars: Council gives final approval to additional flexibility for carmakers', https://www.consilium.europa.eu/en/press/press-releases/2025/05/27/co2-emissions-in-cars-council-gives-final-approval-to-additional-flexibility-for-carmakers/; European Commission, 'Cars and vans', https://climate.ec.europa.eu/eu-action/transport/road-transport-reducing-co2-emissions-vehicles/co2-emission-performance-standards-cars-and-vans_en; European Parliament, 'The crisis facing the EU's automotive industry', https://www.europarl.europa.eu/RegData/etudes/ATAG/2024/762419/EPRS_ATA(2024)762419_EN.pdf; European Commission, 'CO_2 emissions from new cars and vans continued to decrease in 2023 as zero-emission vehicles registrations continued to grow', https://climate.ec.europa.eu/news-your-voice/news/co2-emissions-new-cars-and-vans-continued-decrease-2023-zero-emission-vehicles-registrations-2024-06-10_en; IEA, 'Outlook for electric mobility', https://www.iea.org/reports/global-ev-outlook-2024/outlook-for-electric-mobility; European Commission, 'Industrial Action Plan for the European automotive sector', https://transport.ec.europa.eu/document/download/89b3143e-09b6-4ae6-a826-932b90ed0816_en; McKinsey, 'Road mobility', https://www.mckinsey.com/capabilities/sustainability/our-insights/spotting-green-business-opportunities-in-a-surging-net-zero-world/transition-to-net-zero/road-mobility.

106 Tank-to-Wheel (TTW): Emissions and energy use during vehicle operation (from fuel tank or battery to wheels), excluding upstream fuel production.

- **Environmental impact of EV production.** EVs help reduce direct CO_2 emissions and support EU sustainability goals, but their production still involves environmental challenges: material extraction for batteries is highly energy-intensive, and battery manufacturing itself generates substantial CO_2 emissions. Additionally, end-of-life battery management poses serious sustainability concerns as improper disposal can contaminate soil and water with heavy metal, while recycling is energy-intensive and still inefficient.

3.1.2 Key enablers

Despite the above stated challenges, the following factors are considered as key drivers to accelerate the automotive sector's transition.

- **Advanced vehicle technologies.** Apart from battery electric vehicles, key emission reduction enablers include:
  - Hybrid systems (including plug-in hybrid EVs), which improve fuel use in conventional models. The technology is highly mature and widely adopted;
  - Fuel cell vehicle powered by hydrogen show strong potential for long-range use. Although there is evidence of some commercial applications, the technology remains in its early stages, particularly for passenger vehicles;
  - In addition, advances in vehicle design and lightweight materials also help in reducing emissions by increasing vehicle efficiency;
- **EV scale-up and infrastructure investments.** Achieving the transition to Net Zero will require a rapid scale-up in electric vehicle sales, which are expected to account for up to two thirds of total vehicle sales by 2030, alongside significant investments in supporting infrastructure. Approximately $3.5 trillion per year will need to be invested globally in low-emission vehicles and in charging and fuelling infrastructure through 2050 to remain aligned with decarbonisation targets. IEA also highlights that the pace of infrastructure development, especially public charging stations and grid integration, is crucial to keep up with demand and climate target.
- **Policy and regulatory framework.** Finally, clear policies and strong regulations are essential to guide the shift toward clean mobility and ensure the sector keeps pace with climate targets.

3.2 TARGET AND PROGRESS UPDATE

In 2025, the physical intensity of Intesa Sanpaolo's automotive portfolio decreased by almost 9% to 174,89 gCO_2e/vkm,despite the concentration of exposure to European manufacturers, where the transition to electric vehicles has slowed relative to prior expectations. Although global electric vehicle sales continue to expand according to the International Energy Agency, the pace of adoption in Europe has moderated following the interruption or reduction in scope of subsidy programs, as occurred in Germany and France. Furthermore, regulatory flexibility introduced for the 2025–2027 compliance period, permitting manufacturers to average fleet CO_2 emissions over three years rather than annually, has diminished short-term incentives to accelerate electrification. Approximately 90% of portfolio exposure is to manufacturers that have publicly committed to reducing CO_2 emissions and have established interim targets to support this transition.

3.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR AUTOMOTIVE DECARBONISATION

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. In line with this commitment, Intesa Sanpaolo focuses on several strategic areas, including:

- **Financing the establishment and integration of battery supply chains.** The Bank actively seeks opportunities to fund the establishment and integration of battery production capabilities, which are essential to accelerating the energy transition. Scalable and efficient battery manufacturing is critical for enabling automotive companies to meet the growing demand for electric vehicles and to ensure the resilience of supply chains in a rapidly evolving market.
- **Supporting innovation across the automotive ecosystem.** Intesa Sanpaolo provides financial resources and strategic guidance to companies investing in next-generation technologies, such as carbon-neutral production processes and sustainable materials. By acting as a catalyst for innovation, the Bank aims to foster the development of solutions that reduce emissions and enhance the sustainability of automotive manufacturing and mobility services.

- **Strengthening client engagement.** The Bank prioritises long-term relationships with Original Equipment Manufacturers (OEMs), suppliers, and innovators leading the transition to sustainable mobility. Through collaborative engagement, Intesa Sanpaolo offers tailored financial solutions to support decarbonisation strategies, research and development initiatives, and production objectives.
- **Participating in public sector initiatives.** Recognising the substantial financial requirements associated with the shift to electric and sustainable mobility, Intesa Sanpaolo collaborates with public sector programmes to amplify its impact. The Bank provides medium to long-term loans for projects that advance low-emission transport and sustainable mobility, leveraging instruments such as the SACE Growth Guarantee[107], which facilitated access to capital for companies also undertaking green investments.
- **Promoting research and development through Nova+ Mobility.** In addition to financing, Intesa Sanpaolo supports innovation by promoting projects focused on sustainability, digitalisation, and connectivity within the mobility sector through its Nova+ Mobility initiative. This programme is designed to accelerate research and development, enabling companies to integrate cutting-edge technologies and digital solutions that enhance efficiency, reduce environmental impact, and create new opportunities for sustainable growth.

4 CEMENT

4.1 SECTORAL CONTEXT[108]

Cement is one of the most carbon-intensive sectors, responsible for about 8% of global GHG emissions in 2024. Unlike other sectors where emissions mostly arise from energy use, cement production emissions come from the chemical process of clinker production, which releases CO_2 when limestone is converted to clinker, and from the combustion of fuels to heat kilns to very high temperatures. These process emissions are inherent to the current chemistry, making the sector one of the hardest to decarbonise. Globally, in 2024, emissions declined by 3.5% compared to 2023 and by about 5% with respect to 2019, mainly due to lower demand.

In Europe, cement emissions have decreased significantly since 1990, with most progress occurring before 2010, driven by efficiency improvements and alternative fuels. However, reductions have slowed in recent years, and globally, cement emissions intensity has remained broadly flat.

The IEA Net Zero scenario projects a yearly 3% reduction in CO_2 intensity throughout 2035 compared with 2024 levels with intensity reduction mainly occurring after 2030 through technologies like carbon capture and alternatives to clinker.

Global investment needs for cement decarbonisation are estimated at $1.42 trillion through 2050, with low-carbon cement carrying a higher cost of 50–70%.

Less than 1% of global cement is near-zero emissions today. IEA estimates that most mitigation after 2025 depends on rapid scale-up of CCUS and clinker reduction, while energy efficiency, electrification, and fuel switching continue. Achieving a just and investable transition for the cement sector will require a balanced approach that combines climate ambition with industrial competitiveness, supported by predictable policy, infrastructure development, and market incentives.

107 Available until 31.10.2025.

108 The sources of the data and information presented in this section include: World Economic Forum, 'Cement Industry net-zero tracker', https://www.weforum.org/publications/net-zero-industry-tracker-2024/cement-industry-net-zero-tracker-2024/; World Economic Forum, 'Concrete solutions: Decarbonizing cement and concrete across the value chain', https://www.weforum.org/stories/2025/09/a-value-chain-approach-to-decarbonizing-cement-and-concrete/; World Economic Forum, 'Scaling the Industrial Transition: Hard-to-Abate Sectors and Net-Zero Progress in 2025', https://reports.weforum.org/docs/WEF_Scaling_the_Industrial_Transition_2025.pdf; IEA, 'Tracking Clean Energy Progress 2023', https://www.iea.org/reports/tracking-clean-energy-progress-2023; IEA, 'World Energy Outlook 2024', https://www.iea.org/reports/world-energy-outlook-2024; IEA, 'Net Zero Roadmap: A Global Pathway to Keep the 1.5 °C Goal in Reach', https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-c-goal-in-reach; IEA, 'World Energy Outlook 2025', https://www.iea.org/reports/world-energy-outlook-2025; European Commission, 'EU Innovation Fund – Dashboard', https://dashboard.tech.ec.europa.eu/qs_digit_dashboard_mt/public/sense/app/6e4815c8-1f4c-4664-b9ca-8454f77d758d/sheet/bac47ac8-b5c7-4cd1-87ad-9f8d6d238eae/state/analysis; European Commission, 'Learning from publicly funded research on cement decarbonisation options', https://publications.jrc.ec.europa.eu/repository/handle/JRC137848.

4.1.1 Key challenges

Despite progress, the cement industry still encounters significant obstacles that could slow its environmental transition, ranging from material availability to technological and energy challenges:

- **Limited availability of alternative cementitious materials and rising competition.** Availability of alternative cementitious materials is often limited and unevenly distributed. Growing demand for these low-carbon solutions could drive competition and costs, further straining supply.
- **CCUS costs, infrastructure, and regulatory barriers.** Carbon Capture, Utilization, and Storage (CCUS) currently face cost and infrastructure challenges but could play a role in the long-term. The widespread adoption of CO_2 capture technologies will also largely hinge on regulation design and implementation. So far, only a few States have introduced rules governing compensation for operators implementing carbon capture plants.
- **Securing low carbon power grid constraints.** Securing adequate low-carbon power for electrification and low-carbon processes will be challenging in regions with limited renewable infrastructure, as added demand may strain grids, raise costs, and necessitate major investments in renewables and grid upgrades.

4.1.2 Key enablers

Key levers for reducing emissions of the sector include both technological solutions, such as process innovations and efficiency improvements, as well as policy frameworks:

- **Clinker substitution and low carbon materials.** Clinker substitution using supplementary cementitious materials (SCMs), which are other materials blended into cement to reduce the amount of clinker required. Emerging solutions include new materials such as alternative binders and CO_2-cured concrete, which hardens by absorbing CO_2 instead of water, offering potential for significant emissions reductions if scaled up.
- **Energy efficiency in kilns and production lines.** Energy efficiency improvements that make kilns and production lines use less energy overall.
- **Fossil fuel use reduction.** Through the electrification of certain processes and the use of alternative fuels, particularly biomass and non-recyclable waste.
- **CCUS in the long-term for residual emissions.** CCUS in the long-term could serve as a complementary solution, although currently facing challenges, to reduce residual emissions.
- **EU ETS and CBAM to reduce emissions.** The EU introduced two complementary instruments to reduce emissions in the sector. Firstly, the EU Emissions Trading System (ETS), requiring cement producers to buy allowances for their CO_2 emissions, creating a financial incentive to reduce emissions. In addition, non-EU producers are subject to the Carbon Border Adjustment Mechanism (CBAM), which began its transitional phase in October 2023, with full implementation in 2026, aiming to align carbon costs for imports with those borne by EU producers.
- **EU funding: Innovation Fund and Horizon.** Finally, the EU Innovation Fund, financed by revenues from the ETS, is one of the world's largest programs for low-carbon technologies. As of 2024, the Fund awarded grants of circa €152 million to 16 cement projects across nine countries, expected to avoid 138 million tonnes of CO_2. In addition, under EU's Horizon programme, 71 projects related to cement decarbonisation received €416 million, with a strong focus on CCUS technologies.

4.2 TARGET AND PROGRESS UPDATE

The cement portfolio recorded a marginal 1% decrease in physical intensity in 2025, reaching 0.63 tCO_2e/t, remaining broadly unchanged from the 2022 baseline (-2.5%). This minor variation is primarily due to fluctuations in drawn exposure across counterparties. The portfolio reflects the broader trend within a sector widely regarded as one of the hardest to decarbonise, particularly in the short term. The transition requires large-scale deployment of innovative technologies whose viability is yet to be proven at scale.

Although immediate reductions in portfolio intensity are limited, the fact that a relevant share of exposure is concentrated in producers with credible transition plans and interim targets provides a basis for future decarbonisation as these plans begin to deliver measurable results. Notably, a majority of these producers by exposure have emissions reduction targets validated by the Science Based Targets initiative (SBTi).

4.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR CEMENT DECARBONISATION

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:

1. **Financing transition-aligned clients.** The Bank will continue supporting companies that demonstrate clear Net Zero pathways, prioritising those with ambitious targets that are aligned with internationally recognised frameworks.
2. **Supporting the development of sector-wide transition solutions and low-carbon innovation.** Intesa Sanpaolo supports clients who are pioneering green solutions and fostering collaboration between stakeholders to catalyse the sector's shift toward decarbonisation. In particular, the Bank will:
   a. **Finance Green Cement Technologies.** Intesa Sanpaolo supports companies transitioning to low-carbon alternative fuels, such as biomass and waste-derived fuels, and promotes innovative solutions that reduce cement production process emissions, including the adoption of alternative raw materials and clinker substitution;
   b. **Promote Energy Efficiency and Renewable Energy Integration.** Beyond fuel switching, significant emissions reductions require improving the overall energy performance of cement plants and decarbonising electricity use. The Bank will prioritise financing for cement producers replacing fossil-based energy with renewable solutions, such as electrification or green hydrogen;
   c. **Monitor and support Carbon Capture, Utilisation and Storage (CCUS) solutions.** Since cement emissions are intrinsic to its production process, CCUS is a promising technology for the industry. The Bank monitors and supports investments in this technology, whether for capturing emissions at the point of production or utilising captured carbon in new products.

To act upon such levers, Intesa Sanpaolo can rely on several strategic drivers:

- **Active engagement.** Engaging with the Bank's major clients on topics such as emissions disclosure, decarbonisation ambitions and targets, and plans to invest or apply decarbonisation technologies.
- **Sector consolidation.** Promoting industry consolidation to unlock synergies, strengthen investment capacity and accelerate the sector's decarbonisation pathway.
- **Supporting Industrial Plans for decarbonisation.** Promoting best practices among customers operating in the sector, to strengthen Industrial Plans, including those of less efficient operators undertaking concrete decarbonisation measures.
- **Transition Financing.** Providing ring-fenced loans for specific cement transition and decarbonisation solutions, expected to deliver significant impact as achieving full decarbonisation in the sector depends on the widespread adoption of emerging technologies.

CASE STUDIES

Banca dei Territori supports Cementeria Costantinopoli in driving sustainable energy and resource efficiency

Intesa Sanpaolo, through its Banca dei Territori Division, has granted an S-Loan of €10 million to Cementeria Costantinopoli to accelerate its sustainability strategy. The financing will support the construction of a 9.9 MWh wind power plant for self-consumption, the first project of this kind by an Italian corporate. This investment marks a decisive step towards low-carbon operations, cutting reliance on fossil fuels and reducing environmental impact, while also delivering operational benefits. Further environmental and social initiatives are planned in the coming years.

The transaction was structured through Intesa Sanpaolo's S-Loan, a sustainability-linked financing solution that incentivises companies to pursue ESG objectives by offering interest rate reductions upon commitment and achievement of specific environmental and social targets.

Cementeria Costantinopoli, founded in 1990 and based in Barile (PZ), is a leading cement producer serving the Italian market through integrated production facilities and a nationwide distribution network.

Intesa Sanpaolo backs Unicalce with €10mln S-Loan to drive low-carbon innovation

Intesa Sanpaolo, through its Banca dei Territori Division, is supporting the sustainable development of Unicalce with a €10 million S-Loan, featuring a rate reduction tied to the achievement of ESG improvement targets.

Unicalce is Italy's leading producer of lime, dolomitic lime and derived products, operating 11 plants across the country.

The financing aims to enable investments in energy saving, the use of fuels and energy from renewable and circular sources, and the development of new products with a reduced carbon footprint.

5 COMMERCIAL REAL ESTATE

5.1 SECTORAL CONTEXT[109]

In 2024, the building sector accounted for nearly 28% of final energy consumption globally. The sector's direct emissions stood at 2.8 Gt CO_2 accounting for ~7% of CO_2 emissions globally. Since 2010, emissions from commercial buildings have remained relatively stable, reflecting limited progress in energy efficiency and electrification. Commercial energy use increased by 2.7% in 2024 with rapid growth in the demand for heating and cooling outweighing the impacts of efficiency gains and electrification.

Across the EU, GHG emissions from commercial buildings decreased by 5% in 2023, largely due to reduced use of liquid fuels and efficiency improvements. However, this trend was not consistent across the region. In Italy, emissions from commercial buildings rose by approximately 9% over the same period. This uptick follows a sharp drop in 2022, suggesting a rebound in the commercial building operations and recovery after the energy and supply chain crisis.

While EU has shown decent progress in reducing emissions from commercial buildings, with direct emissions reduced by 23% as of 2023 versus 2015, the overall pace of decarbonisation remains slow to meet climate targets. EU renovation rates in commercial buildings remain low at 0.6% annually. According to the European Commission, deep renovations which could help reduce energy use by at least 60% are carried out only for 0.3% of the entire building stock per year, a pace still not sufficient in order to meet the 55% emissions reduction by 2030 as defined in the EU Commission goal and indicated in the Renovation Wave. Italy faces similar challenges, with over half of its non-residential buildings rated in the least efficient Energy Performance Certificate (EPC) categories (E to G).

The current investment trend is subdued. In 2023, global energy efficiency investments in buildings sector declined by 7% to $280 billion, driven by higher interest rates and the phase-out of major European incentive programs. Heat pump sales also slowed, falling by 5% in Europe, reflecting broader weakness in building-sector investment.

To close this gap and support the transition, EU has introduced several mechanisms. The revised Energy Performance of Buildings Directive (EPBD) implemented in 2024 introduces minimum energy performance standards for non-residential buildings, requiring renovation of 16% of the worst-

109 The sources of the data and information presented in this section include: IEA, 'Buildings', https://www.iea.org/energy-system/buildings; IEA, 'Breakthrough Agenda Report 2023', https://www.iea.org/reports/breakthrough-agenda-report-2023/buildings; EEA, 'Annual European Union greenhouse gas inventory 1990-2023 and inventory document 2025', https://www.eea.europa.eu/en/analysis/publications/annual-european-union-greenhouse-gas-inventory-2025; EEA, 'Total GHG emissions and removal in the EU', https://www.eea.europa.eu/en/datahub/datahubitem-view/3b7fe76c-524a-439a-bfd2-a6e4046302a2?activeAccordion=1091606; Bruegel, 'How to finance European Union's building decarbonisation plan', https://www.bruegel.org/sites/default/files/2024-10/PB%2012%202024_1.pdf; GFANZ, 'Net Zero Financing Roadmaps, Buildings Investment and Financing', https://assets.bbhub.io/company/sites/63/2021/10/NZFRs-Buildings-Brief.pdf; BPIE, 'Italy Buildings Climate Tracker: Is Italy on track to decarbonise its building stock?', https://www.bpie.eu/publication/italy-buildings-climate-tracker-is-italy-on-track-to-decarbonise-its-building-stock/; BPIE, 'Minimum standards Maximum impact', https://www.bpie.eu/wp-content/uploads/2023/05/Minimum-standards-maximum-impact_Final.pdf; IEA, 'World Energy Outlook 2025', https://www.iea.org/reports/world-energy-outlook-2025.

performing stock by 2030 and 26% by 2033. The upcoming Emissions Trading System (ETS2)[110] will extend carbon pricing to fuel use in buildings and transport. The EU Commission's Renovation Wave Strategy[111] aims to renovate 35 million buildings by 2030, encouraging national and local authorities to prioritise the worst-performing stock and use grants and subsidies to support upfront investments. Additionally, the European Energy Efficiency Financing Coalition, launched by the European Commission, brings together public and private stakeholders to improve access to capital and scale up investment in energy efficiency in building sector.

5.1.1 Key challenges

Key obstacles hindering building-sector decarbonisation include financial, infrastructural, and coordination challenges.

- **High upfront costs for technologies and retrofits.** Significant upfront costs for new technologies and retrofits remain a barrier for many building owners.
- **Need for clean energy access.** Buildings are among the largest global energy consumers, so cutting emissions requires not only installing new technologies but also developing renewable energy sources, smart grids, and storage systems to ensure clean and reliable energy access for the sector.
- **Diverse ownership complicates coordination.** Diverse ownership structures in commercial buildings complicate coordination of energy-efficiency upgrades, as priorities often differ.
- **Limited standardisation and accessibility of EPC data**. The absence of harmonised and easily available Energy Performance Certificate data complicates the assessment of building efficiency and makes it challenging for financial institutions to set and monitor decarbonisation targets.

5.1.2 Key enablers

- **Accelerating renovations.** Accelerating the decarbonisation of commercial buildings will require a significant increase in renovation activities. Measures like upgrading insulation, replacing outdated equipment, and integrating on-site renewables are essential, particularly for older and energy-intensive assets.
- **New generation technologies.** In parallel, a new generation of technologies is emerging with potential to drive more energy savings and operational efficiency, such as:
  - Building Energy Management Systems and Building Automation Systems: together, these systems monitor, control, and optimise energy use across Heating Ventilation and Air Conditioning systems, lighting, and other operations. By using real-time data, sensors, and automation, they help reduce energy waste and improve efficiency;
  - Predictive Maintenance: using AI and machine learning to detect early signs of equipment issues. By fixing problems before they escalate, buildings can avoid energy waste, reduce downtime, and extend equipment life.
- **Strong policy support and finance.** Given the scale of intervention required, strong policy support is essential. Without targeted subsidies, grants, and concessional financing, the transition will not be feasible at the pace required to reach Net Zero. According to Glasgow Financial Alliance for Net Zero (GFANZ), annual global investments in building decarbonisation will need to grow by three to four times to $700 billion between 2020 and 2050 to meet Net Zero. Building Performance Institute Europe (BPIE), leading think tank on energy performance of buildings, has estimated that a total renovation investment of €63 billion per year until 2050 would be required to renovate all commercial building stocks in EU-27.
- **Credit favouring the transition to sustainable assets.** Credit markets increasingly favour sustainably rated assets, while properties with low Energy Performance Certificates face growing challenges in securing debt financing.
- **Circular construction and materials reuse.** Adopting reuse and recycling of construction and demolition materials, rather than landfill disposal, can greatly reduce CO_2 emissions, support circular economy principles, and minimise waste.

110 ETS2 was intended to become operational in 2027, but a postponement to 2028 is currently being discussed by European institutions.
111 The Renovation Wave strategy aims to accelerate the rate and depth of energy renovations through measures including stronger incentives and legal certainty for owners and tenants, targeted funding, technical assistance for local authorities, smart and digital-ready upgrades, sustainable construction practices, renovation to address energy poverty, and the decarbonisation of heating and cooling systems.

5.2 TARGET AND PROGRESS UPDATE

In 2025, portfolio intensity in the Commercial Real Estate sector declined to 36.14 $kgCO_2e/m^2$, marking a 7% improvement from last year and a 16% decline from the baseline of 43.16 $kgCO_2e/m^2$. This progress reflects a gradual shift toward better EPC ratings and improved building performance, supported by financing solutions that encourage energy efficiency upgrades. Initiatives such as preferential terms for green projects and dedicated products for sustainable property renovation have contributed to this trend.

While these measures are helping accelerate decarbonisation, the portfolio remains behind its Net Zero target pathway, as sustained progress will require strong public policy action to complement private sector efforts. In particular, incentives for deep retrofits and robust regulatory frameworks for grid decarbonisation remain critical to achieving long-term targets.

5.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR COMMERCIAL REAL ESTATE DECARBONISATION

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.

To enable progress towards decarbonisation targets, the Bank has defined the following key financial initiatives:

- **Lending to support transition**, offering preferential financing terms for projects aimed at improving energy efficiency and implementing sustainable building solutions, such as installing renewable energy systems, enhancing insulation, and upgrading heating, ventilation and air conditioning systems.
  - Intesa Sanpaolo promotes financing products for small and medium sized enterprises, including **S-Loan Green Projects**, a financing solution launched in February 2024 specifically designed for the purchase and renovation of commercial and residential buildings used for business purposes, provided they meet high environmental standards:
    - LEED: gold level
    - BREEAM: good/very good level
    - HQE: very good/excellent level
    - CASBEE: level A (very good)/ S (excellent)
    - EPC: level A or B
- **Catalogue of financial offers suitable for the real estate sector, called 'Ædifica'**, also designed to meet the needs of real estate developers and builders who integrate environmental sustainability as a core element of their projects. The Bank also supports strategic initiatives involving industrial and institutional investors to amplify the economic, environmental and social impact of urban regeneration through investments and partnerships.
- **Dedicated program to actively steer the portfolio.** Intesa Sanpaolo is nearing the completion of an initiative to guide the portfolio toward high-performing energy classes (Class A). In particular, to strengthen the data foundation for Commercial Real Estate target setting and support these strategies, operational models have been updated to require energy certification (EPC) as part of the credit approval process. This initiative aims to support the Bank's physical intensity target and comply with EU regulations on energy class coverage, including the improvement of collateral quality and credit risk.
- **Additional financial instruments** to support the renovation, energy efficiency, and seismic retrofitting projects. The aim is to make a significant contribution to the energy saving and emission reduction targets set by Italy's integrated national energy and climate plan for 2030, by providing the possibility to transfer accrued tax credits to the Bank for immediate liquidity, avoiding delays in recovering deductions. Intesa Sanpaolo also offers advance financing for contractors, enabling companies that grant invoice discounts to access liquidity through a contract advance loan combined with tax credit assignment to the bank. Moreover, leveraging on Intesa Sanpaolo Rent Foryou, a Group's company, the Bank provides operational leasing solutions for technologies that optimise energy consumption (e.g., IoT sensors and software and Artificial Intelligence for regulating electrical systems) and enable conversion to sustainable energy (e.g., solar panels).

Alongside financial measures, Intesa Sanpaolo provides non-financial initiatives designed to guide clients through the transition, offering advisory support, partnerships, and tools to enhance sustainability performance. These include:

- **strategic advisory services**, delivered through dedicated agreements, to help clients identify sustainability improvements and leverage available government subsidies. Examples include:
  - **collaboration with Enel X, Regalgrid and Deloitte** aimed to incentivise companies to create and participate in Renewable Energy Communities (RECs), as well as give Intesa Sanpaolo the opportunity to financially support investments aimed at achieving the companies'

sustainability objectives (e.g., installation of renewable energy production plants).
  - deployment of **'Incent Now'**, an informative and free platform developed by Deloitte, made available for Intesa Sanpaolo clients, and aligned with the objectives of Italy's National Recovery and Resilience Plan (NRRP). In particular, the platform allows to identify available incentives and monitor calls for proposals.
- **data availability and quality improvement initiatives aimed at enhancing property-specific information** since specific and systematic process to obtain property specific data (including for Commercial Properties) is required. It is to be noted that in Italy a national registry of EPC labels on the total stock of real estate is not available;

Intesa Sanpaolo has also signed several strategic agreements, including:

- **renewal of the agreement with Confindustria**, with continued support for companies through €200bn in liquidity and a structured, extensive collaboration over the next four years also to accelerate sustainable transition and circular economy;
- **collaboration agreement with National Council of Shopping Centres (CNCC)** to encourage business investment in environmental sustainability and energy from renewable sources through the dissemination of CERs and Collective Self-Consumption.

CASE STUDY

Intesa Sanpaolo IMI CIB structures €615mln green financing to Immobiliare Grande Distribuzione

In February 2025, Intesa Sanpaolo, through its IMI Corporate & Investment Banking Division, took part in a €615 million pool loan to Immobiliare Grande Distribuzione, one of Italy's leading operators in the shopping centre sector.

The loan is classified as green under the company's Green Financing Framework, which is aligned with internationally recognised principles for green bonds and loans. Hence, the funds will be used to refinance eligible green projects defined within this framework. Specifically, proceeds are restricted to refinance the acquisition or construction of new buildings that have obtained minimum sustainable certifications, investments to improve energy efficiency, and installation of clean transportation infrastructure, including electric vehicle charging stations and cycling facilities.

As part of the transaction, IMI Corporate & Investment Banking Division acted as Mandated Lead Arranger, Global Coordinator, Green Loan Coordinator and Agent Bank, confirming its commitment to supporting companies in their transition toward sustainable growth.

6 IRON & STEEL

6.1 SECTORAL CONTEXT[112]

Steelmaking is among the most carbon-intensive industries, responsible for around 7% of global GHG emissions[113] and producing 2.8 gigatonnes of CO_2 in 2024 alone – a record high underscoring the sector's critical role in achieving climate targets. Yet it is also foundational to economic development and the green transition, providing the material backbone for infrastructure, transport, energy systems and advanced manufacturing.

Sector's emissions have risen steadily since 2015, driven by the increase in global demand, with production growth largely concentrated in China and India where traditional blast furnace–basic oxygen furnace (BF-BOF) route is more commonly adopted. Between 2023 and 2024, emissions were steady, even though steel output decreased slightly (-1%). This highlights the sector's structural dependence on high-emission processes. Coal still dominates the energy mix for steelmaking, providing 73% of the energy, with electricity (14%), natural gas (8%), oil (1%) and other sources (3%) making up the remainder.

Among major steel-producing nations, Italy has the lowest emissions intensity, emitting only 0.7 tonnes of CO_2 emissions per tonne of steel, compared to a global average of 1.5. This is thanks to strong energy efficiency and a production model based on recycling: more than 85% of Italian steel comes from scrap processed in electric arc furnaces (EAF).

Looking ahead, the outlook is challenging. To align with the International Energy Agency's Net Zero pathway, the sector must cut both absolute emissions and intensity by 3% per year on average by 2035, compared to 2024 levels. While by 2050, both intensity and total emissions need to fall by over 90%.

However, the transition faces headwinds. New high-emission blast furnaces (~65 million tonnes capacity), particularly in Southeast Asia and India, are still planned by 2026, while near-zero steel production needs to scale rapidly to close a gap of around 15 million tonnes by 2030. The financial implications are significant: global decarbonisation of steel could require $3.6 trillion in additional investment by 2050, with most funding needed for clean energy infrastructure such as green hydrogen and renewable power.

Policy frameworks and partnerships will be critical. The EU Clean Steel Partnership is mobilising over €1.7 billion from public and private sources to support breakthrough technologies from pilot to demonstration scale. India has introduced a Green Steel Taxonomy to guide sustainable investments and strengthen disclosure standards, alongside its Perform, Achieve and Trade (PAT) scheme, which sets energy efficiency targets and enables trading of energy-saving certificates. These measures, together with carbon pricing and border adjustment mechanisms such as the EU CBAM and the US Foreign Pollution Fee Act, are shaping incentives and competitiveness. At the same time, scrap recycling has become a strategic priority, with acquisitions accelerating as companies pivot to circular production models.

The sector stands at a crossroads. It is essential for economic development, yet its carbon footprint is incompatible with climate goals unless decisive action is taken. Hence, the pathway to near-zero steel demands more innovation, investment, and collaboration across governments, industry and the wider ecosystem.

6.1.1 Key challenges

In order to achieve Net Zero, the sector's main challenges are:

- **Energy-intensive and coal-reliant.** Steelmaking is highly energy-intensive, relying mainly on coal. Replacing coal and coke with cleaner alternatives like green hydrogen or electricity requires a major increase in their availability.
- **High costs and varying maturity technologies.** Technologies to cut emissions in steel face high upfront costs and are at varying maturity levels, creating uncertainty around innovation and future expenses.
- **Limited low-/near-zero pipeline.** The pipeline of low- and near-zero emission projects remains limited.

112 The sources of the data and information presented in this section include: World Economic Forum, 'Steel industry net-zero tracker', https://reports.weforum.org/docs/WEF_Net_Zero_Industry_Tracker_2024_Steel.pdf; IEA, 'Tracking Steel', https://www.iea.org/energy-system/industry/steel; Federacciai, 'Rapporto di Sostenibilità 2023', https://federacciai.it/rapporto-di-sostenibilita-2023/; Cassa Depositi e Prestiti, 'The Italian steel industry across national and European challenges: what prospects for development?', https://www.cdp.it/resources/cms/documents/CDP-Brief-Italian-Steel-Industry-ENG.pdf; IEA, 'Accelerating Sector Transitions Through Stronger International Collaboration', https://iea.blob.core.windows.net/assets/6633c3f9-2fdc-473b-a472-e2e91cba85ba/BreakthroughAgendaReport2024.pdf; IEA, 'World Energy Outlook 2024', https://iea.blob.core.windows.net/assets/140a0470-5b90-4922-a0e9-838b3ac6918c/WorldEnergyOutlook2024.pdf; MIT Technology Review, 'This startup just hit a big milestone for green steel production', https://www.technologyreview.com/2025/03/12/1113130/green-steel-boston-metal/; ArcelorMittal, 'ArcelorMittal and John Cockerill announce plans to develop world's first industrial scale low temperature, iron electrolysis plant', https://corporate.arcelormittal.com/media/press-releases/arcelormittal-and-john-cockerill-announce-plans-to-develop-world-s-first-industrial-scale-low-temperature-iron-electrolysis-plant; European Steel Technology Platform, 'About the Clean Steel Partnership', https://www.estep.eu/clean-steel-partnership; S&P Global, 'India unveils classification criteria for green steel', https://www.spglobal.com/commodity-insights/en/news-research/latest-news/metals/121324-india-unveils-classification-criteria-for-green-steel; IEA, 'World Energy Outlook 2025', https://www.iea.org/reports/world-energy-outlook-2025.

113 The 7% figure reflects steelmaking's share of total global greenhouse gas emissions. The Climate Report 2024 figure (25%) refers instead to steelmaking's share of global industrial emissions only.

6.1.2 Key enablers

Achieving the sector's decarbonisation will require a mix of mature and emerging technologies:

- **Scrap-based EAF steelmaking powered by renewables.** EAF steelmaking using scrap eliminates iron ore processing, the most emissions intensive step in conventional steelmaking, and delivers very low emissions when powered by renewables. This route is widely deployed in regions with strong scrap supply chains, but global scrap availability and quality constraints limit scalability.
- **Material efficiency strategies to curb demand.** Material efficiency strategies such as improving steel yields, using lighter materials, and extending product lifetimes can curb demand growth without compromising quality.
- **Green-hydrogen DRI combined with EAF.** Direct reduced iron (DRI) using green hydrogen replaces coal in the reduction process and emits water vapor instead of CO_2 emissions. Combined with EAF, it enables near zero emissions for primary steelmaking. This technology is at prototype stage and requires large scale green hydrogen production, renewable power infrastructure and high-grade iron ore. Demonstration projects show feasibility, but cost and infrastructure remain major hurdles.
- **CCUS for BF-BOF operations as a transitional solution.** Carbon Capture, Utilization and Storage (CCUS) can capture a significant share of emissions from existing BF-BOF operations, providing a transitional solution while cleaner technologies scale up. Deployment depends on transport and storage infrastructure, high capital investment and supportive policy frameworks.

Beyond these routes, breakthrough technologies are emerging:

- **Molten Oxide Electrolysis (MOE)** uses electricity instead of carbon to separate iron from oxygen in ore, eliminating process emissions entirely;
- **low temperature electrolysis** aims to produce iron plates at lower energy intensity, with industrial scale production targeted for 2027.

6.2 TARGET AND PROGRESS UPDATE

The portfolio's emission intensity remains aligned with the respective Net Zero target pathway, despite a 10% increase in 2025 to 0.90 tCO_2/t of steel from 0.82 last year. Some volatility in portfolio intensity is anticipated, given the wide range of emission efficiencies across counterparties in this sector. The increase followed a 2024 level that was already close to the 2030 target, underscoring volatility in a hard-to-abate industry characterised by significant variability in emissions intensity among producers. Importantly, current intensity is still approximately 14% below the baseline of 1.05 tCO_2/t, largely due to significant exposure to European and Italian producers, which represent approximately 75% of the portfolio and rely heavily on scrap recycling. This production process substantially reduces emissions compared to primary steelmaking. In addition, a significant share of financed emissions is associated with counterparties that have clear reduction targets and initiated tangible decarbonisation measures, such as renewable energy integration, increased scrap utilisation, and early-stage adoption of hydrogen-based steelmaking.

6.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR IRON & STEEL DECARBONISATION

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.** Focus on counterparties pursuing ambitious decarbonisation pathways prioritising those with science-based, independently verified emission reduction targets. By collaborating with industry leaders and supporting forward-looking organisations and counterparties which show measurable progress, robust transition plans, and transparent reporting frameworks, the Bank aims to drive industry-wide progress and encourage broader adoption of robust climate strategies.
- **Dedicated financing to support decarbonisation solutions.** Actively support decarbonisation solutions with dedicated financing. The transition to a low-carbon Iron & Steel industry requires substantial investments in research, technology and infrastructure. The Bank supports initiatives that advance breakthrough solutions such as hydrogen-based direct reduction steel production, near-zero technologies, low emission

materials, high-efficiency electric furnaces, CCUS solutions, and, fostering the development of cleaner production methods that deliver long-term emissions reductions.

- **Client engagement and accessing tailored transition financing.** Promote client engagement on themes such as defining Net Zero Targets, implementing decarbonisation strategy and access to tailored financing for transition solutions. These include energy efficiency improvements, renewable energy integration, digital optimisation systems and green innovation.

In 2025, the Group also launched a specific initiative to provide targeted financing for innovative decarbonisation technologies in the Iron & Steel sector. The initiative supports client transition efforts and reduces portfolio carbon intensity, thereby advancing the Bank's net zero strategy.

CASE STUDIES

IMI Corporate & Investment Banking participates in a $1.25 billion syndicated green loan in Mexico

Intesa Sanpaolo, through its IMI Corporate & Investment Banking Division, acted as Mandated Lead Arranger and Bookrunner for a syndicated green loan in Mexico.

The bank structured and partially underwrote a $1.25 billion facility in collaboration with a pool of international banks to support Ternium. The proceeds will finance the design, construction, operation, and maintenance of a new steelmaking facility located in the Industrial Center of Pesquería, Mexico: In particular, the project aims to reduce plant-related emissions through the retrofitting of the DRI–EAF facility with CCUS technology.

A portion of the loan will also be allocated to fund or refinance capital investments, operating expenses, and research and development initiatives.

The transaction was structured with multiple stakeholders across different jurisdictions and ensuring compliance with the Green Loan Principles of the Loan Market Association.

Sustainability-linked financing for Feralpi: Intesa Sanpaolo supports low-emission steel

Intesa Sanpaolo, through its IMI Corporate & Investment Banking Division, participated in a €170 million pool loan to Feralpi Siderurgica ('Feralpi'), one of Europe's leading steel producers. The transaction is aimed at supporting the company's 2022-2026 business plan focused on low emission and more competitive steelmaking. In particular, the underlying investments aim to broaden the product range to reduce CO_2 emissions, increase efficiency and production capacity, and enhance industrial and commercial flexibility.

The financing was structured as a Sustainability-Linked Loan, designed with a margin adjustment mechanism tied to the achievement of ESG performance indicators. One of these is the ratio of the company's emissions (including Scope 1, Scope 2 market-based, and selected Scope 3 emissions as defined by SBTi for the Iron & Steel sector) to the total production output of the Feralpi's rolling mills.

Alongside other banking institutions, Intesa Sanpaolo acted as Lender, Global Coordinator, Mandated Lead Arranger, Bookrunner and Sustainability Coordinator, confirming its role in promoting sustainable growth within the steel industry.

7 OIL & GAS

7.1 SECTORAL CONTEXT[114]

Despite the rapid scale-up of new technologies and record renewable installations for the twenty-third consecutive year in 2024, the oil and gas sector continues to play an important role in global energy systems, accounting for 39% of additional yearly power demand in 2024. At the same time, recent progress in low-carbon technology deployment, such as solar, wind, electric vehicles and heat pumps, is gradually reducing the reliance on fossil fuels. These advances show that the shift towards lower oil and gas emissions is underway, even if further action is needed to meet climate goals.

In 2024, global demand reached approximately 100 million barrels per day (mb/d), with consumption growth slowing sharply to 0.8% (from +1.9% in 2023). Most of this increase came from chemical feedstocks and aviation, whereas transport-related oil use stayed flat compared to 2019 levels despite global GDP expansion, confirming the positive impact of efficiency gains and electrification. Under the IEA *Current Policies Scenario* (CPS), which reflects only policies and measures that are currently enacted and implemented, without assuming any additional policy developments, global oil demand is projected to increase to approximately 105 mb/d by 2035 and 113 mb/d by 2050, implying an average annual growth of around 0.5 mb/d. As the transport and power generation sectors increasingly shift toward alternative energy sources, the CPS indicates that petrochemicals are expected to become the main contributor to oil demand growth, together with other industrial uses and the aviation sector.

Demand growth was well below pre-pandemic levels due to structural factors such as the end of the mobility recovery from the COVID pandemic, weaker industrial activity driven by subdued global demand, high input costs, and policy uncertainty, and the rising penetration of electric vehicles. Following this deceleration, oil's share of global energy demand fell to a record low of under 30%, down from its peak of 46% half a century ago. This decline has been largely possible also thanks to the rapid growth of renewables, which accounted for the largest share (38%) of the growth in power demand over the year.

Emissions related to fuel extraction and processing in 2024 accounted for approximately 11% globally and about 6% within the European Union, relative to total emissions. Global oil-related CO_2 emissions rose by 0.3% reaching 11.4 Gt CO_2, primarily driven by petrochemical feedstocks. This increase was not uniform across geographies. In advanced economies, oil emissions declined slightly by 0.5%, while emerging markets and developing economies recorded a 0.3% rise, reflecting higher energy demand linked to rapid economic and population growth.

Natural gas emissions followed a similar pattern, increasing by 0.9% in advanced economies and by 3.7% in emerging markets and developing economies, resulting in a 2.4% rise globally.

Under IEA's Net Zero Emissions by 2050 (NZE) scenario, oil demand falls to 24 mb/d in 2050 (–73% versus 2020), while natural gas falls to around 1,700 billion cubic metres (–56% versus 2020). In addition, about $600bn of cumulative spending would be required to halve the emissions of the sector's operations globally by 2030, with less than $80bn allocated to methane and flaring abatement projects.

7.1.1 Key challenges

The oil and gas sector faces a complex challenge: reducing emissions while continuing to meet growing oil demand in an evolving global energy landscape. This complexity is amplified by structural market dynamics, technological limitations, financial constraints and policy uncertainty that slow the pace of transition:

- **Technology readiness.** Decarbonisation technologies such as carbon capture, utilisation and storage (CCUS), low-emissions hydrogen, and renewable integration remain far from commercial scale. Current CCUS capacity captures just over 50 Mt CO_2 annually, and low-emissions hydrogen accounts for less than 1% of global production, underscoring the need for accelerated deployment and cost reductions.
- **Investment allocation.** R&D expenditure by corporations operating in energy-related sectors exceeded $160 billion globally, but growth slowed to just 1%—the weakest pace since 2015, apart from the pandemic year. This deceleration reflects higher capital costs, tighter budgets, and a shift away from riskier, long-term research projects. Spending cuts were evident in areas such as renewable equipment, while fossil fuel companies continue to allocate less than 2% of revenues to R&D, given the maturity of current production approaches and limited profitability of new innovations. This slowdown suggests that many companies are

114 The sources of the data and information presented in this section include: IEA, 'Global Energy Review 2025', https://iea.blob.core.windows.net/assets/5b169aa1-bc88-4c96-b828-aaa50406ba80/GlobalEnergyReview2025.pdf; IEA, 'The Oil and Gas Industry in Net Zero Transitions', https://iea.blob.core.windows.net/assets/f065ae5e-94ed-4fcb-8f17-8ceffde8bdd2/TheOilandGasIndustryinNetZeroTransitions.pdf; IEA, 'Net Zero by 2050: A Roadmap for the Global Energy Sector', https://iea.blob.core.windows.net/assets/deebef5d-0c34-4539-9d0c-10b13d840027/NetZeroby2050-ARoadmapfortheGlobalEnergySector_CORR.pdf; IEA, 'EU Regulation on the reduction of methane emissions in the energy sector', https://www.iea.org/policies/18209-eu-regulation-on-the-reduction-of-methane-emissions-in-the-energy-sector; European Commission, 'REPowerEU', https://commission.europa.eu/topics/energy/repowereu_en; IEA, 'World Energy Investment 2025', https://iea.blob.core.windows.net/assets/1c136349-1c31-4201-9ed7-1a7d532e4306/WorldEnergyInvestment2025.pdf; IEA, 'Monthly Oil Data Service (MODS) Complete', https://www.iea.org/data-and-statistics/data-product/monthly-oil-data-service-mods-complete; EUJRC, 'GHG emissions of all world countries', https://edgar.jrc.ec.europa.eu/report_2025#data_download.

prioritising short-term returns over transformative technologies, limiting progress on solutions critical for decarbonisation.

- **Policy uncertainty.** Energy policy developments remain uneven and sometimes contradictory. In the EU, regulatory debates increasingly focus on affordability and competitiveness alongside climate targets, while in other regions recent policy shifts have rolled back support for renewables and efficiency measures. Clear and consistent policy signals are essential to steer investment toward clean energy and ensure alignment with long-term climate objectives.

7.1.2 Key enablers

Achieving Net Zero requires a rapid scale-up of renewables as the primary lever for decarbonisation. In IEA's Net Zero Emissions by 2050 (NZE) scenario, tripling global renewable capacity by 2030 delivers the largest emissions reductions, alongside electrification and efficiency improvements. In addition, complementary technologies can further reduce emissions from oil and gas operations. Five key levers underpin this decarbonisation strategy:

- **Methane emissions reduction.** Reducing methane emissions from leaks and venting, using technologies such as leak detection and repair (LDAR), improved equipment design, and vapor recovery units.
- **Ending non-emergency flaring.** Ending non-emergency flaring, the routine burning of natural gas released during oil production.
- **Electrifying upstream facilities.** Electrifying upstream facilities with low-emissions power, increasingly sourced from renewables such as solar PV and wind, and supported by grid decarbonisation and battery storage.
- **CCUS for residual emissions.** Carbon capture, utilisation and storage (CCUS) systems, deployed to address residual emissions as a complementary measure in the decarbonisation pathway.
- **Low-emissions hydrogen in refineries.** Expanding the use of low-emissions electrolysis hydrogen in refineries.
- **Electrification technologies.** Deploying heat pumps and other electrification technologies to reduce thermal energy demand in industrial and commercial processes.

The effectiveness of these measures depends on complementary policy action that provides clear standards and investment signals. Regulatory frameworks are evolving to support this transition. For instance, the EU Methane Regulation, being phased in, introduces strict monitoring, reporting and verification requirements, bans routine venting and flaring, and will apply methane intensity thresholds to imports starting in 2030, with penalties of up to 20% of annual turnover for non-compliance. In addition, Italy has banned new oil and condensate exploration and production concessions. Finally, complementary initiatives under REPowerEU aim to scale renewables and hydrogen, reducing reliance on fossil fuels and reinforcing the sector's transition.

7.2 TARGET AND PROGRESS UPDATE

The physical intensity of the oil and gas portfolio remained broadly stable at 62.65 gCO_2e/MJ, showing a decline of 1.6% compared to 2024. Overall exposure decreased by more than 10% in 2025, which contributed to a 14% reduction in financed emissions year-on-year and a 76% reduction compared to the baseline. The stability in intensity reflects sector-wide dynamics, where progress toward deep decarbonisation has been limited. Growing energy security priorities and structurally higher power demand from AI and data center expansion have strengthened the role of conventional fuels, moderating the pace of decline and prompting upward revisions to peak consumption expectations, notably for natural gas.

7.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR OIL & GAS DECARBONISATION

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. More specifically, in the oil and gas sector, the Group's priorities include:

- **Advancing low carbon solutions and grid integration.** Advancing low-carbon solutions and driving investment toward technologies such as green hydrogen, renewable energy, and their integration into the energy grid.
- **Improving efficiency across existing facilities.** Backing initiatives that lower consumption and improve energy efficiency across the sector's existing facilities.
- **Monitoring transition plans and scaling back Oil & Gas.** Analyse counterparties' transition plans evaluating the strength of their decarbonisation strategies. In addition, Intesa Sanpaolo has established a policy framework to gradually scale back the provision of financial services to oil and gas companies, setting limits and exclusions related to the Bank's lending activities related to counterparties operating in

the sector. In particular, the Group has published 'Rules on Oil & Gas Sector', defining restrictive exclusion criteria related to new financing to unconventional resources[115]. The Group confirms the completion by 2025 of the phase-out of existing exposures to unconventional resources subject to exclusion in accordance with the policy.

8 POWER GENERATION

8.1 SECTORAL CONTEXT[116]

Power generation is the leading sector in the net-zero transition, driven by record renewable growth. According to IEA forecasts, global renewable electricity generation will increase by 60%, rising from 9,900 TWh in 2024 to 16,200 TWh in 2030. More than half of this growth will come from solar PV, followed by wind at 32%. The share of electricity from renewables is expected to rise from 32% in 2024 to 43% in 2030.

In 2024, electricity demand surged by 4.3% globally, marking the largest increase outside the post-COVID rebound. This growth was driven by record temperatures, industrial expansion, transport electrification, as well as rising consumption from data centres and AI.

As a result of this increased demand, global CO_2 emissions of the sector rose by 1%, although this was a slower pace compared to the 1.4% rise seen in 2023. The uptick is also attributed to a 1.3% growth in fossil fuel-based generation, even as renewables experienced robust expansion. In particular, renewable electricity generation grew by approximately 10%, with solar leading the way (+30%) thanks to significant cost reductions in recent years. Low-emissions energy technologies, deployed since 2019, are now estimated to prevent 2.6 Gt CO_2 annually, equal to 7% of global emissions.

Despite the increase in global CO_2 emissions, the sector's emissions intensity fell sharply, with a record 3% reduction in 2024 compared with 2023. This improvement reflects that the rapid growth in renewables and nuclear power contributed to mitigating the increase in overall electricity demand. Indeed, renewables managed to cover the largest part (38%) of additional yearly consumption, followed by natural gas (28%), coal (15%), oil (11%), and nuclear (8%).

These global dynamics are mirrored in the European Union, where structural shifts in generation mix are driving intensity improvements. In 2024, the sector accounted for about 20% of total EU emissions. Between 2023 and 2024, the fossil share of electricity generation declined from 32% to 28%, renewables rose from 44% to around 47%, while nuclear remained stable at approximately 24%[117]. Consequently, EU emissions intensity improved from 207 gCO_2/kWh to 187 gCO_2/kWh.

115 Unconventional resources defined as shale/tight oil, shale/tight gas, tar sands/oil sands, coal bed methane/coal seam gas.

116 The sources of the data and information presented in this section include: IEA, 'Renewables 2025', https://www.iea.org/reports/renewables-2025; IEA, 'Electricity 2025', https://www.iea.org/reports/electricity-2025; European Commission, 'Quarterly report on European electricity markets', https://energy.ec.europa.eu/document/download/139371bf-b50b-4fd4-afd1-761b782a0703_en?filename=Quarterly%20report%20Q4%202024%20Electricity.pdf; IEA, 'World Energy Outlook 2025', https://iea.blob.core.windows.net/assets/af5ac385-8fce-4cc7-8c73-107a3aade95e/WorldEnergyOutlook2025.pdf; European Commission, 'Renewable Energy Directive', https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en; MASE, 'Piano Nazionale Integrato per l'Energia e il Clima', https://www.mase.gov.it/portale/documents/d/guest/pniec_2024_revfin_01072024-errata-corrige-pulito-pdf; Terna, 'Scenario e contesto di mercato', https://www.terna.it/it/investitori/strategia/scenario-contesto-mercato; MASE, 'Entra in vigore il decreto FER X transitorio', https://www.mase.gov.it/portale/documents/d/guest/dm_30_dicembre_2024-pdf; Terna, 'Disciplina del meccanismo di approvvigionamento di capacità di stoccaggio elettrico', https://download.terna.it/terna/Disciplina%20MACSE_8dd5cc80c511758.pdf; European Commission, 'Commission approves an Italian State aid scheme to support renewable electricity production to foster the transition to a net-zero economy', https://ec.europa.eu/commission/presscorner/detail/en/ip_24_6432; Joint Research Centre – European Commission, 'GHG emissions of all world countries', https://edgar.jrc.ec.europa.eu/report_2025#data_download; European Environment Agency, 'Greenhouse gas emission intensity of electricity generation in Europe', https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emission-intensity-of-1?activeAccordion=309c5ef9-de09-4759-bc02-802370dfa366; IEA, 'Global Energy Review 2025', https://www.iea.org/reports/global-energy-review-2025/co2-emissions?.

117 The percentages referring to the fossil, renewable and nuclear shares of electricity generation do not sum to 100% due to rounding.

8.1.1 Key challenges

Despite strong momentum for renewables deployment, the sector may still face some challenges in achieving its environmental transition.

- **Rising capital costs.** Capital costs have risen globally: the 2023 spike in interest rates, after a decade of low inflation, has made generating attractive risk-adjusted returns harder, especially for capital-intensive clean energy projects reliant on debt financing. Going forward, data suggests inflation may come under control, particularly in the EU, with central banks likely to continue lowering interest rates and paving the way for a generally more favourable environment.
- **Curtailment and grid flexibility.** The rapid growth of wind and solar PV is driving higher curtailment, highlighting the need for greater grid flexibility. Where grid upgrades lag behind renewable deployment, curtailment risks rise. While battery storage investment is increasing, additional measures like long-term storage and large-scale demand response remain essential for efficient integration.
- **Permitting and regulatory support.** Permitting and regulatory issues that concern advanced technologies like nuclear fusion and green hydrogen need strong government support over the next decade. Green hydrogen, in particular, requires infrastructure to link producers with consumers and drive demand in new sectors such as transport and power.

8.1.2 Key enablers

According to IEA's Net Zero Emissions by 2050 (NZE) scenario, the sector requires an acceleration in decarbonisation efforts globally, but it can leverage technologies available today.

- **Clean energy levers.** In fact, more than 80% of the emissions reductions required by 2030 can be achieved by mainly focusing on rapidly expanding renewable energy, enhancing energy efficiency, and increasing electrification. Among there, the most significant contribution to reducing the sector's environmental impact is expected to come from the growth of global installed renewable capacity, supported by Net Zero objectives and energy security policies. To support such rapid expansion, annual clean energy investments need to more than triple by 2030 to more than $4 trillion worldwide.
- **Climate-aligned policies.** In addition, despite recent political uncertainty, momentum for climate-aligned policies continues to build at the EU level, laying the groundwork for a faster energy transition. The EU Renewable Energy Directive aims to raise the share of renewable energy to at least 42.5% of the Union's total gross final consumption of energy by 2030, supporting growing demand from businesses and households. Moreover, from 2026, imports of electricity and other carbon-intensive goods will face a carbon price aligned with the EU ETS, discouraging high-emission imports and incentivising low-carbon generation. This measure is expected to protect EU producers from competitive pressures while encouraging other jurisdictions to lower emissions. In parallel, a revision of the Energy Taxation Directive in 2025 is undergoing to align energy taxation with climate objectives, promote clean technologies, and phase-out exemptions that currently favour fossil fuels.
- **Italy's National Integrated Energy and Climate Plan (PNIEC).** Complementing these regulatory shifts, in Italy, the National Integrated Energy and Climate Plan (PNIEC) aims for about 40% of gross final energy consumption to come from renewable sources by 2030. As of 2024, renewable energy sources account for approximately 20% of Italy's total gross energy consumption. The Plan itself also targets doubling installed solar and wind capacity by 2030, increasing from the current 50 GW to 107 GW. These national goals are supported by legislative measures such as the 'FER X Decree' and 'MACSE', which promote renewable energy and electricity storage through competitive mechanisms and long-term contracts to drive the energy transition and ensure system flexibility. Italy has also secured around €10 billion in EU aid to accelerate renewable deployment, targeting circa 18 GW of new capacity across wind, solar, hydropower, and sewage gas installations within the next three years.

8.2 TARGET AND PROGRESS UPDATE

In 2025, the physical intensity of Intesa Sanpaolo's Power Generation portfolio fell over 11% versus 2024 to 108.47 $kgCO_2e/MWh$, remaining well below the respective Net Zero target pathway. This progress has been achieved due to two key factors: growing investments in renewables, now accounting for over 60% of the sector exposure and a growing share of counterparties operating at lower emission intensities, thanks to lower share of fossil fuel in their energy mix..

Table 1. Share of the sector exposure of Renewable clients in portfolio

	2023	2024	2025
Renewables (Green) counterparties	53%	59%	62%

8.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR POWER GENERATION DECARBONISATION

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.

Active financial support

The Group combines strong advisory expertise on major European and international renewable energy projects with tailored financing solutions to support both mature and emerging technologies.

- The Bank offers a broad suite of **financing options tailored to support the sector's solutions in sustainable infrastructure and renewable energy**. In particular, it provides competitive terms via dedicated products (e.g., green bonds) and financial solutions (e.g., green credit facilities) that enable projects in clean energy initiatives such as solar, onshore and offshore wind, and battery storage. The increasing share of green loan originations in the sector underscores the Bank's commitment to assisting the clients in their transition journey.
- Beyond mature technologies, **Intesa Sanpaolo actively supports early-stage projects, tracking and backing next-generation clean solutions,** such as green hydrogen.

Multistakeholder engagement

Intesa Sanpaolo collaborates with a wide range of stakeholders to promote the sector's decarbonisation. This includes engaging actively with industry participants, policymakers and communities to ensure an inclusive and robust transition toward sustainable energy solutions. By building strong partnerships, the Group aims to amplify the impact of decarbonisation efforts across both industry and society.

- **Collaborating with Multilateral Development Banks (MDBs)** provides Intesa Sanpaolo access to extensive resources, financial instruments, and local expertise, enabling the Bank to support large-scale initiatives aligned with its sustainability goals. Through joint efforts, the Group can take part in complex projects that would be too challenging for a single institution, such as cross-border ventures requiring significant funding and risk-sharing. Working with MDBs also strengthens the Bank's ability to finance critical infrastructure in underserved areas, deepen its market knowledge and leverage shared best practices in sustainable finance. For instance, in October 2025, Intesa Sanpaolo signed two agreements with the European Investment Bank totalling €750 million, aimed at supporting the construction of renewable energy plants with a capacity of up to 2 GW and mobilising over €4.5 billion of investment in the real economy.
- In addition, **Intesa Sanpaolo actively engages in Public-Private Partnerships** to combine institutional priorities with private-sector investment and expertise. These partnerships create a platform for pooling resources, sharing risks, and leveraging complementary strengths to deliver solutions for complex sustainability challenges such as smart grids and sustainable urban planning. For example, to encourage investment in renewable energy projects, particularly solar and wind, the Bank has launched a new initiative in partnership with SACE. This program offers companies project financing of up to €50 million, with SACE providing guarantees for up to 50% of the financed amount.
- The Group **participates in a variety of climate action groups, energy councils and industry bodies** to strengthen collaboration and accelerate the clean energy transition. By participating in these forums, the Bank remains updated on new trends, regulatory developments, and technological innovations, ensuring that its strategies and its partners' strategies are aligned with latest Net Zero targets.
- Intesa Sanpaolo has also launched 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.

- Furthermore, Intesa Sanpaolo has also **signed several strategic agreements**, including a collaboration protocol with 'Associazione Nazionale Comuni Italiani' (ANCI) to promote the diffusion of Renewable Energy Communities, as well as a collaboration agreement with 'Gestore dei Servizi Energetici' (GSE) aimed at fostering the integration of ESG and sustainable development in the financial sector and national business network.

Finally, the Bank is also involved as a **strategic advisor** to Italian and international clients on energy transition transactions, supporting the decarbonisation of the energy mix.

CASE STUDIES

Intesa Sanpaolo finances New York's largest solar project

Intesa Sanpaolo, through its IMI Corporate & Investment Banking Division, acted as Coordinating Lead Arranger, Bookrunner and Co-Syndication Agent for a landmark renewable energy transaction in the United States. The bank structured and partially underwrote, together with a pool of international banks, an $870 million long-term facility supporting Greenbacker Renewable Energy Company to acquire, construct and operate Cider, the largest solar photovoltaic park in the state of New York.

The agreement enables Greenbacker, a specialist in clean energy generation and energy transition investments, to take ownership of the Cider project from Hecate Energy, one of America's leading renewable developers. With a planned capacity of 500 MWac (674 MWdc), the park will supply electricity to more than 120,000 medium-sized homes and is expected to enable the creation of hundreds of jobs in the renewable energy production sector.

This transaction strengthens Intesa Sanpaolo's role in the US renewable energy market, following major financings such as SunZia, the largest clean energy infrastructure in the Western Hemisphere.

Intesa Sanpaolo International Bank Division supports Prime Batteries technology expansion

In 2025, Intesa Sanpaolo, through its International Bank Division, arranged a €25 million working capital facility to support Prime Batteries Technology, a leading European producer of energy storage systems, in implementing its new production capacity. The facility is secured with 20% cash collateral and an 80% state guarantee, designed to support projects that are aligned with the European Green Deal and national energy transition goals.

The rationale for this transaction lies in the proportional increase in working capital requirements following the start of production at Prime Batteries Technology's new factory, which expands capacity from 300 MWh to 2.3 GWh. This investment is part of a broader €800 million plan to reach 6 GWh total capacity, reinforcing the company's role in advancing Europe's decarbonisation targets.

Prime Batteries Technology operates a vertically integrated smart factory powered by renewable energy, leveraging advanced manufacturing and process optimisation to significantly reduce production costs.

9 RESIDENTIAL REAL ESTATE

9.1 SECTORAL CONTEXT[118]

Globally, building operations account for over a quarter of final energy use, with residential buildings alone responsible for nearly 70% of the sector's CO_2 emissions. In 2024, electricity confirmed its position as the dominant energy source in the building sector, accounting for 39% of total consumption, and natural gas use remained stable at around 23%. Residential energy use increased by 1.6% in 2024 from 2023 levels driven by rising ownership of appliances and extreme weather.

In Europe, buildings account for 40% of annual EU energy consumption and contribute 36% of energy-related GHG emissions. In 2023, direct residential emissions fell by 9%, and energy consumption dropped by 24%, influenced by both mild weather and elevated energy prices. Italy saw similar trends, with a 12% reduction in residential emissions and a 14% drop in energy consumption.

Despite these recent improvements, the sector's decarbonisation remains slow and is not on track to reach Net Zero. Poor energy efficiency and low renovation rates remain major barriers. Across the EU, more than 80% of buildings were built before the introduction of energy standards under EU Directive 2002/91/EC, and nearly 75% of buildings are energy inefficient[119]. While 85% of current stock is expected to remain in use by 2050, the renovation rates remain low at 1% annually, well below what is needed to align with climate goals. Nearly 42% of Italy's residential floor area is over 50 years old, and energy labels E to G dominate 70% of existing residential EPCs, highlighting the urgent need for large-scale renovation.

The IEA estimates that 20% of existing buildings must be renovated to zero-carbon-ready[120] levels by 2030 for the sector to be on track for Net Zero.

Achieving this will require deep retrofits of older and inefficient buildings, and homeowners cannot be expected to bear the full cost alone. The European Commission estimates that to meet 2030 energy efficiency targets, an average annual renovation rate of 5.1% is required for the residential sector. Achieving this would demand a total investment of approximately €4.72 trillion by 2030. Public investment, targeted subsidies, and accessible financing are necessary to enable this transition. Without strong government support, achieving net-zero goals in the building sector will not be feasible.

9.1.1 Key challenges

The RRE sector faces several significant challenges in its efforts to decarbonise:

- **High upfront costs.** Renovations to improve energy performance often require substantial investment, such as retrofitting, installing heat pumps, or adding solar panels. These costs can be prohibitive for many homeowners, particularly low-income households.
- **Dependence on a clear and supportive policy framework.** Incentives, streamlined procedures, and consistent guidelines are critical to accelerate adoption of energy-efficient technologies. Uncertainty or lack of clarity in these mechanisms can slow progress and discourage investment.
- **Limited standardisation and accessibility of EPC data.** The absence of harmonised and easily available Energy Performance Certificate data complicates the assessment of building efficiency and makes it challenging for financial institutions to set and monitor decarbonisation targets.

9.1.2 Key enablers

Achieving meaningful progress will require a significant scale-up in renovation-related investments and the deployment of solutions across key domains such as:

- **Thermal performance.** Enhancing building envelopes through advanced insulation and energy-efficient glazing to reduce heat loss and lower energy demand.
- **Low-carbon heating and cooling.** Replacing fossil-fuel systems with electric heat pumps and high efficiency Heating Ventilation and Air Conditioning (HVAC) systems to significantly cut emissions.
- **Renewable energy integration.** Installing rooftop solar panels and solar thermal systems to enable clean energy use on-site.
- **Efficient appliances and lighting.** Upgrading to high-efficiency appliances, LED lighting, and smart plugs to reduce electricity use in daily operations.
- **Building designs.** Deploying architectural solutions that maximise daylight and natural ventilation to reduce reliance on artificial lighting and cooling.

118 The sources of the data and information presented in this section include: IEA, 'Buildings', https://www.iea.org/energy-system/buildings; IEA, 'World Energy Outlook 2024', https://iea.blob.core.windows.net/assets/140a0470-5b90-4922-a0e9-838b3ac6918c/WorldEnergyOutlook2024.pdf; EEA, 'Annual European Union greenhouse gas inventory 1990-2023 and inventory document 2025', https://www.eea.europa.eu/en/analysis/publications/annual-european-union-greenhouse-gas-inventory-2025; European Commission, 'EU homes, key to the 2030 energy efficiency goals', https://build-up.ec.europa.eu/en/resources-and-tools/publications/eu-homes-key-2030-energy-efficiency-goals; European Commission, 'Energy Performance of Buildings Directive', https://energy.ec.europa.eu/topics/energy-efficiency/energy-performance-buildings/energy-performance-buildings-directive_en; BPIE, 'Italy Buildings Climate Tracker: Is Italy on track to decarbonise its building stock?', https://www.bpie.eu/publication/italy-buildings-climate-tracker-is-italy-on-track-to-decarbonise-its-building-stock/; IEA, 'World Energy Outlook 2025', https://www.iea.org/reports/world-energy-outlook-2025; European Environment Agency, 'Building renovation: where circular economy and climate meet', https://www.eea.europa.eu/publications/building-renovation-where-circular-economy.

119 Under the Energy Performance of Buildings Directive, a building is defined energy inefficient if it does not meet the nationally defined minimum energy performance requirements or falls within the worst-performing segment of buildings in its category.

120 A zero-carbon-ready building is designed to be highly energy-efficient and to operate either with renewable energy or with energy systems expected to be fully decarbonised by 2050.

In addition, a new set of technologies is emerging to drive deeper and smarter energy savings.

- **Smart energy management.** Leveraging Home Energy Management (HEM) systems and Building Automation Systems (BAS) that use sensors, data analytics, and automation to monitor and control building operations such as HVAC, lighting, and appliances to optimise energy consumption.

Beyond technology, a strong and consistent policy framework is essential to enable large-scale renovation and energy efficiency improvements, and the **EU policy and regulatory landscape** is evolving to support the sector's transition:

- **Energy Performance of Buildings Directive (EPBD).** The revised Energy Performance of Buildings Directive implemented in 2024 mandates national targets to cut residential energy use by up to 16% by 2030, with 55% of reductions from worst-performing buildings. It also requires zero-emission standards for new buildings and phases out fossil boiler subsidies.
- **Renovation Wave Strategy.** The Renovation Wave Strategy, introduced under the European Green Deal, also plays a key role in accelerating building upgrades; further details are provided in the Commercial Real Estate section.

9.2 TARGET AND PROGRESS UPDATE

In 2025, the physical intensity of the Residential Real Estate portfolio improved by over 6% compared to the prior year, reaching 26.88 $kgCO_2e/m^2$. This improvement was primarily attributable to an increasing proportion of properties with higher energy performance ratings. Improvements have also been achieved through the Bank's offerings, which make energy efficiency more accessible for homeowners. These are complemented by practical guidance on retrofit solutions and applicable incentives.

The steady growth in energy-efficient assets indicates positive progress within the portfolio. Achieving the target, however, will depend on broader policy interventions, particularly the decarbonisation of the energy grid, which is critical to sustaining long-term emissions reductions in this sector.

9.3 INTESA SANPAOLO IMPLEMENTATION STRATEGY FOR RESIDENTIAL REAL ESTATE DECARBONISATION

Building on previous initiatives and in line with evolving regulations, 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.** To this end, the Bank offers green mortgages to promote the energy efficiency of residential properties. These products are dedicated to retail clients to finance the purchase or construction of high energy performance homes but also upgrades such as window replacement and solar panels installation. More specifically, 'Green Mutuo Domus' provides preferential-rate mortgages for buying or renovating homes that meet minimum energy standards. Progressively taking into consideration EU Taxonomy's criteria, the product considers factors such as energy consumption relative to the year of construction and the applicable climatic zone, helping customers improve their property's energy class.
- beyond financing, the Bank has developed **consulting support** to advise its customers on opportunities and risks related to the efficiency of their assets.

Intesa Sanpaolo is also actively contributing to European-level discussions on major sector's initiatives. In particular, the Bank:

- takes part in the **'Energy efficient Mortgages Action Plan' (EeMAP),** which promotes the creation of a standardised energy-efficient mortgage framework across Europe to encourage building renovations and the purchase of high-performance properties under favourable financial conditions;
- adopts the **'Energy Efficient Mortgage Label' (EEML)**, aimed at ensuring portfolio compliance with key regulations such as the EU Taxonomy, the Mortgage Credit Directive (MCD) and the Capital Requirements Regulation (CRR), or their international equivalents. As part of this initiative, Intesa Sanpaolo has reported aggregated quarterly data on both green and standard portfolios since 2021;
- has joined the **European Energy Efficiency Financing Coalition**, promoted by the European Commission, which aims to create a favourable market environment for investments in energy efficiency also taking into consideration the objectives of the Energy Performance of Buildings Directive.

FINANCING THE TRANSITION TO A SUSTAINABLE, GREEN AND CIRCULAR ECONOMY

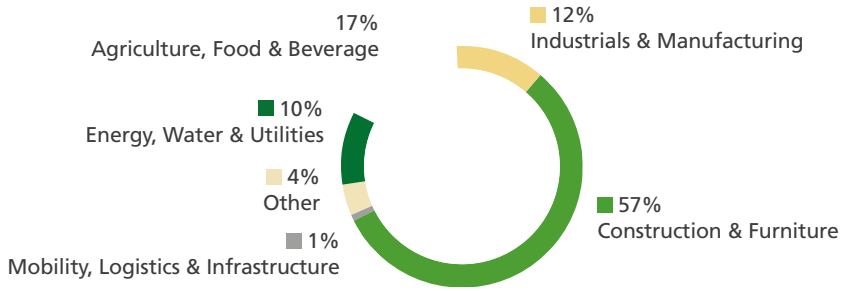
The Intesa Sanpaolo commitment to providing €76bn in the period 2021-2026 in new lending in order to support the green and circular economy and the ecological transition[121] has been achieved and exceeded over the 2022–2025 Business Plan period[122], with total disbursements reaching €89.4bn by end of 2025. Furthermore, Intesa Sanpaolo has renewed its support for the sustainable transition of its clients in the 2026-2029 Business Plan, committing to disbursing 30% of total medium to long-term (MLT) new lending[123] over the 2026-2029 Business Plan time horizon, with a strong focus on social and environmental activities.

Focus on the Circular Economy New Lending

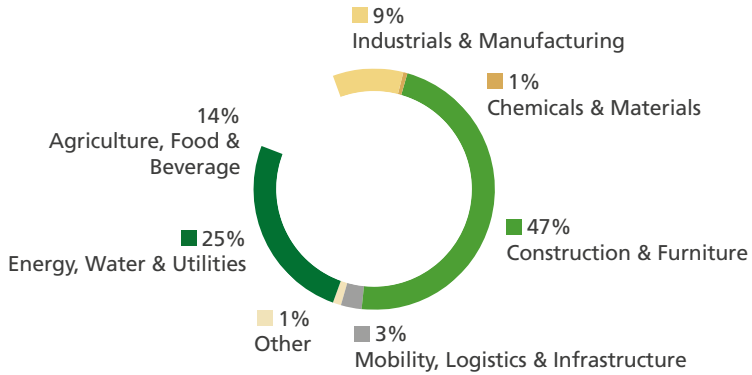
Within the 2022-2025 Business Plan, Intesa Sanpaolo achieved and exceeded its €8bn circular economy new lending[124] target, with total disbursements reaching €15.9bn by 2025, taking into account previously agreed projects (of which around €10.7bn related to green criteria). In 2025, the Group disbursed around €3.3bn, taking into account previously granted amounts (of which approximately €1.6bn related to green criteria).

Focus on projects related to Circular Economy dedicated credit facility (% amounts disbursed by sector*)

2025



2024



* The sum of the chart components does not equal 100% due to rounding adjustments.

121 Including Mission 2 of the National Recovery and Resilience Plan (NRRP).
122 2021-2025. Starting from 30.06.2024 the figure also includes the 2022-2025 cumulative amount of transition finance pertaining to the foreign activities of the Group.
123 Equal to ~€112bn assuming ~€374bn total MLT new lending, of which ~€87bn environmental, governance and other sustainable activities.
124 Including circular and green criteria.

Focus on S-Loans

Disbursed in 2023

Disbursed in 2024

~€4.3bn Disbursed in 2025

~€11.1bn Disbursed from July 2020

Focus on Green Mortgages[125]

~€6.3bn Disbursed in 2025

~€15.2bn Disbursed in 2022-2025

✓ New green lending to individuals: €12bn by 2025, in line with 2022-2025 Business Plan horizon

125 Starting from 30.06.24 the cumulative amount of green mortgages issued by the International Banks Division since 2023 is also included.

GREEN BONDS AND USE OF PROCEEDS

In 2017, Intesa Sanpaolo was the first Italian Bank to issue a €500mln Green Bond connected with environmental sustainability projects. Since 2017 Intesa Sanpaolo has issued more than €10bn in Green Bonds (€8.67bn outstanding as of 31.12.2025).

Green Bonds Outstanding[126]

	Focused on Green Mortgages	All Green categories of the Green, Social and Sustainability Bond Framework						
Amount	€1.25bn	€1bn	€750mln	€1.5bn	£600mln	Dual Tranche €1bn – 3y €1.25bn – 7y	¥37.1bn Triple Tranche ¥35bn – 2y ¥1.9bn – 3y ¥200mln – 7y	€1bn
Underwriting	>50% from ESG investors	75% from ESG investors (54% Dark Green & 21% Light Green)	~80% from ESG investors	~80% from ESG investors	~88% from ESG investors	83% from ESG investors	N/A	>85% from ESG investors
Value date	March 2021	September 2022	March 2023	March 2023	March 2023	May 2023	March 2024	April 2024
Maturity date	March 2028	September 2027	March 2033	March 2028 (Callable March 2027)	March 2029 (callable March 2028)	May 2026/2030	March 2026/2027/2031	October 2030
Alignment	2018 GBPs, 2020 SBPs and SBGs 2018	2021						
Second Party	ISS ESG							

126 Wholesale Public Issues.

The new 2025 Green and Social Bond Report covering the Green Bonds outstanding as of 31.12.2025 will be published in 2026. The report is based on the 'Portfolio approach' which, rather than reporting on the allocation of the proceeds and the environmental benefits of each loan, through to the coverage of the complete amount of the bond, estimates the impacts and benefits obtained for the entire portfolio of eligible loans for each of the green categories. In addition, by looking at the estimated average impact per million euro financed, it is possible to calculate the tonnes of CO_2 avoided directly attributable to the bond purchased. As shared in the report, the proceeds of any Intesa Sanpaolo Green Bond issued under the framework have been allocated exclusively to Eligible Loans.

ISP GREEN LOAN PORTFOLIO

Eligible categories	# of loans	Outstanding Amount (€)	Tenor (years)	% Outside Italy
Renewable Energy	**742**	**1,998,066,466**	**5.6**	**45%**
Photovoltaic	645	1,640,362,941	5.5	47%
Eolic	48	296,800,728	6.2	44%
Hydroelectric	49	60,902,797	6.8	0%
Energy efficiency	**31**	**82,106,041**	**3.8**	**0%**
Green buildings	**140,405**	**16,998,551,799**	**23.5**	**11%**
Built after 01.01.2021				
NZEB - 10%[130]	24,784	4,017,014,257	25.4	4%
Built before 31.12.2020				
EPC Label A	68,974	7,799,222,367	22.8	21%
Other in Top 15%[131]	46,647	5,182,315,175	23.0	2%
Circular Economy	**66**	**1,675,193,455**	**3.2**	**2%**
Total		**20,753,917,761**	**20.2**	**14%**

ISP GREEN FUNDING

ISIN	Allocated Amount (€)
XS2529233814	1,000 mln
XS2450068619[127]	18 mln
XS2317069685	1,250 mln
XS2592650373	1,500 mln
XS2592658947	750 mln
XS2598063480[128]	673 mln
XS2625195891	1,000 mln
XS2625196352	1,250 mln
XS2783774743[129]	1 mln
XS2783773778[129]	12 mln
XS2783772614[129]	216 mln
XS2804485915	1,000 mln
	8,670 mln

When considering the use of proceeds and their effects on GHG emission reduction, 81.9% of the proceeds have been allocated to loans for Green Buildings, 9.6% for Renewable Energy, 8.1% for Circular economy projects and 0.4% for Energy efficiency measures.

IMPACT REPORTING AT GREEN PORTFOLIO LEVEL

Eligible Loan Category	# of loans	Outstanding Amount* € mln	Share of total portfolio financing	Avoided financed GHG emissions (tCO_2e)[132]
Renewable Energy	742	1,998	9.6%	3,297,000
Energy efficiency	31	82	0.4%	51,000
Green Buildings	140,405	16,999	81.9%	427,500
Circular Economy	66	1,675	8.1%	1,060,000
Total	**141,244**	**20,754**	**100%**	**4,835,500**
Estimated Impact per €1mln invested (GHG)				229

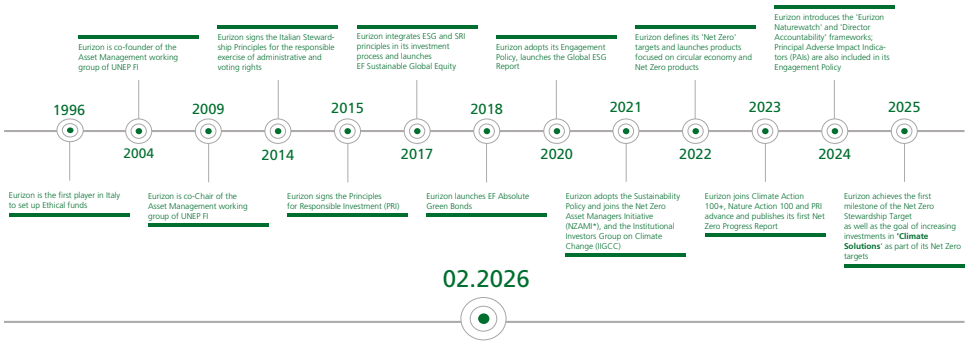
* As of 31st December 2025.

Avoided financed GHG emissions amount to 4.8mln tCO_2e and estimated Impact per €1mln invested is equal to 229 tCO_2e of avoided GHG emissions. The avoided emissions have been calculated, adopting a conservative approach, in compliance with the Global GHG Accounting and Reporting Standard for the Financial Industry and the Life Cycle Assessment approach and they have been proportionally allocated according to an Attribution Factor.

127 Private Placement ¥2.4 bn printed in 2022.
128 Public Issue GBP 600 mln printed in March 2023.
129 JPY triple tranche printed in March 2024.
130 Italy doesn't specify a numerical indicator of primary energy requirement for Nearly-Zero Energy Buildings (NZEB) in the transposition of the EU Energy Performance of Buildings Directive 2010/31/EU (EPBD). Therefore, Buildings considered with Primary Energy Demand at least 10% lower than the threshold set for NZEB requirements in national measures are those that meet Primary Energy Demand thresholds by climate area defined by third-party provider analysis.
131 Buildings belonging to the Top 15% of the national residential building stock according to Primary Energy Demand thresholds by climate area defined by third-party provider analysis.
132 Avoided emissions only refer to outstanding eligible loans of the Portfolio.

EURIZON ESG & CLIMATE COMMITMENT AND ESG REPORTS

In light of its fiduciary duty to clients, investors and stakeholders, Eurizon attributes great importance to sustainability, including climate related issues.



At the relaunch of NZAMI, **Eurizon confirmes the membership** to the initiative and it is currently updating its previous target disclosure**

* On 13 January 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context. During this review phase, the initiative suspended activities to track signatory implementation and reporting. On 29 October 2025, the review was completed with the relaunch of the initiative and the adoption of an updated framework that introduces greater flexibility in the definition of targets, while maintaining the commitment to transparency and annual reporting.
** Please refer to the NZAMI website, where the revised targets will be published.

EURIZON NET ZERO TARGETS

Eurizon has defined Net Zero targets across different areas of action. In setting these targets, Eurizon has followed the 'Net Zero Investment Framework 1.5°C' ('NZIF'), considering Scope 1 and Scope 2 emissions for investee companies, with the intention of incorporating Scope 3 emissions when data availability will improve.

The table below presents progress on Net Zero targets as of year-end 2025. For further details, please refer to Eurizon Net Zero Progress Report 2025. The 'Portfolio Level Reference' and 'Stewardship & Engagement' Targets below are related to the so called '**Portfolio in Scope'**, consisting of investments in Listed Equity and Corporate Fixed Income and **amounting to €67.5bn**, equivalent to **15.39%** of its AUM as of 31 December 2021, while the 'Climate Solutions' Target is related to Eurizon Capital's total Assets Under Management.

EURIZON ASSET MANAGEMENT

Annual Reporting on Target progress

Targets

Portfolio Level Reference

- Calculated as the **Weighted Average Carbon Intensity (WACI)** of investee companies expressed as **tCO_2e/mln$ Revenue**
- Aim is to reduce the **WACI of Portfolio in Scope by 50%** by 2030 vs Baseline year

Target	Baseline	Last
2030	2019	Dec 2025
-50%	166.47 tCO_2e/mln $	102.67 tCO_2e/mln $ (-38.33%)

Stewardship & Engagement

- **# of Net Zero-focused engagements** (i.e., number of companies to be engaged **covering 70% and 90% of financed emissions by 2025 and 2030** respectively of the Portfolio in Scope)

Target	Baseline	Last
2025	2019	Dec 2025
70%	0%	75.57% ✓
LT Target		
2030		
90%		

- Eurizon has the objective to dialogue with **155 companies by 2030** to encourage them to achieve progressively a better degree of alignment to Net Zero Scenario

155	0	83

Climate Solutions

- **% of AuM in scope** invested **in Green Bonds**

Target[133]	Baseline	Last
2025	2019	Dec 2025
4%	1.53%	4.02% ✓

Insights

PORTFOLIO LEVEL REFERENCE

- Eurizon announced its goal of halving WACI of Portfolio in Scope by 2030 compared to the baseline year (2019), as required by the IPCC (Intergovernmental Panel on Climate Change), through actions that include stewardship & engagement activities and investments in climate solutions.

STEWARDSHIP TARGET

- Eurizon has defined an **analysis framework** for assessing the credibility of **issuers' transition plans.**

CLIMATE SOLUTIONS

- Starting from December 2023, the figure considers the amounts invested both in **Green Bonds and Sustainability Bonds.**

133 Following the achievement of the Climate Solutions target set for the end of 2025 and taking into account the market growth forecasts for GSS+ bonds developed by the Climate Bonds Initiative (CBI), Eurizon has updated its target by committing to reach, by the end of 2030, a share of investments in Green and Sustainability Bonds equal to approximately 8% of total bond investments, starting from a baseline of roughly 6.5% in 2025.

Going forward, the following metric, which has been externally reported until 31.12.2025, will be monitored for internal purposes only in light of the revised strategic priorities set out in the new NZAMI Commitment Statement:

- **Asset Level Alignment**: % 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').

EURIZON STEWARDSHIP PRIORITY ISSUES

Eurizon periodically identifies priority issues on which it intends to focus its stewardship activities. During 2025, the environmental topics identified by the Company were:

- **climate change mitigation and adaptation**, with particular focus on the credibility of issuers' Transition Plans and on Directors' accountability in the implementation of decarbonisation strategies. Analysis of the degree of alignment of a company's strategy with the Net Zero scenario are carried out using the NZIF methodology promoted by IIGCC[134]. As part of its stewardship activities, Eurizon commits to vote 'Say on Climate' proposals on climate transition strategies presented by the management of investee companies at Annual General Meetings;
- **biodiversity loss mitigation**, through monitoring the impact of companies' activities on the ecosystem.

In particular, within its Engagement Policy, Eurizon has defined the guidelines supporting the dialogue with issuers to address biodiversity loss and deforestation by promoting:

i. transparency in the sourcing and use of raw materials,
ii. the adoption of circular economy and material recycling practices and
iii. an ongoing commitment to more sustainable standards, also at a supply chain level.

During 2025, Eurizon conducted 763 engagements, ~35% of which concerned sustainability-related matters; 36 companies were engaged regarding their Net Zero Strategy.

Eurizon Capital SGR expressed its vote on 14 'Say on Climate' resolutions[135] , supported 100% (5) of the shareholder proposals requesting the presentation of the transition plan to the vote, engaged with 18 issuers active in the fossil fuel sector to ensure the phase-out of existing activities and no new investments in thermal coal generation or oil sands extraction and supported 48 resolutions asking companies to provide adequate disclosure that would allow for the evaluations of the current management of risks related to climate change. It also supported 100% of the proposals (18) requesting greater transparency in biodiversity conservation and circular economy[136].

134 The 'Net Zero Investment Framework' (NZIF) methodology promoted by IIGCC, takes into account six criteria:
- 'Ambition': the presence of public declarations of intent to reach the target of net zero direct and indirect emissions no later than 2050;
- 'Targets': the publication of short- and medium-term targets to reduce own emissions;
- 'Emission Performance': the publication of direct and indirect emission reduction levels in relation to established targets;
- 'Transparency': the publication of own emission levels;
- 'Decarbonisation strategy': the adoption of a strategy to achieve the decarbonisation targets;
- 'Capital Allocation': the consistency expenditure with the target or reaching a 'Net Zero' scenario.

135 At the Asset Management Division level, Eurizon expressed its vote on 21 'Say on Climate' proposals, considering Eurizon Capital SGR – Luxembourg Branch.

136 In particular, Eurizon Capital SGR expressed its vote on 14 'Say on Climate' resolutions and supported 36 resolutions asking companies to provide adequate disclosure that would allow for the evaluations of the actual management of risks related to climate change; it also supported 100% of the proposals (22) requesting greater transparency in biodiversity conservation and circular economy.

EURIZON ENGAGEMENT ACTIVITIES REGARDING NET ZERO

Eurizon has joined the following international initiatives:

- the 'Climate Action 100+', a collaborative investor initiative to ensure the world's largest corporate greenhouse gas emitters to act on climate change;
- the 'Nature Action 100', a global investor-led engagement initiative focused on supporting greater corporate ambition and action to reverse nature and biodiversity loss;
- the 'Net Zero Engagement Initiative' (NZEI), a platform that aims to accelerate and support the engagement processes and enable investors to achieve the engagement goals, set as part of their Net Zero commitment;
- the 'CDP Non-Disclosure Campaign', that leverages the power of direct engagement from financial institutions to drive corporate environmental disclosure on climate, water and forest management.

Furthermore, among others, Eurizon is part of the following international working groups with the aim of further innovating and contributing to the development of methodologies and tools that could help to achieve Net Zero:

- IIGCC Bondholder Stewardship Working Group aimed at developing guidelines for Fixed Income investor engagement;
- IIGCC Proxy Advisor Engagement Working Group aimed at involving Proxy Advisors in the definition of guidelines dedicated to the evaluation of climate governance best practices;
- IGCC Sovereign Bond and Country pathways aimed at defining guidelines for the evaluation of paths and progress of Countries in reaching Net Zero by 2050;
- IIGCC Index Investing Working Group, to develop supplementary guidance to the Net Zero Investment Framework for Passive Investing, to globally promote and develop passive capital towards the Net Zero transition;
- PRI Listed Equity Working Group aimed at identifying best valuation methodologies for equity investments in listed companies;
- PRI Circular Economy Reference Group, with the aim of sensitising investors on the risks and opportunities associated with the transition to a circular economy.

In 2025, Eurizon supported the statement 'A demanding climate plan to ensure economic resilience' promoted by the French Forum for Responsible Investment (Forum pour l'Investissement Responsible, FIR).

This initiative involves the collaboration of more than 40 major institutional investors, representing a combined total of over €2.4 trillion in assets under management. Its primary objective is to encourage companies to move from mere environmental promises to concrete, measurable, and transparent transition plans.

In addition, in 2025 Eurizon continued to apply its two frameworks:

- Eurizon's framework to assess 'Directors' accountability to Climate Change' which looks at good corporate governance practices to support the decarbonisation process of issuers;
- 'Eurizon NatureWatch' framework which is used to prioritise engagement actions towards companies whose sites or operations are located in or close to biodiversity-sensitive areas and have negative impacts on these areas.

Finally, 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.

EURIZON ESG REPORTS

Eurizon, in its 'Global ESG Report', discloses information on certain ESG metrics of its sustainability-aware products and describes their alignment with the United Nations' 17 Sustainable Development Goals (SDGs). In the 'Green Bonds Impact Report', Eurizon describes the impacts generated by investments in green bonds through its dedicated funds, as well as their alignment with the United Nation's SDGs. For further information on the 'Global ESG Report' and the 'Green Bonds Impact Report', please refer to Eurizon's website.

With regard to sustainable funds, in 2018 Eurizon became the first Italian asset management company to establish a green bond fund (Eurizon Fund - Absolute Green Bonds) through Eurizon Capital S.A.[137]. Assets managed by the Fund amounted 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 investments made by Eurizon Fund - Absolute Green Bonds and Eurizon Fund - Green Euro Credit have contributed to important environmental and social 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.

137 Eurizon Capital S.A. has been merged by incorporation into Eurizon Capital SGR S.p.A., which operates in Luxembourg through the new branch Eurizon Capital SGR S.p.A. – Luxembourg Branch, effective 1 December 2025.

FIDEURAM ESG & CLIMATE COMMITMENT

NET ZERO JOURNEY

10/21	Fideuram Asset Management SGR (FAM)* and Fideuram Asset Management Ireland (FAMI) joined the NZAMI**
04/22	FAM and FAMI joined the Institutional Investor Group on Climate Change (IIGCC)
10/22	FAM and FAMI published their initial Net Zero targets in line with NZAMI Commitment
05/23	FAM and FAMI joined the Net Zero Engagement Initiative promoted by IIGCC
05/23	Creation of FoF and ETF working group launched by IIGCC and requested by FAM and FAMI
09/23	First Annual NZAMI disclosure through UN PRI Platform
10/23	Admission as contributors to the initiative CA100+ working Groups
02/24	FAM and FAMI joined Sovereign Bond and Country Pathways working group launched by IIGCC 02/2024
04/24	FAM and FAMI co-signed for the first time the **Non-Disclosure Campaign** launched by **CDP**
10/24	FAM and FAMI signed the Global Investor Statement to Governments on the Climate Crisis sponsored by the Investors Agenda 10/2024
01/25	FAM and FAMI started working with **NZAMI's** network partners to review the alliance, throughout the activities planned for the **Consultation Phase**
02/26	At the relaunch of NZAMI, **FAMI confirmed the membership** to the initiative and it is currently updating its previous target disclosure***, while the membership of FAM ceased due to the end of its business activities

* On July 1st, 2025, the full demerger of Fideuram Asset Management SGR in favor of Fideuram - Intesa Sanpaolo Private Banking and Eurizon Capital SGR becomes effective, resulting in the cessation of its business activities.

** On 13 January 2025, NZAMI launched a review of the initiative to ensure it remains fit for purpose in the new global context. During this review phase, the initiative suspended activities to track signatory implementation and reporting. On 29 October 2025, the review was completed with the relaunch of the initiative and the adoption of an updated framework that introduces greater flexibility in the definition of targets, while maintaining the commitment to transparency and annual reporting.

*** Please refer to the NZAMI website, where the revised targets will be published.

FIDEURAM INVESTMENT PRODUCTS

As of 31.12.2025, Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland have 353 products classified as art. 8 and 9 of the SFDR Regulation, for a total of €93bn of which: €47bn of investment funds, €38bn of individual portfolio mandates and the remaining part are insurance and pension products.

Fideuram Asset Management Ireland manages 167 investment funds, of which 98 classified pursuant to Art. 8 and 5 classified pursuant to Art. 9 of the SFDR Regulation, representing about 89% of the total assets of the funds managed on 31 December 2025 (vs 84% in 2024).

FIDEURAM NET ZERO TARGETS

In 2022, Fideuram Asset Management SGR[138] and Fideuram Asset Management Ireland disclosed their net zero commitments, outlining objectives across different areas of action, in line with the principles and guidance of the Net Zero Investment Framework (NZIF).

The following table provides the ongoing targets and progress for Fideuram Asset Management Ireland. The metrics reported have been calculated using holdings 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. Progress versus targets is represented up to 30.06.2025, except for the Stewardship & Engagement target, which reflects engagement activities carried out through the end of 2025.

138 On July 1st, 2025, the full demerger of Fideuram 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.

FIDEURAM ASSET MANAGEMENT IRELAND

Annual Reporting on Target progress

Targets

Portfolio Level Reference

- Calculation of emissions **'Intensity Based' for material sectors[139] and high impact companies[140] of the portfolio in scope,** using the most updated GHG data **(tCO_2/mln€ EVIC)**

Target	Baseline	Last
2030	2021	2025
-50%	83.10 tCO_2e/mln € EVIC	51.08* tCO_2e/mln € EVIC (-38.53%)

Stewardship & Engagement

- % of Coverage in terms of financed emissions in material sectors or higher impact companies of issuers classified in the buckets Achieving Net Zero, Aligned to a Net Zero Pathway or under stewardship and engagement activities

Target	Baseline	Last
2025	2021	2025
70%	2.37%	72.11% ✓
LT Target		
2030		
90%		

Climate Solutions

- **% of AuM in scope** invested **in Green Bonds (out of total AuM of committed products)**

Target	Baseline	Last
2025	2021	2025
X3	1.31%	4.26%* ✓

Insights

PORTFOLIO LEVEL REFERENCE

- The carbon footprint is calculated on the holdings with availability of company carbon emissions and EVIC €
- During 2025, the carbon footprint metrics (emissions scope 1 and scope 2) of the portfolio in scope is 51.08 tCO_2e/€ million invested

STEWARDSHIP & ENGAGEMENT

- The data reported are calculated on the holdings with availability of company carbon emissions and EVIC €
- During 2025, Fideuram Asset Management Ireland achieved the coverage of financed emissions of 72.11%
- Fideuram Asset Management Ireland broadened the coverage of financed emissions by joining collective initiatives, (e.g., Climate Action 100+ and Net Zero Engagement Initiative) and also through bilateral activities on the main contributors to portfolios financed emissions

CLIMATE SOLUTIONS

- The percentage of investments in climate solutions is 4.26% of total AuM of committed products (€27.1bn)

Baseline: portfolio holdings as of December 2021 and carbon emissions as of 2019.
* Progress versus target is represented up to 30.06.2025.

139 Material sectors are identified with NACE code categories A-H and J-L.
140 Higher Impact Companies are defined as: CA100+ focus list, companies in high sectors consistent with Transition Pathway Initiative sectors, plus banks and real estate.

Despite the cessation of the business activities of Fideuram Asset Management SGR[141], the Company met its 2025 targets related to Stewardship & Engagement and to Climate Solutions, achieving respectively a coverage of financed emissions of 71.25% (against a target of 70%) and climate solutions investments of 1.25% (above the target to triple the baseline level of 0.34%).

The Portfolio in scope (also 'AUM in scope') is defined considering a subset of managed financial products and, in terms of asset classes, corporate bonds and listed equities. The relevant AUM in scope for Fideuram Asset Management SGR and Fideuram Asset Management Ireland is respectively **€11.18bn (16.14%)** and **€16.76bn**[142] **(33.86%)** at 30.06.2025.

In light of the methodological updates and the revised strategic priorities set out in the new NZAMI Commitment Statement, the following metric, monitored up to 2025, will be removed from the scope of external reporting as of FY 2026:

- **Portfolio Coverage:** % of AuM in scope invested in assets in material sectors[143] and higher impact companies[144] that are Achieving Net Zero, Aligned to a Net Zero Pathway or Aligning Towards a Net Zero Pathway. At the end of June of 2025, the percentages of issuers classified into the buckets Achieving Net Zero, Aligned to a Net Zero Pathway or Aligning Towards a Net Zero Pathway are respectively 20.08% (€2.15bn of AUM out of €10.73bn) and 18.90% (€3.01bn of AUM out of €15.93bn) for Fideuram Asset Management SGR and Fideuram Asset Management Ireland.

Nevertheless, Fideuram Asset Management Ireland will continue to maintain oversight of these metrics through its internal monitoring activities.

FIDEURAM ENGAGEMENT ACTIVITIES AND NET ZERO UPDATES

In terms of general engagement activities, in 2025, Fideuram Asset Management SGR[145] (until the 30.06.2025) and Fideuram Asset Management Ireland conducted 83 and 40 engagements respectively, of which 70 and 40 concerned ESG matters (84% and 100%).

Regarding Net Zero, in 2025 the two entities conducted dedicated engagement and stewardship activities that allowed them to achieve 71.25% and 72.11% in terms of financed emissions coverage respectively[146]. The potential target companies have been prioritised considering several factors, such as the current level of carbon emissions, the estimated future level of carbon emissions, the geographical presence and the progress to date with respect to their decarbonisation targets.

Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland conducted individual and collective engagement activities, joining collective initiatives[147] such as Climate Action 100+ and the Net Zero Engagement Initiative set up by IIGCC[148]. Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland also co-signed the '2025 Non-Disclosure Campaign launched by CDP'.

Regarding indirect investments, Fideuram - Intesa Sanpaolo Private Banking and Fideuram Asset Management Ireland promoted and joined a working group within IIGCC, with the aim of developing a framework to assess Net Zero alignment for External Funds Managers and investments in third parties' funds based on consistent, solid and accepted criteria.

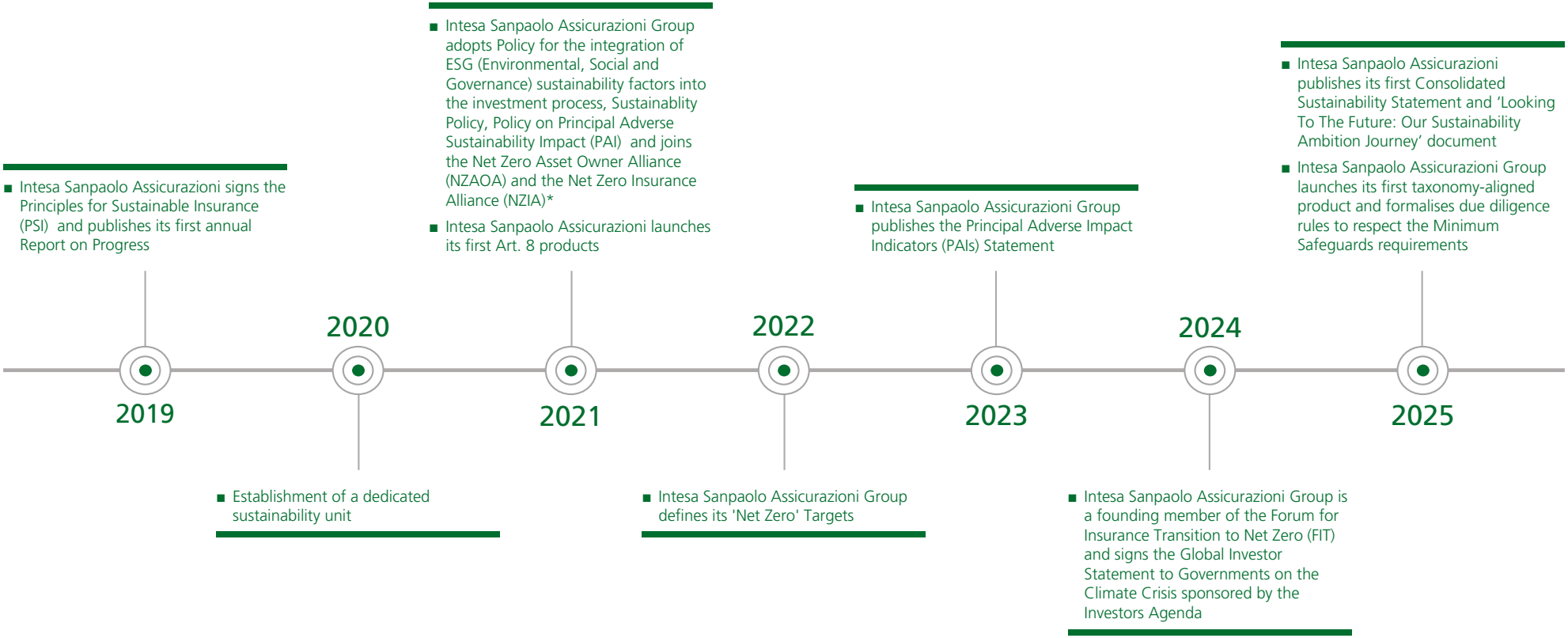
Fideuram Asset Management SGR and Fideuram Asset Management Ireland signed the Global Investor Statement to Governments on the Climate Crisis sponsored by the Investors Agenda in October 2024. The document represents the most comprehensive statement to date, calling on governments to strengthen their climate policies and limit the rise in temperatures to within 1.5°C.

A dedicated structure, namely 'ESG & Strategic Activism', which reports to the Head of Investment Center ensures the proper management of ESG matters within the Private Banking Division. Specifically, regarding voting activities, the structure collaborates with the relevant internal functions for the exercise of administrative and voting rights, in particular on proposals regarding sustainability to be approved during shareholders' meetings. Voting instructions are based on the analysis of public documents, the results of interaction with the issuing company ('engagement') and Proxy Advisor indications. Fideuram[149], in exercising the rights of intervention and vote at the Shareholders' Meetings, places particular attention to the strategies to combat climate change proposed by issuers.

141 On July 1st, 2025, the full demerger of Fideuram 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.
142 At the end of 2021 the value of Fideuram Asset Management Ireland's Portfolio in scope is equal to €13.1bn.
143 Material sectors are identified with NACE code categories A-H and J-L.
144 Higher Impact Companies are defined as: CA100+ focus list, companies in high sectors consistent with Transition Pathway Initiative sectors, plus banks and real estate.
145 On July 1st, 2025, the full demerger of Fideuram 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.
146 The values refer to stewardship and engagement activities on companies realised through individual activities or by collective initiatives.
147 Fideuram - Intesa Sanpaolo Private Banking S.p.A and Fideuram Asset Management Ireland are currently part of 2 working groups established by CA100+ and 6 working groups of the Net Zero Engagement Initiative.
148 Institutional Investors' Group on Climate Change.
149 Voting activities were carried out by Fideuram Asset Management Ireland and Fideuram Asset Management SGR until the 30.06.2025 and only by Fideuram Asset Management Ireland thereafter.

INTESA SANPAOLO ASSICURAZIONI NET ZERO COMMITMENT

The Intesa Sanpaolo Assicurazioni Group has continued over the years its development path on climate-related issues, implementing concrete actions and initiatives aimed at further strengthening internal governance while also generating a tangible and significant impact on its customers[150].



* The Net-Zero Insurance Alliance was discontinued as of 25 April 2024. Following this, the United Nations Environment Programme Finance Initiative (UNEP FI) announced the Forum for Insurance Transition to Net-Zero, aimed at supporting the necessary acceleration and scaling-up of voluntary climate action by the insurance industry and key stakeholders.

150 For further details please refer to the Consolidated Sustainability Statement of Intesa Sanpaolo Assicurazioni Group, within the Management Report of the Intesa Sanpaolo Assicurazioni Group's Consolidated Financial Statements.

INTESA SANPAOLO ASSICURAZIONI ENGAGEMENT ACTIVITIES REGARDING NET ZERO

The Intesa Sanpaolo Assicurazioni Group promotes proactive interaction with the issuer companies both through the exercise of intervention and voting rights, including through Delegated Managers, and through discussions with the investee companies, encouraging effective communication with the management of the companies (so-called 'active ownership - engagement'). At the same time, the Intesa Sanpaolo Assicurazioni Group is committed to engaging with Oil & Gas companies and third-party managers to promote a sustainable transition, encouraging companies to set science-based emission reduction targets, publish detailed transition plans, align business strategy and investments with decarbonisation targets, address fugitive methane emissions, avoid dependence on carbon-intensive unconventional Oil & Gas, and refrain from new investments in drilling in sensitive areas such as the Arctic.

The Group, also through the Delegated Asset Manager, promotes engagement with issuers that are less advanced in terms of climate action and in sectors with the greatest environmental impact. Climate change mitigation and adaptation have been identified as priority topics for stewardship activities with investee companies.

Intesa Sanpaolo Assicurazioni signed the Global Investor Statement to Governments on the Climate Crisis sponsored by the Investors Agenda in October 2024. The document represents the most comprehensive statement to date, calling on governments to strengthen their climate policies and limit the rise in temperatures to within 1.5°C.

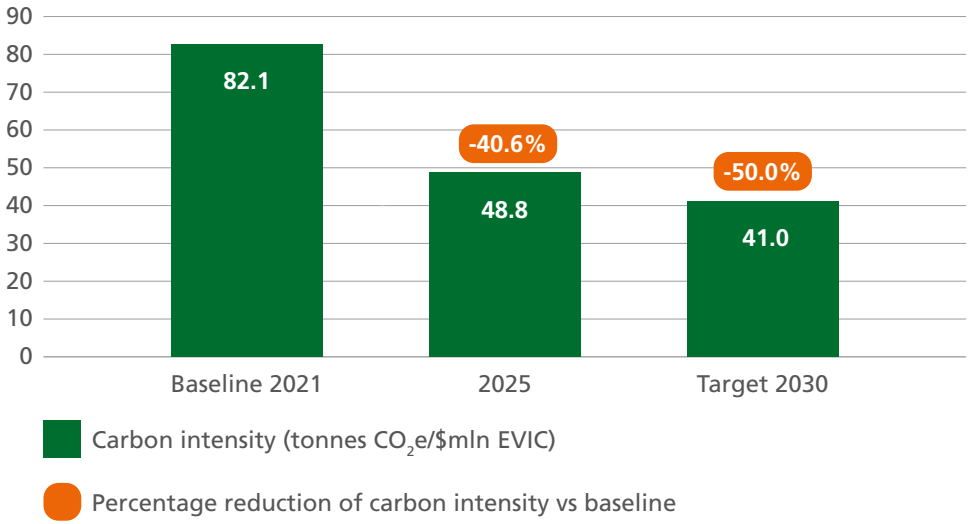
151 The carbon intensity, calculated annually, is expressed as the weighted average of the ratio: tonnes CO_2e/$mln EVIC ('Enterprise Value Including Cash' of each issuer analysed) which measures the tonnes of CO_2 equivalent per million EVIC.

INTESA SANPAOLO ASSICURAZIONI TARGETS

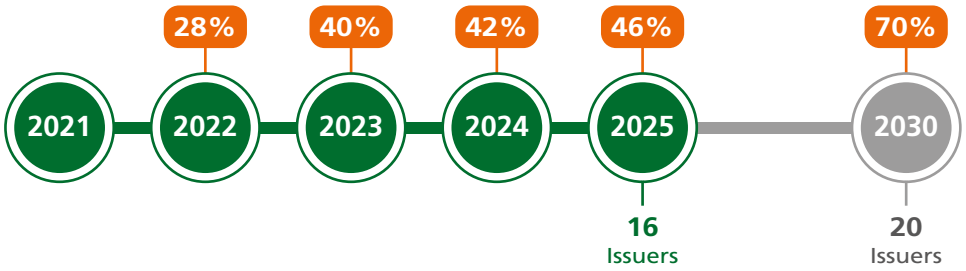
In October 2022, the Intesa Sanpaolo Assicurazioni Group published its first intermediate climate targets for the investment portfolio for 2030. In particular, as part of the mitigation of the its investment portfolio's emissions, the Intesa Sanpaolo Assicurazioni Group, in line with the indications 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), committed to:

Quantitative sub-portfolio targets	Cutting the emissions of 'Direct Investments' - for the Listed Equity and Publicly Traded Corporate Bond asset classes - by 50% by 2030 in terms of carbon intensity by Enterprise Value Including Cash (EVIC)[151], considering 2021 as the baseline year. As of 31 December 2021, €19.6bn of Assets Under Management were covered by the target.
Engagement targets	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 aim of evaluating, discussing and enabling their respective decarbonisation pathways and strategies. The Group will also cooperate with the NZAOA by sharing input for collaborative position papers on related topics.

During 2025 the company has quarterly monitored the targets' progress and activated new engagement strategies in order to progress towards its 2030 goals. The prospect below shows positive progress.



The result achieved as at 31.12.2025, within the decarbonisation process based on carbon intensity by EVIC, is equal to 48.8 tonnes CO_2e/$mln EVIC, recording a reduction of 40.6% compared to the 2021 baseline value equal to 82.1 tonnes CO_2e/$mln EVIC.



The Intesa Sanpaolo Assicurazioni Group, as part of the Engagement objective, has reached a total of 16 issuers representing 46% of the portfolio emissions in the perimeter, through engagement actions.

INTESA SANPAOLO ASSICURAZIONI'S ACTIVITIES REGARDING CLIMATE INITIATIVE

To promote sustainability culture and contribute to the development of methodologies and tools to support the transition, Intesa Sanpaolo Assicurazioni Group is part of the following international working groups:

- 'Sovereign Debt' working group, which is using the ASCOR database to develop a scorecard for monitoring countries' progress towards decarbonisation. 'Assessing Sovereign Climate-related Opportunities and Risks' (ASCOR) is an investor-led initiative aiming to create a free, independent database to evaluate countries' climate change performance. The Insurance Group's involvement has supported the development of tools to help investors better understand and manage sovereign climate risks and opportunities;
- NZAOA Reporting working group, where the Intesa Sanpaolo Assicurazioni Group acts as a leader. Under its guidance, the working group focused on developing the technical components of the reporting template and streamlining the reporting process for members. These efforts have enhanced the Alliance's reporting framework, enabling members to better track and communicate their progress toward net-zero targets;
- NZAOA working group on transition finance in high-emitting sectors, contributing to the broadening of the concept of sector targets by placing them within a wider transition finance framework. The work focuses on defining rigorous and credible criteria to assess the robustness of corporate transition plans, particularly in the most emission-intensive sectors;
- 'Forum for Insurance Transition to Net Zero (FIT)'[152], as a founding member. Established by UNEP in April 2024, the Forum aims to accelerate and enhance voluntary climate action by the insurance industry and other key stakeholders;
- 'Transition Plan' working group, part of the Forum for Insurance Transition to Net Zero, contributing to the development of the first global guidance on transition plans for insurance companies. This initiative led to the drafting of three documents on transition plans for insurance companies, which together constitute the most comprehensive roadmap currently available for credible and specific transition planning for the insurance sector: 'Closing the Gap: The emerging global agenda of transition plans and the need for insurance-specific guidance',

152 The Forum was announced by the United Nations Environment Programme (UNEP FI) following the announcement of the termination of the Net-Zero Insurance Alliance on April 25, 2024.

'Underwriting the Transition: A deep-dive transition plan guide for insurance and reinsurance underwriting portfolios' and 'A Total Balance Sheet Transition: A holistic transition plan guide linking the underwriting and investment portfolios of insurers and reinsurers'.

Finally, in 2025, in relation to FY 2024, Intesa Sanpaolo Assicurazioni published for the first time 'Looking to the Future: Our Sustainability Ambition Journey', a document that sets out the Group's long-term vision and outlines the strategies and actions supporting the transition to a sustainable economy. The Group also released its first Consolidated Sustainability Statement, detailing commitments, initiatives and targets across the key dimensions of sustainability.

AUDITORS' REPORT

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Intesa Sanpaolo S.p.A.

Independent Auditors' report on the disclosures "Own operations indicators" and "Target setting on lending activities: annual reporting of estimated emissions" reported in the section "Metrics & Targets" of the Climate Report of the Intesa Sanpaolo Group for the year ended 31 December 2025

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Independent Auditors' report on the disclosures "Own operations indicators" and "Target setting on lending activities: annual reporting of estimated emissions" reported in the section "Metrics & Targets" of the Climate Report of the Intesa Sanpaolo Group for the year ended 31 December 2025

To the Board of Directors of Intesa Sanpaolo S.p.A.

We were engaged to perform a limited assurance engagement 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 & Targets" of the Climate Report of the Intesa Sanpaolo Group for the year ended 31 December 2025 (the "2025 Climate Report"), approved by the Board of Directors of Intesa Sanpaolo S.p.A. (the "Bank") on 26 March 2026.

The Subject Matter has been prepared to disclose annual reporting of emissions against targets. The Subject Matter has been prepared in accordance with the criteria defined in the following sections of the 2025 Climate Report:

- "Methodology: Own Emissions" prepared taking into account the "GHG Protocol Corporate Standard";
- "Methodology: Target Setting on Lending Activities" prepared taking into account the "Guidelines for Climate Target Setting for Banks" issued by the United Nations Environment Programme Finance Initiative ("UNEP FI") in April 2021 and the "Financial Sector Science-Based Targets Guidance – version 1.2" issued by Science Based Target initiative ("SBTi") in September 2024;

(comprehensively the "Suitable Criteria").

Management's responsibility

Management is responsible for the preparation of the 2025 Climate Report in accordance with the criteria described in the Task Force on Climate-related Financial Disclosures issued by the Financial Stability Board. The Subject Matter has been prepared by Directors of the Bank in compliance with the Suitable Criteria.

Management is also responsible for the internal controls as management determines is necessary to enable the preparation of the 2025 Climate Report, that is free from material misstatement, whether due to fraud or error.

Independence and quality control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Our firm applies International Standard on Quality Management 1 (ISQM Italia 1) and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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Independent Auditors' responsibility

Our responsibility is to express a conclusion on the Subject Matter based on our limited assurance engagement. We conducted our limited assurance engagement in accordance with the provisions of the standard "International Standard on Assurance Engagements 3000 – Assurance Engagements other than Audits or Reviews of Historical Financial Information" ("ISAE 3000 revised") issued by the International Auditing and Assurance Standards Board. This standard requires that we plan and perform our procedures to obtain limited assurance whether the Subject Matter is free from material misstatement.

The procedures we performed were based on our professional judgment and included inquiries, primarily of persons responsible for the preparation of the Subject Matter, inspection of documents, recalculation, agreeing or reconciling with underlying records and other evidence-gathering procedures that are appropriate in the circumstances.

Our limited assurance engagement also included:

- understanding of the internal rules underlying the preparation of the Subject Matter through acquisition and analysis of the relevant internal documentation (policies, procedures, process guides and methodologies);
- interviews and discussions with Bank's management to gather information on the reporting and technology systems used in preparing the Subject Matter and on the processes and internal control procedures used to gather, combine, process and transfer data and information for the preparation of the Subject Matter;
- sample-based analyses of documentation supporting the preparation of the Subject Matter to obtain evidence of the application of the processes put in place to prepare the data and information presented therein;
- analysis of the consistency of the information reported in the Subject Matter with the relevant disclosures reported in the 2025 Consolidated Sustainability Statement approved by the Board of Directors of the Bank on 26 February 2026;
- obtaining a representation letter from management on the compliance of the Subject Matter with the Suitable Criteria.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement conducted in accordance with ISAE 3000 revised and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in a reasonable assurance engagement.

Conclusion

Based on the procedures we have performed, nothing has come to our attention that causes us to believe that the Subject Matter for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with the Suitable Criteria.

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Others matters

Without modifying our conclusion, we draw attention to the sections "Methodology: Own Emissions" and "Methodology: Target Setting on Lending Activities" of the Subject Matter, which describe the basis for preparation. The Subject Matter is prepared for the purposes described in the first paragraph. As a result, the Subject Matter may not be suitable for another purpose. This report is intended solely for use l described in the first paragraph; therefore, it cannot be used for purposes other than those for which it was requested.

Milan, 2 April 2026

EY S.p.A.
Matteo Caccialanza
(Auditor)

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